Yosemite National Park

National Park Service
U.S. Department of the Interior

Merced Wild and Scenic River

Final Comprehensive Management Plan and Environmental Impact Statement

Volume 3B: Appendices M–T

February 2014

Providing Access and Protecting Resources

Yosemite National Park

National Park Service
U.S. Department of the Interior

Merced Wild and Scenic River
Comprehensive Management Plan and Final Impact Statement

Volume 3B: Appendices M-T

February 2014

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APPENDIX M

CHANGES TO OUTSTANDINGLY REMARKABLE VALUES (ORV) OVER TIME (1986 – PRESENT)

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APPENDIX M

CHANGES TO MERCED RIVER OUTSTANDINGLY REMARKABLE VALUES (ORV) OVER TIME (1986-PRESENT)

SEGMENT 1: MERCED RIVER ABOVE NEVADA FALL

Geological/Hydrological Processes ORV

1986 Sierra National Forest Draft Land and Resource Management Plan	Most spectacular glaciated valley in world, granite cliffs and domes.
1996 Draft Yosemite Valley Housing Plan	Glaciation, cirques, "Lost" and "Twin Bridges" hanging valley separated by cascades; world's largest concentrations of granite domes. River gradient from 13,000 to 6,000 feet, glaciers, pristine water quality, log jams.
2000 and 2005 Merced River Plans	U-shaped, glacially carved canyon, cascades and soda springs below Washburn Lake. Free flowing, gradient drop, glacial remnants, logjam, numerous cascades
2008 Draft ORVs	Glacial processes. River gradient drop, rapid snowmelt producing high-volume spring flows.
2010 Draft ORVs	Large-scale, U-shaped glacially carved canyon, above Brunell Point shows relationship between geology and river course.
2011 Spring Draft Baseline Conditions Report	Following the path of the ancient Merced River, glaciers gouged a textbook U-shaped canyon with sheer granite walls rising steeply above.
2011 Fall Planning Workbook	The upper Merced River canyon is a textbook example of a canyon that was carved by glaciers.
2012 Preliminary Concepts Workbook and Draft Baseline Condition Report	The upper Merced River canyon is a textbook example of a glacially-carved canyon.
2013 Draft Comprehensive Management Plan and EIS	No change.
2014 Final Comprehensive Management Plan and EIS	No change.

Reason for Change: The cascades, soda springs, and logjam were removed as they are not rare, unique, or exemplary. Free-flowing conditions are an established river value. Geology experts have noted that the canyon is not U-shaped, yet it remains a textbook example of a glacially-carved granite canyon. The geological and hydrological river values were merged in the 2010 *Draft ORV* report because these values overlap and are best described and managed as a single value.

Biological ORV

1986 Sierra National Forest Draft Land And Resource Management Plan	Vegetation: state listed rare species.
1996 Draft Yosemite Valley Housing Plan	Large specimens of western juniper above Washburn Lake, white fir above LYV, rare plant: Eriophyllum congdonii, rare wildlife: Mt. Lyell salamander, mountain yellow-legged frog, Yosemite toad.
2000 and 2005 Merced River Plans	Sierra riverine environments, high-quality riparian, meadow, aquatic habitats, special status-species such as mountain yellow-legged frog.
2008 Draft ORVs*	Riparian and wetland habitats, rare and special-status plant and animal species:

	willow flycatcher, Sierra Nevada yellow-legged frog, harlequin duck, black swift, and Tompkin's sedge.
2010 Draft ORVs	Meadows, riparian habitats, annual flooding, 8 of 9 special status animal species.
2011 Spring Draft Baseline Condition Report	Numerous, exquisite small meadows and relatively intact adjacent riparian habitats support several rare bird and mammal species.
2011 Fall Planning Workbook	The Merced River creates numerous, small meadows and relatively intact adjacent riparian habitats.
2012 Preliminary Concepts Workbook and Draft Baseline Condition Report	No change.
2013 Draft Comprehensive Management Plan and EIS	The Merced River contains numerous small meadows and riparian habitat with high biological integrity.
2014 Final Comprehensive Management Plan and EIS	The Merced River sustains numerous small meadows and riparian habitat with high biological integrity.

Reason for Change: Special-status species were removed because they are not strictly river related or river dependent. The ORV was revised to include the meadow and riparian habitat in its entirety that, in addition, to existing U.S. Fish and Wildlife Service and California Department of Fish and Game protocol, would serve to protect special status species and other riparian and meadow species found along the Merced River corridor.

Recreational ORV

1986 Sierra National Forest Draft Land and Resource Management Plan	No Recreational ORV.
1996 Draft Yosemite Valley Housing Plan	Travel and camping in LYV, Merced Lake, Washburn Lake.
2000 and 2005 Merced River Plans	Solitude, primitive & unconfined, day hiking, backpacking, horseback riding and packing, camping, enjoyment of natural river sounds, untrailed sections.
2008 Draft ORVs	Hiking, backpacking, writing, contemplation, nature study, photography, artistic expression, fishing, camping, and picnicking--create memories, traditions, and bonding.
2010 Draft ORVs	Hiking and backpacking, wilderness experiences, solitude, personal reflection, closeness to nature, independence, self-reliance, primitive travel, camping, exploration, and adventure.
Spring 2011 Draft Baseline Conditions Report	The Merced River, spectacular High Sierra landscape, dramatic scenery, natural sounds, and abundant opportunities for solitude combine to produce a variety of exceptional wilderness-oriented recreational activities.
2011 Fall Planning Workbook	Visitors to federally-designated Wilderness in the corridor engage in a variety of activities in an iconic High Sierra landscape, where opportunities for primitive and unconfined recreation, self-reliance, and solitude shape the experience.
2012 Preliminary Concepts Workbook and Draft Baseline Condition Report	No change.
2013 Draft Comprehensive Management Plan and EIS	No change.
2014 Final Comprehensive Management Plan and EIS	Visitors to federally designated Wilderness in the corridor engage in a variety of river-related activities in an iconic High Sierra landscape, where opportunities for primitive and unconfined recreation, self-reliance, and solitude shape the experience.

Reason for Change: All specific activities were removed from the title of the ORV and an emphasis was placed on the river-related elements of wilderness character that are exemplary in this river segment.

Scenic ORV

1986 Sierra National Forest Draft Forest Land and Resource Management Plan	One of the most spectacular scenic canyons in the world, waterfalls.
1996 Draft Yosemite Valley Housing Plan	Glaciated Merced Lake, Washburn Lake river Canyon; Bunnell Cascades and confluences of tributaries, Clark and Cathedral ranges.
2000 and 2005 Merced River Plans	Views of glaciated river canyon, Merced Lake, Washburn Lake Bunnell Cascades, confluence of tributaries, granite domes, Clark and Cathedral ranges.
2008 Draft ORVs	Seasonal and daily changes, lighting on granite walls, domes, meadows, calm water, rushing cascades, scenic experience encourages interpretation and education.
2010 Draft ORVs	Patternoster Lakes, Montane forest, U-shaped glacial valley, several scenic landmarks listed, natural setting, exceptional scenery.
Spring 2011 Draft Baseline Conditions Report	No change.
2011 Fall Planning Workbook	Visitors to this Wilderness segment experience scenic views of serene montane lakes, pristine meadows, slickrock cascades, and High Sierra peaks.
2012 Preliminary Concepts Workbook and Draft Baseline Condition Report	No change.
2013 Draft Comprehensive Management Plan and EIS	Visitors to this Wilderness segment experience exemplary views of serene montane lakes, pristine meadows, slickrock cascades, and High Sierra peaks.
2014 Final Comprehensive Management Plan and EIS	No change.

Reason for Change: Views of Bunnell Cascades and paternoster lakes were removed as they are not rare, unique or exemplary. Views of the Clark and Cathedral Ranges were removed as they are not always visible from the river corridor. A more appropriate and accurate list of exemplary High Sierra scenic views was subsequently developed.

Cultural ORV

1986 Sierra National Forest Draft Forest Land and Resource Management Plan	No Cultural ORV
1996 Draft Yosemite Valley Housing Plan	Prehistoric, trans-Sierran route used for 3-4 thousand years, 24 archeological sites, 28 historic structures at Merced Lake.
2000 and 2005 Merced River Plans	Prehistoric, trans-Sierran route used for thousands of years, prehistoric sites, homestead sites, trails, river crossings, HSC, and structures.
2005 MRP	No change.
2008 Draft ORVs	Trails along Merced for trade and cultural exchange for thousands of years, archeological sites, American Indian spiritual associations.
2010 Draft ORVs	No Cultural ORV.
2011 Fall Planning Workbook	No Cultural ORV.
2012 Preliminary Concepts Workbook and Draft Baseline Condition Report	No Cultural ORV.
2013 Draft Comprehensive Management Plan and EIS	No Cultural ORV.
2014 Final Comprehensive Management Plan and EIS	No Cultural ORV.

Reason for Change: The prehistoric, trans-Sierran route used for thousands of years, prehistoric sites, homestead sites, trails, river crossings, and the Merced Lake High Sierra Camp and structures were excluded from the list of ORVs as they are not rare, unique, or exemplary in a regional or national context.

SEGMENTS 2A: EAST YOSEMITE VALLEY (TOP OF NEVADA FALL TO SENTINEL BEACH) AND 2B: WEST YOSEMITE VALLEY (SENTINEL BEACH TO JUNCTION OF EL PORTAL ROAD AND BIG OAK FLAT ROAD)

Geological/Hydrological Processes ORV

1986 Sierra National Forest Draft Forest Land and Resource Management Plan	Most spectacular glaciated valley in world, granite cliffs & domes.
1996 Draft Yosemite Valley Housing Plan	Largest glaciated valley in Sierra, hanging valleys, terminal moraine, exfoliation, exposed granite monoliths. World-class waterfalls, flood regime, oxbows, Mirror Lake.
2000 and 2005 Merced River Plans	Glaciated U-shaped valley, mature meandering river, hanging valleys listed glaciation (moraines). Meandering river, world-renowned waterfalls, flood regime, oxbows, wetlands, fluvial processes.
2008 Draft ORVs	Glacial processes formed U-shaped valley, Giant Staircase, El Cap moraine, active rock falls. Meandering river, hanging valleys, world-renowned waterfalls.
2010 Draft ORVs	Giant Staircase, El Cap Moraine, Glacial action creating hanging valleys and world-renowned waterfalls, meandering and alluvial river (gentle gradient, flood regime, woody debris, and riparian vegetation).
Spring 2011 Draft Baseline Conditions Report	The "Giant Staircase," which includes Vernal and Nevada Falls, is one of the finest examples of stair-step river morphology in the country. Yosemite Valley has exemplary glacial geology on display, from spectacular hanging valleys to textbook recessional moraines. From Happy Isles to the west end of the valley, the Merced River is a rare example of a mid-elevational alluvial river.
2011 Fall Planning Workbook	The "Giant Staircase," which includes Vernal and Nevada Falls, is one of the finest examples in the western United States of stair-step river morphology. The El Capitan Moraine is an extraordinary example of a recessional moraine. The Merced River from Happy Isles to the west end of Yosemite Valley provides an outstanding example of a rare, mid-elevation alluvial river.
2012 Preliminary Concepts Workbook and Draft Baseline Condition Report	No change.
2013 Draft Comprehensive Management Plan and EIS	The "Giant Staircase," which includes Vernal and Nevada Falls, is one of the finest examples in the western United States of stair-step river morphology. The Merced River from Happy Isles to the west end of Yosemite Valley provides an outstanding example of a rare, mid-elevation alluvial river.
2014 Final Comprehensive Management Plan and EIS	No change.

Reason for Change: Oxbows, wetlands, and fluvial processes are included in the biological ORV or are included within the expression "meandering and alluvial river." Woody debris and riparian vegetation were added because they are examples of alluvial river functions. In the fall 2011 workbook, The El Capitan Moraine and Giant Staircase were identified as independent ORVs because the management of these values is different than the management of the alluvial river. In the November 2012 draft environmental impact statement, the El Capitan Moraine ORV was removed because moraines are widespread across the Sierra Nevada and it is not unique or exemplary, nor is it strictly river related.

Biological ORV

1986 Sierra National Forest Draft Forest Land and Resource Management Plan	Vegetation: state-listed rare species. Wildlife: peregrine falcon.
1996 Draft Yosemite Valley Housing Plan	Half of all plant species in the park found in Valley, riparian and meadow areas, California black oak, wildlife habitat, listing several rare species, including indigenous rainbow trout.
2000 and 2005 Merced River Plans	Riparian and meadow areas, riparian wetland, riverine areas, habitat for river-related species, special-status species, neo-tropical songbirds, bat species.
2008 Draft ORVs	Riparian and wetland habitats, rare and special-status plant and animal species: willow flycatcher, Sierra Nevada yellow-legged frog, harlequin duck, black swift, and Tompkin's sedge, Happy Isles fen.
2010 Draft ORVs	Meadows, riparian vegetation, high water table, eight rare wildlife species, bat species, sedge species- all due to year-round water availability.
Spring 2011 Draft Baseline Conditions Report	The large, moist meadows and associated riparian communities comprise one of the largest mid-elevation meadow complexes in the Sierra Nevada, supporting an exceptional diversity of plant and animal species.
2011 Fall Planning Workbook	The meadows and riparian communities of Yosemite Valley comprise one of the largest mid-elevation meadow complexes in the Sierra Nevada.
2012 Preliminary Concepts Workbook and Draft Baseline Conditions Report	No change.
2013 Draft Comprehensive Management Plan and EIS	No change.
2014 Final Comprehensive Management Plan and EIS	The meadows and riparian communities of Yosemite Valley comprise one of the largest mid-elevation meadow-riparian complexes in the Sierra Nevada.

Reason for Change: The Happy Isles fen and neotropical songbirds were removed because they are not river related or dependent. Special status species were also removed because they are not strictly river related or dependent. The ORV was subsequently revised to include the meadow and riparian habitat in its entirety, which, in addition to existing U.S. Fish and Wildlife Service and California Department of Fish and Game protocol, will serve to protect special status species in addition to other riparian and meadow species found along the Merced River corridor.

Recreational ORV

1986 Sierra National Forest Draft Forest Land and Resource Management Plan	Premier outdoor recreation area in world, picnicking, fishing, swimming, river rafting.
1996 Draft Yosemite Valley Housing Plan	Hiking, picnicking, camping, climbing, skiing, fishing, photography, swimming, nature study, horseback riding, biking, sightseeing, and boating.
2000 and 2005 Merced River Plans	River-related rec activities, nature study & sightseeing to hiking, one of the premier outdoor rec areas in the world.
2008 Draft ORVs	Hiking, backpacking, writing, contemplation, nature study, photography, artistic expression, fishing, camping, and picnicking--create memories, traditions, and bonding, Mist Trail, swimming and floating.
2010 Draft ORVs	World-renowned destination, World Heritage Site, outdoor river-related recreation, active pursuits listed, creative pursuits listed, opportunities for all ages and abilities.
Spring 2011 Draft Baseline Conditions Report	The Valley's incredible setting – with its striking cliffs and waterfalls towering above a meandering river and extensive moist meadows – provides for a variety of active, creative, educational, social, and reflective experiences.
2011 Fall Planning Workbook	Visitors to Yosemite Valley enjoy a wide variety of river-related recreational activities in the Valley's extraordinary setting along the Merced River.

2012 Preliminary Concepts Workbook and Draft Baseline Conditions Report	No change.
2013 Draft Comprehensive Management Plan and EIS	No change.
2014 Final Comprehensive Management Plan and EIS	No change.

Reason for Change: All specific activities were removed from the title of the ORV and an emphasis was placed on the river-related elements of wilderness character that are exemplary in this river segment.

Scenic ORV

1986 Sierra National Forest Draft Forest Land and Resource Management Plan	One of most spectacularly scenic canyons in the world, waterfalls.
1996 Draft Yosemite Valley Housing Plan	Specific examples of Waterfalls, rock cliffs, & meadows, black oak woodlands, interface of river, rock, meadow, and forest, 18 identified historic vistas.
2000 and 2005 Merced River Plans	Specific examples of waterfalls, rock cliffs, & meadows; interface of river, rock, meadow, and forest.
2008 Draft ORVs	Specific valley views listed, depictions of the valley in early tourism posters encourage the creation of the NPS, scenic experience encourages interpretation and education.
2010 Draft ORVs	Famous landmarks listed, compound oxbows, wetlands, and meadows, Montane forest and sheer rock faces create intense contrast and scenic river-related views.
Spring 2011 Draft Baseline Conditions Report	Crashing over Nevada and Vernal Falls and then meandering quietly under 2,000-foot cliffs, the Merced forms a placid foreground to some of the world's most iconic scenery.
2011 Fall Planning Workbook	Visitors to Yosemite Valley experience scenic views of some of the world's most iconic scenery, with the river and meadows forming a placid foreground to towering cliffs and waterfalls.
2012 Preliminary Concepts Workbook and Draft Baseline Conditions Report	No change.
2013 Draft Comprehensive Management Plan and EIS	Visitors to Yosemite Valley experience views of some of the world's most iconic scenery, with the river and meadows forming a placid foreground to towering cliffs and waterfalls.
2014 Final Comprehensive Management Plan and EIS	Visitors to Yosemite Valley experience scenic views of some of the world's most iconic scenery, with the river and meadows forming a placid foreground to towering cliffs and waterfalls.

Reason for Change: This ORV has remained generally consistent over time.

Cultural ORVs

1986 Sierra National Forest Draft Forest Land and Resource Management Plan	Indian sites along river, Miwok area.
1996 Draft Yosemite Valley Housing Plan	100 archeological sites, prehistoric people habitation, traditionally used plants, spiritual areas, prehistoric trail junctions, first land area and river designated for preservation in US, historical resources and landscapes.
2000 and 2005 Merced River Plans	Thousands of years of human occupation, archeological sites, continuing traditional use, designed landscapes & developed areas, historic buildings, circulation systems providing access to natural features that are culturally valuable.
2008 Draft ORVs	Trails along Merced for trade and cultural exchange for thousands of years, cultural landscapes reflecting human footprint, archeological sites, American Indian spiritual associations.

2010 Draft ORVs	Traditional Cultural Property representing people in area before 1851 to present, traditionally used plants, village sites, and spiritual areas, archeological sites, river-dependent culture.
Spring 2011 Draft Baseline Conditions Report	The Yosemite Valley Archeological District is a nearly continuous, river-related archeological landscape containing dense concentrations of resources that reflect thousands of years of settlement. The Yosemite Valley potential Traditional Cultural Property (TCP) represents a rare connection of places and people that began before 1851 and continues to the present, with the river at the heart of this cultural system.
2011 Fall Planning Workbook	The Yosemite Valley Archeological District is a nearly continuous, river-related archeological landscape containing dense concentrations of resources that reflect thousands of years of settlement. The Yosemite Valley potential Traditional Cultural Property (TCP) represents a rare connection of places and people that began before 1851 and continues to the present, with the river at the heart of this cultural system.
2012 Preliminary Concepts Workbook and Draft Baseline Condition Report	The Yosemite Valley Archeological District is a linked landscape that contains dense concentrations of resources that represent thousands of years of human settlement along this segment of the Merced River. Yosemite Valley American Indian ethnographic resources include a linked landscape of specifically mapped, traditional-use plant populations and other ongoing cultural practices.
2013 Draft Comprehensive Management Plan and EIS	The Yosemite Valley Archeological District is an unusually rich and linked landscape that contains dense concentrations of resources that represent thousands of years of human settlement along this segment of the Merced River. Yosemite Valley American Indian ethnographic resources include a linked landscape of specifically mapped, traditional-use plant populations, as well as the ongoing traditional cultural practices that reflect the intricate continuing relationship between indigenous peoples of the Yosemite region and the Merced River in Yosemite Valley. Yosemite Valley Historic Resources: Represent a linked landscape of river-related or river dependent, rare, unique or exemplary buildings and structures that bear witness to the historical significance of the river system. This includes 13
2013 Final Comprehensive Management Plan and EIS	Yosemite Valley Archeological District: no change. Yosemite Valley American Indian Ethnographic Resources: no change. Yosemite Valley Historic Resources: The entire Yosemite Valley Historic District and its associated landscape characteristics, the three historic developed areas, and the three National Historic Landmarks are inherently river-related. These components that extend beyond the ¼-mile Merced wild and scenic river corridor comprise the Yosemite Valley Historic Resources ORV -- a landscape of rare, unique, or exemplary, and river-related historic properties.
2014 Final Comprehensive Management Plan and EIS	Yosemite Valley Archeological District: no change. Yosemite Valley American Indian Ethnographic Resources: no change. Yosemite Valley Historic Resources: The Yosemite Valley Historic District represents a linked landscape of river-related or river-dependent, rare, unique or exemplary contributing resources that bear witness to the historical significance of the river system.

Reason for Change: Prehistoric trail junctions and circulation systems were removed as they are not rare, unique, or exemplary. Historic buildings were removed between 2008 and 2010 because the NPS contended at the time that they are not river related or dependent. Circulation systems were removed because they are not rare, unique, or exemplary; most river-canyon circulation systems are structured similarly.

The Yosemite Valley Archeological District was identified as a separate ORV from the ethnographic resources because the management strategies for these values can be different. The Yosemite Valley Archeological District encompasses a complete interrelated landscape of archeological resources that must be managed as a district.

The term American Indian is the preferred term.

The Yosemite Valley Historic Resources ORV was added in 2013 to recognize the significance of this exemplary river-related historic landscape and to better protect it in its entire context along the Merced

River corridor. It was further updated between the DEIS and FEIS to reflect the entire Yosemite Valley Historic District as an interconnected and inherently river-related resource.

SEGMENT 3: MERCED GORGE (JUNCTION OF EL PORTAL AND BIG OAK FLAT ROADS TO WESTERN YOSEMITE NATIONAL PARK BOUNDARY AT PARKLINE)

Geological/Hydrological Processes ORV

1986 Sierra National Forest Draft Forest Land and Resource Management Plan	No Geological/Hydrological ORV.
1996 Draft Yosemite Valley Housing Plan	Transition from U-shaped, glaciated valley to V-shaped gorge. "Young river."
2000 and 2005 Merced River Plans	Transition from U-shaped valley to V-shaped gorge with steep gradient. Exceptionally steep gradients (2,000 foot elevation drop in 6 miles).
2008 Draft ORVs	Glacial Processes. River gradient drop, rapid snowmelt producing high-volume spring flows, rock-fall driven morphology resulting in the deposition of enormous boulders.
2010 Draft ORVs	No Geological/Hydrological ORV.
Spring 2011 Draft Baseline Conditions Report	No Geological/Hydrological ORV.
2011 Fall Planning Workbook	No Geological/Hydrological ORV.
2012 Preliminary Concepts Workbook and Draft Baseline Conditions Report	No Geological/Hydrological ORV.
2013 Draft Comprehensive Management Plan and EIS	No Geological/Hydrological ORV.
2014 Final Comprehensive Management Plan and EIS	No Geological/Hydrological ORV.

Reason for Change: Transition from U-shaped valley to V-shaped gorge with steep gradient was removed as it is not rare, unique, or exemplary; most Sierra rivers have such a transition.

Biological ORV

1986 Sierra National Forest Draft Forest Land and Resource Management Plan	Vegetation: state-listed rare species. Wildlife: peregrine falcon.
1996 Draft Yosemite Valley Housing Plan	Diverse riparian areas intact and almost entirely undisturbed, canyon live oak research, indigenous rainbow trout.
2000 and 2005 Merced River Plans	Rich and diverse riparian habitat associated with intact special status species that are relatively undisturbed.
2008 Draft ORVs	Riparian and wetland habitats, rare and special-status plant and animal species: willow flycatcher, Sierra Nevada yellow-legged frog, harlequin duck, black swift, & Tompkin's sedge.
2010 Draft ORVs	No Biological ORV.
Spring 2011 Draft Baseline Conditions Report	No Biological ORV.
2011 Fall Planning Workbook	No Biological ORV.
2012 Preliminary Concepts Workbook and Draft Baseline Conditions Report	No Biological ORV.

2013 Draft Comprehensive Management Plan and EIS	No Biological ORV.
2014 Final Comprehensive Management Plan and EIS	No Biological ORV.

Reason for Change: Rich and diverse riparian habitat associated with intact special status species that are relatively undisturbed was removed as it is not rare, unique, or exemplary.

Recreational ORV

1986 Sierra National Forest Draft Forest Land and Resource Management Plan	No Recreational ORV.
1996 Draft Yosemite Valley Housing Plan	Picnicking, climbing, fishing, photography, and sightseeing.
2000 and 2005 Merced River Plans	River-related recreational opportunities: Picnicking, fishing, photography, and sightseeing.
2008 Draft ORVs	Views of granite cliffs, roar and vibrations of river during spring runoff, picnicking--create memories, traditions, and bonding.
2010 Draft ORVs	Scenic driving and access to several pools and beaches for swimming, fishing, and picnicking; natural setting and opportunities for solitude.
Spring 2011 Draft Baseline Conditions Report	The rushing and cascading river, interspersed with scheduled holes, provides the setting for relaxing river-related activities.
2011 Fall Planning Workbook	No Recreational ORV.
2012 Preliminary Concepts Workbook and Draft Baseline Condition Report	No Recreational ORV.
2013 Draft Comprehensive Management Plan and EIS	No Recreational ORV.
2014 Final Comprehensive Management Plan and EIS	No Recreational ORV.

Reason for Change: The recreational ORV was removed from this segment because none of the river-related or dependent activities are rare, unique, or exemplary.

Scenic ORV

1986 Sierra National Forest Draft Forest Land and Resource Management Plan	One of most spectacularly scenic canyons in the world, waterfalls.
1996 Draft Yosemite Valley Housing Plan	View of Pulpit Rock and Rainbow, views of specific waterfalls and rocks listed, V-shaped gorge; the river and its cascades.
2000 and 2005 Merced River Plans	Views of the Cascades, spectacular rapids among giant boulders, views of specific waterfalls and rocks listed.
2008 Draft ORVs	Seasonal and daily changes, lighting on granite walls, calm water, rushing cascades, scenic experience encourages interpretation and education.
2010 Draft ORVs	Narrow gorge, massive boulders, canyon walls and cliffs, waterfalls, parades of color.
Spring 2011 Draft Baseline Conditions Report	Descending 2,000 feet in 14 miles, the river is a continuous cascade under spectacular Sierra granite outcrops and domes.
2011 Fall Planning Workbook	The Merced River drops 2,000 feet over 14 miles; a continuous cascade under spectacular Sierra granite outcrops and domes.
2012 Preliminary Concepts Workbook and Draft Baseline Condition Report	No change.

2013 Draft Comprehensive Management Plan and EIS	The Merced River drops 2,000 feet over 14 miles, a continuous cascade under exemplary Sierra granite outcrops and domes.
2014 Final Comprehensive Management Plan and EIS	The Merced River drops 2,000 feet over 14 miles, a continuous cascade under spectacular Sierra granite outcrops and domes.

Reason for Change: Present language is consistent with statements made in the past.

Cultural ORV

1986 Sierra National Forest Draft Forest Land and Resource Management Plan	Indian sites along river, Miwok area.
1996 Draft Yosemite Valley Housing Plan	Archeological sites in the Cascades area.
2000 and 2005 Merced River Plan	Prehistoric sites and historic sites & structures such as those relating to historic engineering projects.
2008 Draft ORVs	Trails along Merced for trade and cultural exchange for thousands of years, archeological sites, American Indian spiritual associations.
2010 Draft ORVs	No Cultural ORV.
Spring 2011 Draft Baseline Conditions Report	No Cultural ORV.
2011 Fall Planning Workbook	No Cultural ORV.
2012 Preliminary Concepts Workbook and Draft Baseline Conditions Report	No Cultural ORV.
2013 Draft Comprehensive Management Plan and EIS	No Cultural ORV.
2014 Final Comprehensive Management Plan and EIS	No Cultural ORV.

Reason for Change: Prehistoric sites and historic sites & structures such as those relating to historic engineering projects were removed as they are not rare, unique, or exemplary.

SEGMENT 4: EL PORTAL (WESTERN YOSEMITE NATIONAL PARK BOUNDARY AT PARKLINE TO EL PORTAL ADMINISTRATIVE SITE BOUNDARY)

Geological/Hydrological Processes ORV

1986 Sierra National Forest Draft Forest Land and Resource Management Plan	Contact between meta sedimentary & granitic rocks.
1996 Draft Yosemite Valley Housing Plan	Transition from igneous to meta-sedimentary rocks--possibly oldest in Sierra Nevada. Continuous rapids throughout segment.
2000 and 2005 Merced River Plans	Transition from igneous to metasedimentary rocks--among oldest in Sierra Nevada. Continuous rapids.
2008 Draft ORVs	Glacial Processes.
2010 Draft ORVs	No Geological/Hydrological ORV.
Spring 2011 Draft Baseline Conditions Report	Changing river gradients, glacial history, and powerful floods created a boulder bar whose huge boulders are much larger than typically found in such deposits.
2011 Fall Planning Workbook	No Geological/Hydrological ORV.

2012 Preliminary Concepts Workbook and Draft Baseline Conditions Report	The boulder bar in El Portal was created by changing river gradients, glacial history, and powerful floods. These elements have resulted in accumulation of extraordinary, large boulders, which are rare in such deposits.
2013 Draft Comprehensive Management Plan and EIS	No change.
2014 Final Comprehensive Management Plan and EIS	No change.

Reason for Change: The language was revised to more clearly explain the origin of the boulder bar in El Portal.

Transition from igneous to meta-sedimentary rocks – among the oldest in the Sierra Nevada was removed as it is not rare, unique, or exemplary (occurring on most rivers flowing west from the Sierra crest).

Biological ORV

1986 Sierra National Forest Draft Forest Land and Resource Management Plan	Vegetation: state-listed rare species.
1996 Draft Yosemite Valley Housing Plan	Rare plant species listed, valley elderberry longhorn beetle and its habitat, spotted owl habitat, riparian zone for wildlife species.
2000 and 2005 Merced River Plans	Riverine habitats: riparian woodlands associated with special-status species, Tompkin's sedge and Valley elderberry longhorn beetle and its habitat; riparian zone for wildlife species.
2008 Draft ORVs	Riparian and wetland habitats, rare and special-status plant and animal species: willow flycatcher, Sierra Nevada yellow-legged frog, harlequin duck, black swift, & Tompkin's sedge.
2010 Draft ORVs	No Biological ORV.
Spring 2011 Draft Baseline Conditions Report	Valley oaks (*Quercus lobata*), a regionally rare species, thrive in this area due to its high water table.
2011 Fall Planning Workbook	No Biological ORV.
2012 Preliminary Concepts Workbook and Draft Baseline Conditions Report	Valley oaks (*Quercus lobata*), a regionally rare species, occur in the El Portal area.
2013 Draft Comprehensive Management Plan and EIS	No Biological ORV.
2014 Final Comprehensive Management Plan and EIS	No Biological ORV.

Reason for Change: Tompkin's sedge and valley elderberry longhorn beetle were removed because they are not river related or dependent. Riverine habitats: riparian woodlands associated with special-status species were removed as they are not rare, unique, or exemplary.

Valley oaks (*Quercus lobata*) were initially added due to public comment. In the January 2013 draft environmental impact statement, the valley oaks ORV was removed as valley oaks are widespread across California and the Sierra Nevada foothills and, while commonly located along drainages and in low lying wet areas, are not strictly river-related or dependent. The El Portal stand of valley oaks was determined to not be rare or exemplary as larger specimens of valley oaks occur in the greater Yosemite Region, along the Merced River, downstream of the park and along river tributaries.

Recreational ORV

1986 Sierra National Forest Draft Forest Land and Resource Management Plan	Whitewater boating.
1996 Draft Yosemite Valley Housing Plan	Whitewater use (class III to V) and fishing.
2000 and 2005 Merced River Plans	Range of river-related rec opportunities, white-water rafting and kayaking (class III to V) and fishing.
2008 Draft ORVs	Hiking, backpacking, writing, contemplation, nature study, photography, artistic expression, fishing, camping, and picnicking--create memories, traditions, and bonding.
2010 Draft ORVs	No Recreational ORV.
Spring 2011 Draft Baseline Conditions Report	The largely natural setting of the river provides for memorable active, contemplative, and creative pursuits.
2011 Fall Planning Workbook	No Recreational ORV.
2012 Preliminary Concepts Workbook and Draft Baseline Conditions Report	No Recreational ORV.
2013 Draft Comprehensive Management Plan and EIS	No Recreational ORV.
2014 Final Comprehensive Management Plan and EIS	No Recreational ORV.

Reason for Change: The recreational ORV in this segment was removed because the representative activities are not rare, unique, or exemplary.

Scenic ORV

Reason for Change: The Scenic ORV was included in the 2008 *Draft ORVs* but removed as the scenery in this segment was determined not to be unique, rare or exemplary.

Cultural ORV

1986 Sierra National Forest Draft Forest Land and Resource Management Plan	El Portal, old mining town, rail-road exhibit.
1996 Draft Yosemite Valley Housing Plan	Native American habitation; 17 archeological sites, including burials, historic structures; logging railroad incline.
2000 and 2005 Merced River Plans	Some of the oldest archeological sites in Yosemite, historic Indian villages and gathering places, historic structures related to early tourism and industrial development.
2008 Draft ORVs	Trails along Merced for trade and cultural exchange for thousands of years, archeological sites, American Indian spiritual associations.
2010 Draft ORVs	Important place of settlement, subsistence, and trade along the River; village sites; some of the oldest archeological deposits in the Sierra foothills (9,500 years), Johnny Wilson Ranch (American Indian Homestead).
Spring 2011 Draft Baseline Conditions Report	With its temperate climate and abundant subsistence resources, El Portal was a crossroads of life and trade, with the river linking the lifeways of peoples from the historic and prehistoric past, both in California and beyond.
2011 Fall Planning Workbook	The El Portal Archeological District contains dense concentrations of resources that represent thousands of years of occupation and evidence of continuous, far-reaching traffic and trade. This segment includes some of the oldest deposits in the region and the Johnny Wilson Ranch, a regionally rare historic-era American Indian Homestead.
2012 Preliminary Concepts Workbook and Draft Baseline Conditions Report	The El Portal Archeological District contains dense concentrations of resources that represent thousands of years of occupation and evidence of continuous, far-reaching traffic and trade.

2013 Draft Comprehensive Management Plan and EIS	The El Portal Archeological District contains dense concentrations of resources that represent thousands of years of occupation and evidence of continuous, far-reaching traffic and trade. This segment includes some of the oldest deposits in the region, including the archeological remains of the Johnny Wilson Ranch, a regionally rare historic-era American Indian Homestead.
2014 Final Comprehensive Management Plan and EIS	No change.

Reason for Change: Historic structures related to early tourism and industrial development were removed as they are not rare, unique, or exemplary, occurring in many resort areas along rivers in the country. The Johnny Wilson Ranch was added because it is rare, unique, and exemplary. The El Portal Archeological District was identified as a Cultural ORV because it encompasses a complete interrelated landscape of archeological resources that must be managed as a district.

SEGMENT 5: SOUTH FORK MERCED RIVER ABOVE WAWONA: HEADWATERS TO TOP OF POOL AT WAWONA IMPOUNDMENT

Geological/Hydrological Processes ORV

1986 Sierra National Forest Draft Forest Land and Resource Management Plan	The South Fork was not included in the 1986 ORVs.
1996 Draft Yosemite Valley Housing Plan	V-Shaped canyons due to extremely hard rock, moraine meadows, hot sulphur springs above Gravely Ford, Paternoster lakes. Free-flowing river and pristine water quality.
2000 and 2005 Merced River Plans	Glaciated valleys in high country and V-shaped canyons above Wawona; moraine meadows and soda springs above Gravelly Ford are river-related geologic features. Free-flowing river and excellent water quality.
2008 Draft ORVs	Glacial Processes. River gradient drop, rapid snowmelt producing high-volume spring flows.
2010 Draft ORVs	No Geological/Hydrological ORV.
Spring 2011 Draft Baseline Conditions Report	No Geological/Hydrological ORV.
2011 Fall Planning Workbook	No Geological/Hydrological ORV.
2012 Preliminary Concepts Workbook and Draft Baseline Conditions Report	No Geological/Hydrological ORV.
2013 Draft Comprehensive Management Plan and EIS	No Geological/Hydrological ORV.
2014 Final Comprehensive Management Plan and EIS	No Geological/Hydrological ORV.

Reason for Change: The glaciated valleys in the high country, and V-shaped canyons above Wawona, and moraine meadows and soda springs above Gravelly Ford were removed as they are not rare, unique, or exemplary. Free-flowing conditions and water quality are established river values.

Biological ORV

1986 Sierra National Forest Draft Forest Land and Resource Management Plan	No Biological ORV.
1996 Draft Yosemite Valley Housing Plan	Rare wildlife species, including Wawona riffle beetle & mountain yellow-legged frog.
2000 and 2005 Merced River Plans	Riverine environments typical of Sierra; examples of special-status species, including Wawona riffle beetle & mountain yellow-legged frog.
2008 Draft ORVs	Riparian and wetland habitats, rare and special-status plant and animal species: willow flycatcher, Sierra Nevada yellow-legged frog, harlequin duck, black swift, & Tompkin's sedge.
2010 Draft ORVs	Meadows, riparian habitats, depend on annual flooding, 8 of the 9 special status animal species.
Spring 2011 Draft Baseline Conditions Report	No Biological ORV.
2011 Fall Planning Workbook	No Biological ORV.
2012 Preliminary Concepts Workbook and Draft Baseline Conditions Report	The Merced River creates numerous, exquisite small meadows and relatively intact adjacent riparian habitats.
2013 Draft Comprehensive Management Plan and EIS	The Merced River sustains numerous small meadows and riparian habitat with high biological integrity.
2014 Final Comprehensive Management Plan and EIS	No change.

Reason for Change: Wawona riffle beetle and mountain yellow-legged frog were removed because they are not river related or dependent.

Recreational ORV

1986 Sierra National Forest Draft Forest Land and Resource Management Plan	No Recreational ORV.
1996 Draft Yosemite Valley Housing Plan	Pristine wilderness values; no trails along river.
2000 and 2005 Merced River Plan	River-related solitude, enjoyment of natural river sounds, primitive & unconfined recreation; predominantly without trails, except 4 bridgeless trail crossings in the upper segment.
2008 Draft ORVs	Hiking, backpacking, writing, contemplation, nature study, photography, artistic expression, fishing, camping, and picnicking--create memories, traditions, and bonding.
2010 Draft ORVs	Dramatic scenery, natural sounds, hiking & backpacking, wilderness experiences, solitude, personal reflection, closeness to nature, independence, self-reliance, primitive travel, camping, exploration, & adventure.
Spring 2011 Draft Baseline Conditions Report	The Merced River, spectacular High Sierra landscape, dramatic scenery, natural sounds, and abundant opportunities for solitude combine to produce a variety of exceptional wilderness-oriented recreational activities.
2011 Fall Planning Workbook	No Recreational ORV.
2012 Preliminary Concepts Workbook and Draft Baseline Conditions Report	No Recreational ORV.
2013 Draft Comprehensive Management Plan and EIS	No Recreational ORV.
2014 Final Comprehensive Management Plan and EIS	No Recreational ORV.

Reason for Change: The recreational ORV in this segment was removed because the representative activities are not rare, unique, or exemplary.

Scenic ORV

1986 Sierra National Forest Draft Forest Land and Resource Management Plan	No Scenic ORV.
1996 Draft Yosemite Valley Housing Plan	Views of Triple Divide Peak and Sierra Crest.
2000 & 2005 Merced River Plan	Views of unique river features: large pothole pools in slick rock cascades, old growth forest, and meadows.
2008 Draft ORVs	Seasonal and daily changes, lighting on granite walls, domes, meadows, calm water, rushing cascades, scenic experience encourages interpretation and education.
2010 Draft ORVs	Largely inaccessible; few trail crossings; unspoiled Sierra Nevada river valley views dominated by forest-cloaked hills, distant peaks, and an untamed river; some of the wildest views possible in the Sierra Nevada.
Spring 2011 Draft Baseline Conditions Report	Passing through an untrammeled forested wilderness, the South Fork Merced River forms the centerpiece of some of the Sierra's wildest scenery.
2011 Fall Planning Workbook	The South Fork Merced River passes through a vast area of natural scenic beauty.
2012 Preliminary Concepts Workbook and Draft Baseline Conditions Report	No change.
2013 Draft Comprehensive Management Plan and EIS	The South Fork Merced River passes through a vast area of exemplary and wild scenic beauty.
2014 Final Comprehensive Management Plan and EIS	The South Fork Merced River passes through a vast area of natural scenic beauty.

Reason for Change: This ORV has remained generally consistent over time.

Cultural ORV

1986 Sierra National Forest Draft Forest Land and Resource Management Plan	No Cultural ORV.
1996 Draft Yosemite Valley Housing Plan	Archeological sites and historical properties; large expanse of wilderness.
2000 and 2005 Merced River Plan	River-related prehistoric sites and resources; historic stock use and cavalry activities.
2008 Draft ORVs	Trails along Merced for trade and cultural exchange for thousands of years, archeological sites, American Indian spiritual associations.
2010 Draft ORVs	Finding seasonal trade, travel, and subsistence opportunities along the South Fork Merced, Native Americans left behind regionally rare rock ring features with wooden remains.
Spring 2011 Draft Baseline Conditions Report	Finding seasonal trade, travel, and subsistence opportunities along the South Fork Merced, American Indians left behind regionally rare, prehistoric rock-ring features with wooden remains.
2011 Fall Planning Workbook	The Wawona Archeological District encompasses numerous clusters of resources spanning thousands of years of occupation, including evidence of continuous, far-reaching traffic and trade. The South Fork of the Merced River includes regionally rare evidence of indigenous settlement including prehistoric rock ring features with wooden remains.
2012 Preliminary Concepts Workbook and Draft Baseline Conditions Report	The Wawona Archeological District encompasses numerous clusters of resources spanning thousands of years of occupation, including evidence of continuous, far-reaching traffic and trade. This segment includes regionally rare evidence of indigenous settlement along the South Fork Merced River, including prehistoric rock ring features with wooden remains.
2013 Draft Comprehensive Management Plan and EIS	The Wawona Archeological District encompasses numerous clusters of resources spanning thousands of years of occupation, including evidence of continuous, far-reaching traffic and trade. This segment includes regionally rare archeological features representing indigenous settlement and use along the South Fork Merced River at archeological sites with rock ring features.

2014 Final Comprehensive Management Plan and EIS	No change.

Reason for Change: Historic stock use and cavalry activities were removed because they are not river related or dependent, nor are they rare, unique, or exemplary. The term American Indian is the preferred term. It was specified that the rare rock ring features are prehistoric.

The Wawona Archeological District was added because it encompasses a complete interrelated landscape of archeological resources that must be managed as a district. This district spans Segments 5-8.

SEGMENT 6: WAWONA IMPOUNDMENT: TOP OF POOL AT WAWONA IMPOUNDMENT TO 200 FEET BELOW DAM

Geological/Hydrological Processes ORV

1986 Sierra National Forest Draft Forest Land and Resource Management Plan	The South Fork was not included in the 1986 ORVs.
1996 Draft Yosemite Valley Housing Plan	Excellent water quality.
2000 and 2005 Merced River Plans	No change.
2008 Draft ORVs	No Geological/Hydrological ORV.
2010 Draft ORVs	No Geological/Hydrological ORV.
Spring 2011 Draft Baseline Conditions Report	No Geological/Hydrological ORV.
2011 Fall Planning Workbook	No Geological/Hydrological ORV.
2012 Preliminary Concepts Workbook and Draft Baseline Conditions Report	No Geological/Hydrological ORV.
2013 Draft Comprehensive Management Plan and EIS	No Geological/Hydrological ORV.
2014 Final Comprehensive Management Plan and EIS	No Geological/Hydrological ORV.

Reason for Change: Water quality was removed as it is an established river value.

Recreational ORV

Reason for Change: Sightseeing, fishing, photography, and hiking were included as an ORV in 1996 *Draft Yosemite Valley Housing Plan* but removed from subsequent drafts as these recreational activities are not strictly river related or dependent.

Scenic ORV

Reason for Change: Views of the river and Wawona Dome were included as an ORV in the 1996 Draft Yosemite Valley Plan but removed because they were determined not to be rare, unique or exemplary.

Cultural ORV

1986 Sierra National Forest Draft Forest Land and Resource Management Plan	No Cultural ORV.
1996 Draft Yosemite Valley Housing Plan	Archeological sites and historic properties.
2000 & 2005 Merced River Plan	No Cultural ORV.
2008 Draft ORVs	No Cultural ORV.
2010 Draft ORVs	No Cultural ORV.
Spring 2011 Draft Baseline Conditions Report	No Cultural ORV.
2011 Fall Planning Workbook	The Wawona Archeological District encompasses numerous clusters of resources spanning thousands of years of occupation, including evidence of continuous, far-reaching traffic and trade.
2012 Preliminary Concepts Workbook and Draft Baseline Conditions Report	No change.
2013 Draft Comprehensive Management Plan and EIS	No change.
2014 Final Comprehensive Management Plan and EIS	No change.

Reason for Change: The Wawona Archeological District was added as an independent ORV because it encompasses a complete interrelated landscape of archeological resources that must be managed as a district. This district spans Segments 5-8.

SEGMENT 7: WAWONA (200 FEET BELOW WAWONA IMPOUNDMENT TO SQUIRREL CREEK)

Geological/Hydrological Processes ORV

1986 Sierra National Forest Draft Forest Land and Resource Management Plan	The South Fork was not included in the 1986 ORVs.
1996 Draft Yosemite Valley Housing Plan	Moraines; geomorphology of Wawona Meadow; Wawona Dome. Excellent water quality.
2000 and 2005 Merced River Plan	Excellent water quality.
2008 Draft ORVs	Glacial Processes. Low gradient slows river, rapid snowmelt producing high-volume spring flows.
2010 Draft ORVs	No Geological/Hydrological ORV.
Spring 2011 Draft Baseline Conditions Report	No Geological/Hydrological ORV.
2011 Fall Planning Workbook	No Geological/Hydrological ORV.
2012 Preliminary Concepts Workbook and Draft Baseline Conditions Report	No Geological/Hydrological ORV.
2013 Draft Comprehensive Management Plan and EIS	No Geological/Hydrological ORV.
2014 Final Comprehensive Management Plan and EIS	No Geological/Hydrological ORV.

Reason for Change: ORV was removed as water quality is an established river value. Low-gradient and high-volume spring flows are not rare, unique, or exemplary.

Biological ORV

1986 Sierra National Forest Draft Forest Land and Resource Management Plan	No Biological ORV.
1996 Draft Yosemite Valley Housing Plan	Rare wildlife species and rare plant species listed (including *Myrica hartwegii*); Wawona Meadow rare—threatened plant community in California, contains high species diversity, wetlands, & specialized habitats.
2000 and 2005 Merced River Plans	Diversity of river-related species, wetlands, and riparian habitats; Special status species, including Wawona riffle beetle.
2008 Draft ORVs	Riparian and wetland habitats, rare and special-status plant and animal species: willow flycatcher, Sierra Nevada yellow-legged frog, harlequin duck, black swift, & Tompkin's sedge.
2010 Draft ORVs	Sierra sweet bay (*Myrica hartwegii*), a rare plant found exclusively on river banks in the central Sierra, occurs along the South Fork in this segment.
Spring 2011 Draft Baseline Conditions Report	No change.
2011 Fall Planning Workbook	The Sierra sweet bay (*Myrica hartwegii*) is a rare plant found along the South Fork Merced River.
2012 Preliminary Concepts Workbook and Draft Baseline Conditions Report	No change.
2013 Draft Comprehensive Management Plan and EIS	No change.
2014 Final Comprehensive Management Plan and EIS	No change.

Reason for Change: Diversity of river-related species, wetlands, and riparian habitats were removed as they are not rare, unique, or exemplary, with the exception of *Myrica hartwegii*. Special-status species, including Wawona riffle beetle, were removed because they are not river related or dependent.

Recreational ORV

1986 Sierra National Forest Draft Forest Land and Resource Management Plan	No Recreational ORV.
1996 Draft Yosemite Valley Housing Plan	Hiking, picnicking, camping, skiing, fishing, photography, swimming, nature study, horseback riding, biking, sightseeing, and boating.
2000 and 2005 Merced River Plans	Opportunities to experience a spectrum of river-related recreational activities, from nature study and photography to hiking.
2008 Draft ORVs	Hiking, backpacking, writing, contemplation, nature study, photography, artistic expression, fishing, camping, and picnicking--create memories, traditions, and bonding.
2010 Draft ORVs	Largely natural setting allowing visitors to easily connect with river; several pools and beaches; swimming, relaxing, and fishing; camping allows visitors to be close to river overnight.
Spring 2011 Draft Baseline Conditions Report	The largely natural setting of the river provides for memorable active, contemplative, and creative pursuits.
2011 Fall Planning Workbook	No Recreational ORV.
2012 Preliminary Concepts Workbook and Draft Baseline Conditions Report	No Recreational ORV.
2013 Draft Comprehensive Management Plan and EIS	No Recreational ORV.

2014 Final Comprehensive Management Plan and EIS	No Recreational ORV.

Reason for Change: The recreational ORV in this segment was removed because the representative activities are not rare, unique, or exemplary.

Scenic ORV

1986 Sierra National Forest Draft Forest Land and Resource Management Plan	No Scenic ORV.
1996 Draft Yosemite Valley Housing Plan	Views of Wawona Dome; the free-flowing river; historic vistas; view of confluence and cascades of Chilnualna Creek; confluence of Big Creek.
2000 and 2005 Merced River Plans	Views of Wawona Dome.
2008 Draft ORVs	Seasonal and daily changes, lighting on granite walls, domes, meadows, calm water, rushing cascades, scenic experience encourages interpretation and education.
2010 Draft ORVs	No Scenic ORV.
Spring 2011 Draft Baseline Conditions Report	No Scenic ORV.
2011 Fall Planning Workbook	No Scenic ORV.
2012 Preliminary Concepts Workbook and Draft Baseline Conditions Report	No Scenic ORV.
2013 Draft Comprehensive Management Plan and EIS	No Scenic ORV.
2014 Final Comprehensive Management Plan and EIS	No Scenic ORV.

Reason for Change: Views of Wawona Dome were removed as they are not rare, unique, or exemplary.

Cultural ORV

1986 Sierra National Forest Draft Forest Land and Resource Management Plan	No Cultural ORV.
1996 Draft Yosemite Valley Housing Plan	Over 60 prehistoric and historic archeology sites, traditional plant gathering; historic structures: Wawona hotel, pioneer historic center, Galen Clark homestead, Stella Lake; historic sites in Wawona Meadow.
2000 and 2005 Merced River Plans	Thousands of years of human occupation, including numerous prehistoric and historic Indian villages; historic sites, structures, and landscape features related to tourism, early Army and NPS admin, and homesteading.
2008 Draft ORVs	Trails along Merced for trade and cultural exchange for thousands of years, archeological sites, American Indian spiritual associations; covered bridge built by Galen Clark in 1868 as an open truss span (covered in 1875).
2010 Draft ORVs	Flowing through a broad basin, the South Fork Merced provided the water and location necessary for prehistoric settlements, for the African-American buffalo soldiers, and for more recent settlers, who left behind evidence of far-reaching traffic and trade, significant archeological sites, and one of very few covered bridges in the region.
Spring 2011 Draft Baseline Conditions Report	With its year-round water and level terrain for settlement, the Wawona Archeological District is composed of dense clusters of historic and prehistoric river-related sites that provide evidence of far-reaching traffic and trade. Physical remnants of U.S. Army Cavalry Camp A. E. Wood document the unique Yosemite legacy of the African-American Buffalo Soldiers, who founded their camps near the river's strategic water source and related ecological habitat. Built to connect human developments on both sides of the South Fork Merced River, the Wawona Covered Bridge is one of only a few covered bridges in the region.

2011 Fall Planning Workbook	The Wawona Archeological District encompasses numerous clusters of resources spanning thousands of years of occupation, including evidence of continuous, far-reaching traffic and trade. In this segment, remains of the U.S. Army Cavalry Camp A. E. Wood document the unique Yosemite legacy of the African-American Buffalo Soldiers and the strategic placement of their camp near the Merced River. The Wawona Covered Bridge is one of the few covered bridges in the region.
2012 Preliminary Concepts Workbook and Draft Baseline Conditions Report	No change.
2013 Draft Comprehensive Management Plan and EIS	The Wawona Archeological District encompasses numerous clusters of resources spanning thousands of years of occupation, including unusually rich evidence of continuous, far-reaching traffic and trade. In this segment, remains of the U.S. Army Cavalry Camp A.E. Wood document the unique Yosemite legacy of the African-American Buffalo Soldiers and the strategic placement of their camp near the Merced River. The Wawona Historic Resources ORV includes one of the few covered bridges in the region and the National Historic Landmark Wawona Hotel complex. The Wawona Hotel complex is the largest existing Victorian hotel complex within the boundaries of a national park, and one of the few remaining in the United States with this high level of integrity.
2014 Final Comprehensive Management Plan and EIS	Wawona Archeological District: no change. Wawona Historic Resources: The Wawona Historic Resources ORV includes one of the few covered bridges in the region and the National Historic Landmark Wawona Hotel complex, which is one of the largest existing Victorian hotel complexes in a national park, and one of the few remaining in the United States with this high level of integrity.

Reason for Change: The Wawona Archeological District was added as an independent ORV because it encompasses a complete interrelated landscape of archeological resources that must be managed as a district. This district spans Segments 5-8. Camp A.E. Wood was added as an independent ORV because it represents a specific archeological resource that merits protection under this plan.

SEGMENT 8: SOUTH FORK MERCED RIVER BELOW WAWONA (SQUIRREL CREEK TO WESTERN PARK BOUNDARY)

Geological/Hydrological Processes ORV

1986 Sierra National Forest Draft Forest Land and Resource Management Plan	The South Fork was not included in the 1986 ORVs.
1996 Draft Yosemite Valley Housing Plan	Transition from glaciated to un-glaciated canyon. Continual whitewater cascades and excellent water quality.
2000 and 2005 Merced River Plans	Transition from Paleozoic Era igneous to Cretaceous Period meta-sedimentary rock (among oldest in Sierra). Free-flowing river with continual white-water cascades
2008 Draft ORVs	Glacial processes. White water cascades in a deep, narrow canyon through a wild environment; rock fall-driven morphology resulting in deposition of enormous boulders, rapid snowmelt producing high-volume spring flows
2010 Draft ORVs	No Geological/Hydrological ORV.
Spring 2011 Draft Baseline Conditions Report	No Geological/Hydrological ORV.
2011 Fall Planning Workbook	No Geological/Hydrological ORV.
2012 Preliminary Concepts Workbook and Draft Baseline Conditions Report	No Geological/Hydrological ORV.
2013 Draft Comprehensive Management Plan and EIS	No Geological/Hydrological ORV.

2014 Final Comprehensive Management Plan and EIS	No Geological/Hydrological ORV.

Reason for Change: Transition from Paleozoic Era igneous to Cretaceous Period metasedimentary rock (among the oldest in the Sierra) was removed as it is not rare, unique, or exemplary. Free-flowing condition is an established river value. Additionally, white water cascades are not rare, unique or exemplary.

Biological ORV

1986 Sierra National Forest Draft Forest Land and Resource Management Plan	No Biological ORV.
1996 Draft Yosemite Valley Housing Plan	Rare plant species listed (but not Myrica hartwegii); rare wildlife species, including Wawona riffle beetle and rainbow trout.
2000 and 2005 Merced River Plans	Diverse riparian areas that are intact and undisturbed by humans; special-status species, including Wawona riffle beetle.
2008 Draft ORVs	Riparian and wetland habitats, rare and special-status plant and animal species: willow flycatcher, Sierra Nevada yellow-legged frog, harlequin duck, black swift, and Tompkin's sedge.
2010 Draft ORVs	Sierra sweet bay (*Myrica hartwegii*), a rare plant found exclusively on river banks in the central Sierra, occurs along the South Fork in these segments.
Spring 2011 Draft Baseline Conditions Report	No change.
2011 Fall Planning Workbook	The Sierra sweet bay (*Myrica hartwegii*), is a rare plant found along the South Fork Merced River.
2012 Preliminary Concepts Workbook and Draft Baseline Conditions Report	No change.
2013 Draft Comprehensive Management Plan and EIS	No change.
2014 Final Comprehensive Management Plan and EIS	No change.

Reason for Change: *Myrica hartwegii* was added because it is rare and river-dependent, found on the S. Fork river banks and those of a few other streams in the Sierra. Wawona riffle beetle was removed because it is not river related or dependent.

Recreational ORV

1986 Sierra National Forest Draft Forest Land and Resource Management Plan	No Recreational ORV.
1996 Draft Yosemite Valley Housing Plan	Fishing and wilderness inaccessibility and solitude.
2000 and 2005 Merced River Plans	Outstanding opportunities for river-related solitude, enjoyment of natural river sounds, primitive & unconfined recreation in an untrailed, undisturbed environment; river related recreation includes hiking, fishing, & white-water kayaking.
2008 Draft ORVs	Hiking, backpacking, writing, contemplation, nature study, photography, artistic expression, fishing, camping, and picnicking--create memories, traditions, and bonding.
2010 Draft ORVs	Hiking and backpacking, wilderness experiences, solitude, personal reflection, closeness to nature, independence, self-reliance, primitive travel, camping, exploration, & adventure; off-trail hiking and class V kayaking.
Spring 2011 Draft Baseline Conditions Report	The Merced River, spectacular High Sierra landscape, dramatic scenery, natural sounds, and abundant opportunities for solitude combine to produce a variety of exceptional wilderness-oriented recreational activities.

2011 Fall Planning Workbook	No Recreational ORV.
2012 Preliminary Concepts Workbook and Draft Baseline Conditions Report	No Recreational ORV.
2013 Draft Comprehensive Management Plan and EIS	No Recreational ORV.
2014 Final Comprehensive Management Plan and EIS	No Recreational ORV.

Reason for Change: The Recreation ORV was removed from this segment because the representative activities are not rare, unique, or exemplary.

Scenic ORV

1986 Sierra National Forest Draft Forest Land and Resource Management Plan	No Scenic ORV.
1996 Draft Yosemite Valley Housing Plan	Views of continual whitewater cascades in a deep and narrow canyon.
2000 and 2005 Merced River Plans	Views of continual white-water cascades in the deep and narrow river canyon in un-trailed, undisturbed environment.
2008 Draft ORVs	Seasonal and daily changes, calm water, rushing cascades, scenic experience encourages interpretation and education.
2010 Draft ORVs	Largely inaccessible; no trail crossings; unspoiled Sierra Nevada river valley views dominated by forest-cloaked hills, distant peaks, and an untamed river; some of the wildest views possible in the Sierra Nevada.
Spring 2011 Draft Baseline Conditions Report	Passing through an untrammeled forested wilderness, the South Fork Merced River forms the centerpiece of some of the Sierra's wildest scenery.
2011 Fall Planning Workbook	The South Fork Merced River passes through a vast area of exemplary and wild scenic beauty.
2012 Preliminary Concepts Workbook and Draft Baseline Conditions Report	No change.
2013 Draft Comprehensive Management Plan and EIS	No change.
2014 Final Comprehensive Management Plan and EIS	The South Fork Merced River passes through a vast area of natural scenic beauty.

Reason for Change: Views of continual white-water cascades in the deep and narrow river canyon in untrailed, undisturbed environment were removed because they are not rare, unique, or exemplary. The ORV was revised to include the overall scenic beauty of this segment of the river.

Cultural ORV

1986 Sierra National Forest Draft Forest Land and Resource Management Plan	No Cultural ORV.
1996 Draft Yosemite Valley Housing Plan	Archeological sites and historic properties.
2000 and 2005 Merced River Plans	Archeological sites and historic resources such as trail segments representing early cavalry activity.
2008 Draft ORVs	Trails along Merced for trade and cultural exchange for thousands of years, archeological sites, American Indian spiritual associations.
2010 Draft ORVs	No Cultural ORV.
Spring 2011 Draft Baseline Conditions Report	No Cultural ORV.

2011 Fall Planning Workbook	The Wawona Archeological District encompasses numerous clusters of resources spanning thousands of years of occupation, including evidence of continuous, far-reaching traffic and trade.
2012 Preliminary Concepts Workbook and Draft Baseline Conditions Report	No change.
2013 Draft Comprehensive Management Plan and EIS	No change.
2014 Final Comprehensive Management Plan and EIS	No change.

Reason for Change: This ORV was revised to include the entire Wawona Archeological District.

ALL SEGMENTS

Air Quality and Scientific Resource ORVs

Reason for Change: Air Quality was included as an ORV in the *1996 Draft Yosemite Valley Housing Plan* and was removed as it was determined to be inconsistent with Interagency Council criteria and not strictly river related or river dependent. The Scientific Resource ORV, also included in the 1996 housing plan and the 2000 and 2005 draft Merced River plans, was removed. It was determined that this ORV was vague and non-specific. Science is inherent to other specific values.

* The 2008 *Draft ORVs* were formulated under a "corridor-wide" scale. Examples were cited but not intended to be all inclusive.

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APPENDIX N

BIOLOGICAL ASSESSMENT

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APPENDIX N

BIOLOGICAL ASSESSMENT ON THE MERCED WILD AND SCENIC RIVER FINAL COMPREHENSIVE MANAGMENT PLAN AND ENVIRONMENTAL IMPACT STATEMENT

CHAPTER I. INTRODUCTION

Purpose and Need

The National Park Service in Yosemite has prepared the *Merced Wild and Scenic River Final Comprehensive Management Plan/ Environmental Impact Statement* (*Final Merced River Plan/EIS*) to provide a comprehensive management plan for the protection of the Merced River's free-flowing condition, water quality, and the values that make the river worthy of designation. The purpose of this Biological Assessment is to review the *Final Merced River Plan/EIS* in sufficient detail to determine effects of the plan on federal-listed threatened or endangered species, as well as species proposed for listing and species that are candidates to become proposed for listing. These species are also referred to as special-status species throughout this document. Listing status is defined as follows:

- Endangered – Listed under the Federal Endangered Species Act as being in danger of extinction within the foreseeable future throughout all or a significant portion of its range;
- Threatened – Listed under the Federal Endangered Species Act as likely to become endangered within the foreseeable future throughout all or a significant portion of its range;
- Proposed – Officially proposed in the Federal Register for listing under the Federal Endangered Species Act as endangered or threatened;
- Candidate – Candidate to become a proposed species.

The *Final Merced River Plan/EIS* aims to protect and enhance river values within the river corridor, achieve broad restoration goals for natural and cultural resources, and provide for public use and enjoyment of the river resource. Site-specific actions in the plan inform future management within the river corridor and support a reduction in crowding and congestion on roadways, better and more efficiently organize parking and day-use activity areas, and improve intersections to deal with pedestrian / vehicle conflicts. Under the final preferred alternative 186.44 acres would be restored to natural conditions and numerous major facilities would either be removed or relocated outside the river corridor, while opportunities for river-related recreational experiences, like camping, are expanded.

This Biological Assessment will evaluate the final preferred alternative (Alternative 5) as revised in the *Final Merced River Plan/EIS*. All river segments will be affected by the final preferred alternative; however, the focus of this assessment will be on East and West Yosemite Valley, Wawona, Merced Lake High Sierra Camp, El Portal, Abbieville and Old El Portal.

This Biological Assessment will:

- Evaluate and document the effects of the final preferred alternative on special-status species or their critical habitat that are known to be or could be present within the river corridor
- Determine the need for consultation and conference with the U.S. Fish and Wildlife Service (USFWS)
- Conform to requirements of the Endangered Species Act (19 USC 1536 [c], 50 CFR 402) and the National Environmental Policy Act (42 USC 4321 et seq., implemented at 40 CFR Parts 1500-1508)

U.S. Fish and Wildlife Service Consultation

The Endangered Species Act (Section 7 [a][2]) directs federal agencies to consult with the responsible agency (in this case, the USFWS) to determine whether proposed actions are likely to jeopardize the continued existence of a listed species or destroy or adversely modify critical habitat. The NPS initiated informal consultation with the USFWS and obtained an updated species list on October 18, 2012. Federally-listed endangered or threatened species *may be present* or *may be affected* by actions proposed in the *Final Merced River Plan/EIS* within the Mount Lyell, Merced Peak, Sing Peak, Timber Know, Half Dome, El Capitan, Wawona, Mariposa Grove, El Portal, and Kinsley U.S. Geological Survey quadrangles.

Based on these lists provided by USFWS, park staff – using best professional judgment – refined the assumptions regarding the potential for presence or absence of federally listed species and determined that seven federally listed species have been identified as known to occur or as having the potential to occur in the study area: one invertebrate species, two amphibian species, three mammal species, and one plant species (see Table N-1). Consultation with the USFWS will commence with presentation of the Biological Opinion and signing of the Record of Decision. Consultation will continue as projects are implemented over the next 20 to 30 years.

TABLE N-1: SPECIES CONSIDERED IN THIS BIOLOGICAL ASSESSMENT

Federal Endangered Species
Mammals
Sierra Nevada bighorn sheep *(Ovis canadensis californiana)*
Federal Threatened Species
Invertebrates
Valley elderberry longhorn beetle *(Desmocerus californicus dimorphus)*
Federal Candidate Species
Mammals
California wolverine (*Gulo gulo*)
Pacific fisher *(Martes pennanti pacifica)*
Reptiles and Amphibians
Yosemite toad *(Anaxyrus canorus*)
Sierra Nevada yellow-legged frog (*Rana sierrae*)
Plants
Whitebark pine (*Pinus albicaulis*)

Federally –Listed Species Evaluated in this Biological Assessment

The Endangered Species Act defines an "endangered species" as any species that is in danger of extinction throughout all, or a significant portion, of its range. A "threatened species" is defined as any species that is likely to become an endangered species within the foreseeable future throughout all, or a significant

portion, of its range. Of the Federally-listed species that could be affected by the *Final Merced River Plan/EIS*, only one is endangered: Sierra Nevada bighorn sheep *(Ovis canadensis sierrae)*; and only one is threatened: Valley elderberry longhorn beetle *(Desmocerus californicus dimorphus)*.

The Sierra Nevada bighorn sheep formerly ranged throughout the high elevations of the Sierra Nevada. By the beginning to the 20th century, however, their numbers had been decimated by overhunting, competition for forage with domestic sheep, and especially by diseases contracted from domestic sheep. By 1999, fewer than 200 Sierra Nevada bighorn sheep were left in the entire range, prompting its listing that year as endangered. Currently, the Sierra Nevada bighorn sheep occurs primarily along the Sierra Crest in the northeast portion of Yosemite National Park. Most of the herd inhabits Inyo National Forest Service land adjacent to the park.

The Valley elderberry longhorn beetle was listed by the USFWS as threatened on August 8, 1980. This listing was primarily a result of destruction of riparian habitat in the San Joaquin Valley that removed the beetle's host plant, the elderberry (*Sambucus* sp.). Critical habitat has been designated for the beetle in two areas: along the American River near the Sacramento metropolitan area and along Putah Creek in Solano County. However, the beetle also occurs up to 3,000 feet in elevation in the Sierra Nevada.

Proposed Federally-Listed Species

Proposed species are any species of fish, wildlife or plant that is proposed in the Federal Register to be listed under Section 4 of the Endangered Species Act. No species proposed for listing would be affected by the final preferred alternative.

Candidate Federally-listed Species

Candidate species are plant and animal taxa considered for possible inclusion for listing under the Endangered Species Act. These are taxa for which the USFWS has on file sufficient information on biological vulnerability and threat(s) to support issuance of a proposal to list, but issuance of a proposed rule is currently precluded by higher priority listing actions (61 FR 7596-7613). Candidate species for federal listing that could be affected by the *Final Merced River Plan/EIS* include California wolverine (*Gulo gulo*), Pacific fisher (*Martes pennant pacifica*), Yosemite toad (*Anaxyrus canorus*), Sierra Nevada yellow-legged frog (*Rana sierrae*), and whitebark pine (*Pinus albicaulis*).

Federally-Listed Species Eliminated from Further Analysis

The following species are on the list of "Endangered and Threatened Species that may occur or be Affected by Projects in the USFWS 7 ½ Minute Quads" that was provided by the USFWS. However, the National Park Service has determined that they would not be affected by the *Final Merced River Plan/EIS* because they do not occur in the project area nor were they historically found in the project area. Therefore, there is no effect on these species from the final preferred alternative, nor are they potentially indirectly or cumulatively affected by the plan. The following species will not be evaluated further in this Biological Assessment.

- **Delta smelt, *Hypomesus transpacificus*** (Federal Threatened)

- **Lahontan cutthroat trout, *Oncorhynchus (=Salmo) clarki henshawi*** (Federal Threatened)
- **Paiute cutthroat trout, *Oncorhynchus (=Salmo) clarki seleniris*** (Federal Threatened)
- **Central Valley steelhead, *Oncorhynchus mykiss*** (Federal Threatened)
- **California red-legged frog, *Rana draytonii*** (Federal Threatened)

Critical Habitat

Critical habitat is a specific area or type of area that is considered to be essential for the survival of a species, as designated by the USFWS under the Endangered Species Act. Critical habitat was proposed as of May 2013 in Yosemite National Park for the Sierra Nevada yellow-legged frog and Yosemite toad. No critical habitat exists in the El Portal Administrative Site.

CHAPTER II. CURRENT MANAGEMENT DIRECTION

Authorities

The following legislation and policies address the management of special-status species in the park: the National Park Service Organic Act, the Endangered Species Act, the National Environmental Quality Act, the California Endangered Species Act, the Migratory Bird Conservation Act, the Fish and Wildlife Coordination Act, the Wild and Scenic Rivers Act, and the Wilderness Act.

The USFWS normally takes the lead departmental responsibility of coordinating and implementing provisions of the Federal Endangered Species Act for all listed endangered, threatened, and candidate species. This Biological Assessment is prepared in accordance with Section 7 of the Federal Endangered Species Act of 1973, as amended, as part of the consultation process with the USFWS.

Policy and Program Objectives

The following National Park Service policies and program objectives prescribe the management of special-status species:

- The *Natural Resources Management Guideline* NPS-77 (1991) states:

  "Management affects the distribution, abundance, and ecological relationships of and among species. Whereas preservation can be accomplished by a zoo, botanical garden, or other non-natural refugium, the National Park Service's goal is the long-term preservation of species and their ecological role and function as part of a "natural ecosystem." It is, therefore, critical that ecological aspects of management prevail in dealing with threatened and endangered species. An understanding of factors limiting the distribution and abundance of the species of concern must be well understood and incorporated into any management action."

- National Park Service *Management Policies* (1988) states:

  "Consistent with the purposes of the Endangered Species Act (16 USC 1531 et seq.), the National Park Service will identify and promote the conservation of all federally listed threatened, endangered, or candidate species within park boundaries and their critical habitats."

  "The National Park Service also will identify all state and locally listed threatened, endangered, rare, declining, sensitive, or candidate species that are native to and present in the parks, and their critical habitats. These species and their critical habitats will be considered in National Park Service planning activities."

- The 1980 *General Management Plan* for Yosemite states:

  "Protect threatened and endangered plant and animal species and reintroduce, where practical, those species eliminated from the natural ecosystems."

CHAPTER III. THE FINAL MERCED RIVER PLAN/EIS

The Final Preferred Alternative – Enhanced Visitor Experiences and Essential Riverbank Restoration (Alternative 5)

The final preferred alternative would include significant restoration within 100 feet of the river and in meadow and riparian areas, maintaining daily visitation in Yosemite Valley to accommodate the same peak levels observed in recent years, reducing unnecessary facilities and services, and converting facilities from administrative use to public use where feasible. This alternative would restore approximately 186.44 acres of currently disturbed or developed habitats throughout the Merced River corridor to natural conditions by removing infrastructure and development from sensitive areas such as meadows, riparian habitat, and riverbanks. Much of the development within 100 feet from the ordinary high-water mark of the Merced River would be removed under this alternative. 6,135 linear feet of riprap would be removed from the banks of the Merced River. Targeted infrastructure within the bed and banks of the river would be removed such as rip-rap, obsolete bridge abutments, and some Housekeeping Camp lodging units. In order to promote the free-flowing conditions of the river, channel complexity would be enhanced below Stoneman and Ahwahnee Bridges. Restoration actions also include filling ditches and removing informal trails from meadows to improve hydrology and reduce meadow fragmentation. Collectively, these actions would enhance meadow and floodplain connectivity and the free-flowing condition of the river.

Actions to manage visitor use and facilities under Alternative 5, specifically those concerning vehicle access and overnight accommodations, would result in a 5% increase in lodging accommodations. The campsite inventory would increase by 36% in the Merced River corridor and 37% in Yosemite Valley. All campsites within 100 feet of the river would be removed. Campsite losses would be offset with the addition of new camping adjacent to Upper Pines Campground and east of the Camp 4 Campground, as well as new sites west of Backpackers Campground and in the former Upper and Lower Rivers Campground area. Under Alternative 5, there would be a net increase of 19% in Yosemite Valley overnight use. This would largely result from the increase in units at Curry Village. Management actions related to lodging would focus on removing lodging from the ordinary high-water mark and Housekeeping Camp, and slightly reducing lodging in wilderness. Some tent cabins in the Boys Town area would be replaced with hard-sided lodging in Curry Village to increase the availability of year-round accommodations.

Alternative 5 would restore approximately 189 acres of vegetation, including 37.98 acres of wetlands, as a result of actions common to Alternatives 2-6 in conjunction with actions specific to Alternative 5.

For a detailed description of the Preferred Alternative, refer to Vol. I, Chapter 9 of the *Merced River Plan/EIS*.

CHAPTER IV. EXISTING ENVIRONMENT

Habitat Descriptions

The Merced River and Yosemite National Park

The Merced River is one of 23 wild and scenic rivers in California and one of six wild and scenic rivers on the western slope of the Sierra Nevada. It is one of 15 major river systems in the Sierra Nevada mountain range of California. Originating in the alpine peaks of the central Sierra Nevada, the river flows west for 145 miles to its confluence with the San Joaquin River in the Central Valley of California, encompassing a drainage basin of about 1,700 square miles. The first 122 miles of the Merced River, beginning at its Sierran headwaters, are designated as wild and scenic; the National Park Service manages 81 miles of the river through Yosemite National Park and the El Portal Administrative Site, including both the main stem and the South Fork Merced River (together referred to as *the Merced River*). In Yosemite National Park, the main stem of the Merced River flows freely through a wilderness landscape of alpine peaks, glacially carved valleys, and high-elevation meadows. As the gradient lessens into Yosemite Valley, the Merced River meanders through the rich meadow and riparian habitat. These wetlands and riparian areas are distinct and important types of vegetation communities that contribute to the outstandingly remarkable biological river values as well as values to biological communities.

Yosemite National Park, one of the largest and least-fragmented habitat blocks in the Sierra Nevada range, supports a diverse and abundant assemblage of wildlife. It plays an important role in protecting the long-term survival of certain species and the overall biodiversity of wildlife in the Sierra Nevada region. The Merced River corridor also serves an essential ecological role in linking wildlife habitats across the park's landscape and gradients of elevation.

Yosemite Valley is a glacier-carved valley with sheer granite cliffs rising over 2,000 feet above the valley floor. Alluvial deposits are found to a depth of about 2,000 feet below the soil surface, creating a huge underground aquifer. Habitats in Yosemite Valley can be loosely grouped into meadow, riparian, and upland. Mammals resident or transient in Yosemite Valley include deer mouse, California ground squirrel, western gray squirrel, broad-footed mole, Botta's pocket gopher, mink, ringtail, raccoon, coyote, bobcat, mule deer, mountain lion, and black bear.

Regional Vegetation and Habitats

The major vegetation zones of the Sierra Nevada region form readily apparent, large-scale, north-south elevational bands along the axis of the Sierra Nevada range. In the Yosemite region, these vegetation zones include foothill-woodland, lower montane forest, upper montane forest, subalpine forest, and alpine zones; they are distributed from the lowest elevations on the western boundary of the park to the highest elevations from 9,500 feet along the crest of the Sierra Nevada range. Major east-west watersheds that dissect the Sierra Nevada range into steep canyons form a secondary pattern of vegetation.

Merced River Habitats

All eight major vegetation types supported by Yosemite National Park occur within the Merced River corridor and are presented in Table N-2, below. It is estimated that half of all plant species in the park occur

TABLE N-2: VEGETATION TYPES WITHIN THE MERCED RIVER CORRIDOR

Vegetation Type	Area per Segment (acres)								Total
	1	2	3	4	5	6	7	8	
Alpine (9,500 to 11,800 feet)*	87.8	0	0	0	6.5	0	0	0	94.3
Meadow (2,000 to 11,000)	1,801.3	324.1	67.6	28.8	389.0	0	140.6	0.9	2,752.3
Chaparral (2,000 to 10,000 feet)	1,669.1	991.4	2,270.6	74.9	694.0	0	166.4	66.6	5,933.0
Subalpine Coniferous Forest (8,000 to 9,500 feet)	9,610.4	45.8	0	0	3,108.9	0	0	0	12765.1
Upper Montane Coniferous Forest (6,000 to 8,000 feet)	16,525.7	3,697.0	1,572.0	0	11,611.8	23.3	990.5	28.4	34,448.7
Lower Montane Coniferous Forest (3,000 to 6,000 feet)	3,505.6	7,248.5	4,785.3	151.4	6,010.4	72.0	4,969.0	1,980.8	28,723.0
Lower Montane Broadleaf Forest (3,000 to 6,000 feet)	461.6	3,331.4	2,982.7	569.7	816.7	3.4	761.1	397.0	9,323.6
Foothill Woodland (1,800 to 3,000 feet)	0	0	9.8	324.8	0	0	0	0	334.6
Barren (1,800 to 11,800 feet)	14,143.4	2,319.5	455.7	27.6	2586.4	2.9	170.2	2.6	19,708.3
Developed	0.3	150.0	59.3	54.5	8.1	0.2	82.2	10.3	364.9

NOTE: *Elevation ranges are approximated

SOURCE: NPS 1997; NPS 2007x

within the Merced River corridor. *Status of Rare Plants in the Merced River Corridor within Yosemite National Park* (Colwell and Taylor, 2011) concluded that the characteristic pattern of special-status species occurrence along the Merced River corridor within Yosemite National Park was found to be within unique habitat types that are often restricted in size. These habitat types are typically associated with specific kinds of water availability, such as waterfall spray zones, braided river channel oxbow cutoffs, gravel bars resulting from periodic flooding, water seepage on rock walls, vernal pools resulting from snowmelt flooding, and the average high water margin of streams and rivers. Although riparian and wetland habitats are not classified independently under the eight broad-scale vegetation types used in the parkwide vegetation map of the Merced River Plan/EIS, their value as biological communities warrants a thorough discussion. Therefore, they are discussed in-depth below. Additionally, because meadow habitats are integral in connecting upland and aquatic habitats, they are also discussed in-depth in this assessment.

Meadows. Meadow habitats within the Merced River corridor include alpine, subalpine, and montane meadows and seeps. The meadows in Yosemite National Park play a particularly critical role in the Merced River ecosystem. There are approximately 2,752.3 acres of meadow habitat within the Merced River corridor. Meadows serve as a transition zone, linking aquatic and riparian habitats along the Merced River to drier upland habitats such as California black oak. High spring flows create wet areas in side channels, low-lying wetlands, meadows, and cutoff channels. These areas support the concentration of organic matter, nutrients, microorganisms, and aquatic invertebrates throughout the relatively dry summer. When

the flush of winter or spring flooding occurs, this stored aquatic biomass is washed into the main river channel, forming the base of the aquatic food chain.

Meadows in Yosemite Valley were maintained in the past by natural flooding and by frequent, low-intensity broadcast fires set by Native American residents of the Valley. Today, prescribed fire is used as a tool to clear the meadows of encroaching conifers and release nutrients into the soil.

Riparian Habitats. There are approximately 180.7 acres of riparian habitat within the Merced River corridor. Riparian zones extend outward from the banks of the Merced River and its tributaries toward adjacent meadow and forest communities. Broadleaf deciduous trees such as white alder, black cottonwood, and willow characterize riparian zones in Yosemite Valley. Riparian vegetation along moving water is frequently disturbed and constantly responds to the deposition and removal of soil. Riparian vegetation actively colonizes new areas and is made up of a wide range of ages and types of vegetation. This in turn provides a wide range of foraging, nesting, and resting opportunities for wildlife.

Upland Habitats. Upland plant communities are found where soil moisture conditions are average to dry and where soils are not periodically flooded or saturated. Upland habitats within the Merced River corridor are comprised of Chaparral, Foothill Woodland, Lower Montane Broadleaf Forest, Lower Montane Coniferous Forest, Subalpine Coniferous Forest, Alpine, and Barren (Table N-2, above). In-depth descriptions of each habitat type within each segment of the Merced River are described in Chapter 9 of the Merced River Plan/EIS.

Segment 1

At its headwaters, the Merced River begins in the lower alpine/subalpine forest zone. The river then descends through the upper montane forest zone and concludes in Little Yosemite Valley within the lower montane forest zone. Vegetation in the upper main stem river corridor is classified into seven broad vegetation types: meadow, chaparral, lower montane broadleaf forest, lower montane coniferous forest, upper montane coniferous forest subalpine coniferous forest, and alpine plant communities.

Segment 2

Yosemite Valley is a broad, flat-bottomed valley formed by glaciation and subsequent alluvial deposition. The river corridor includes the Merced River in addition to portions of Illilouette Creek, Tenaya Creek, Yosemite Creek, Sentinel Creek, Ribbon Creek, and Bridalveil Creek. Upland habitats cover about 75% of Yosemite Valley and are dominated by mixed conifer, canyon live oak, California black oak, and microhabitats on steep granite walls (Acree 1994).

Mixed conifer communities in Yosemite Valley are typically dominated by ponderosa pine, but may have significant numbers of incense-cedar, Douglas-fir, white fir, California black oak, and an occasional sugar pine. The mixed conifer community is naturally adapted to low-intensity, frequent fires. Nearly 100 years of fire suppression has resulted in a change from open forest to dense thickets of shade-tolerant tree species such as incense-cedar and white fir. Under natural conditions, the return interval for fire is estimated at 8 to 12 years (NPS 1990). Most undeveloped, mixed conifer areas of Yosemite Valley are now managed through a combination of mechanical removal of hazardous fuel and prescribed burning. These treatments simulate the natural and Native American – maintained fire regimes of the Valley and help decrease forest densities to more natural levels.

Canyon live oak communities grow on both north- and south-facing talus slopes. They often form pure or almost pure stands. Fires in this community are infrequent but intense, with a fire return interval of 20 to 50 years on south-facing slopes. Most trees and shrubs in this community resprout after fires.

In addition to being a component of the mixed conifer community, California black oaks in Yosemite Valley form pure, open stands of large trees with a herbaceous understory. These pure stands are found between the upland forest communities and lower-lying meadow and riparian communities. These stands are unique to the Valley due to thousands of years of Native American activities, including annual burning and removal of young conifers. California black oaks also grow in dense stands on talus slopes near drainages.

Segment 3 and 4

The Merced River gorge travels through the lower montane forest zone and into the foothill-woodland zone, where it enters the El Portal area. Vegetation in the Merced River gorge and El Portal river corridor is classified into four broad vegetation types: chaparral, foothill woodland, lower montane broadleaf forest, and lower montane coniferous forest. Valley oak woodland (foothill woodland) occurs in the El Portal area.

El Portal lies in the Merced River canyon at 2,000 feet in elevation. The Merced River in this segment is lined with a narrow band of riparian vegetation with occasional wider floodplains. A dense mosaic of chaparral and foothill woodland communities lines the steep canyon walls. Many factors shape this unique biological environment, including natural floods and lightning-ignited fire. Soils derived in the contact zone between metamorphic and granitic rock form a unique substrate for vegetation. Many special-status plants are concentrated in this unique area. Steep canyon walls that are almost inaccessible to human passage create secluded refuges for wildlife. Extremely hot and dry summer weather places a critical importance on riparian habitat for many wildlife species.

Segments 5 and 8

These segments include nearly a full range of environments typical to the Sierra Nevada. Vegetation zones along the upper South Fork (Segment 5) include the alpine, subalpine, upper montane forest, and lower montane forest zones. Vegetation in the upper South Fork is classified into six broad vegetation types: meadow, chaparral, lower montane broadleaf forest, lower montane coniferous forest, upper montane coniferous forest and subalpine coniferous forest.

Vegetation zones along the lower South Fork (Segment 8) include the lower montane forest and foothill-woodland zones. Vegetation in the lower South Fork is classified into three broad vegetation types: chaparral, lower montane broadleaf forest, and lower montane coniferous forest. These segments of the river are designated as wilderness.

Segments 6 and 7

Major vegetation zones in the central South Fork (Wawona) include the upper montane forest and lower montane forest zones. Vegetation in the central South Fork is classified into four broad categories: meadow, chaparral, lower montane broadleaf forest, and lower montane coniferous forest.

Species Accounts

TABLE N-3: PRESENTS A SUMMARY OF SPECIAL-STATUS WILDLIFE AND PLANT SPECIES ADDRESSED IN THIS ANALYSIS

Scientific Name Common Name	Listing Status	General Habitat	Potential to Occur in Project Area Segment
Invertebrates			
Desmocerus californicus dimorphus Valley elderberry longhorn beetle	FT	Breeds and forages exclusively on elderberry shrubs (*Sambucus* spp.) typically associated with riparian forests, riparian woodlands, elderberry savannas, and other Central Valley and foothill habitats below 3,000 feet in elevation.	3,4,
Amphibians			
Anaxyrus canorus Yosemite toad	FC	Restricted to wet mountain meadows, lakes, ponds, and shallow spring channels in the central high Sierra Nevada, between 4,790 - 11910 feet. Wet meadow habitat is the focal habitat for this species	1,5
Rana sierrae Sierra Nevada yellow-legged frog	FC	High mountain lakes, ponds, tarns and streams at elevations ranging from 5,500 to 12, 000 feet; rarely found more than 3 feet from water.	1,5
Mammals			
Gulo gulo California wolverine	FC	Habitats used in the southern Sierra Nevada include red fir, mixed conifer, lodgepole, subalpine conifer, alpine dwarf-shrub, barren, wet meadows, montane chaparral, and Jeffrey pine, from 6,400 to 10,800 feet. Uses caves, hollows in cliffs, logs, rock outcrops, and burrows for cover and denning.	1,5
Martes pennanti pacifica Pacific fisher	FC	Dens and bears young in the cavities of large trees or snags and strongly associated with mid-elevation mature and late successional coniferous or mixed forests. Generally found in stands with high canopy closure, large trees and snags, large woody debris, large hardwoods, and multiple canopy layers.	1,2,5,7
Ovis canadensis sierrae Sierra Nevada bighorn sheep	FE	Occurs primarily along the Sierra Crest in the northeast portion of the park. Most of the herd inhabits Forest Service land adjacent to the park.	5
Plants			
Pinus albicaulis Whitebark pine	FC	Cold, windy high elevation sites between 3,000 meeters-3,750 meters	1,2,5

STATUS:
FE – Federal Endangered
FT – Federal Threatened
FC – Federal Candidate

SOURCE: Special Status Wildlife Species Report for the Merced River Corridor in Yosemite National Park (Espinoza et al., 2011)
Status of Rare Plants in the Merced River Corridor within Yosemite National Park (Colwell and Taylor, 2011)

Federal Endangered Species

Mammals

Sierra Nevada bighorn sheep
Ovis canadensis sierrae

Status. Federal Endangered

General Distribution. Sierra Nevada bighorn sheep use habitats ranging from the highest elevations along the crest of the Sierra Nevada (4,000 meters [13,120 feet]) to winter ranges at the eastern base of the range as low as 1,450 meters (4,760 feet) (USFWS 2007). The Sierra Nevada bighorn sheep population has increased from a low of 100 individuals in 1995 to more than 400 animals since the species was listed as endangered under the federal ESA in 1999. The Yosemite Recovery Unit consists of approximately 40 individuals at high elevations along the northeastern section of Yosemite.

Habitat Requirements. Habitats used by Sierra Nevada bighorn sheep include alpine dwarf-shrub, low sage, sagebrush, bitterbrush, pinyon-juniper, palm oasis, desert riparian, desert succulent shrub, desert scrub, subalpine conifer, perennial grassland, montane chaparral, and montane riparian (DeForge 1980, Monson and Sumner 1980, Wehausen 1980). Bighorn sheep use rocky, steep terrain for escape and bedding and remain near rugged terrain while feeding in open habitat (Zeiner et al. 1990). Low-elevation winter ranges provide this species an important source of high quality forage early in the growing season (USFWS 2007). They use steep, rugged slopes and canyons for lambing areas (Wehausen 1980).

Status in Merced River Corridor. Historically, bighorn sheep occupied alpine and subalpine areas along the Sierra Crest and in the Cathedral Range. It is generally believed that they seasonally migrated from the crest to winter on the eastern escarpment. Given that they occupied the Cathedral Range, it is very likely that bighorn sheep historically occupied the upper reaches of the Merced River drainage. A Museum of Vertebrate Zoology specimen was taken from the east lobe of Lyell Glacier within 1 kilometer (0.62 mile) of the Merced River corridor in October 1933. Another specimen was taken within 3 kilometers of the river corridor east of Crescent Lake near Wawona in 1921 (Museum of Vertebrate Zoology Database 2011). In 1976, a bighorn sheep was sighted near Donohue Pass, approximately 3.5 kilometers northeast of the Merced River corridor (Yosemite Wildlife Observation Database 2011). Although rams might occasionally (rarely) wander into the upper (along the crest) Merced River drainage, it is highly unlikely that bighorn sheep currently occupy the Merced River drainage (Chow, pers. comm.). In addition, bighorn sheep critical habitat (designated in 2008 by USFWS) does not occur within the Merced River corridor.

Federal Threatened Species

Invertebrates

Valley elderberry longhorn beetle
Desmoscerus californicus dimorphus

Status. Federally threatened

General Distribution. The valley elderberry longhorn beetle is found in areas below 915 meters (3,000 feet) in elevations that support species of elderberry (*Sambucus* sp.). At the time of listing in 1980, the beetle was known from fewer than 10 locations on the American River, Putah Creek, and Merced River. Current distribution ranges from southern Shasta County to Fresno County.

Habitat Requirements. The valley elderberry longhorn beetle is an invertebrate species that is completely dependent on its host plant, elderberry, throughout its one-year to two-year life cycle. The beetle spends most of its life in the larval stage, living in the stems of elderberry shrubs. Adults emerge from late March through June, when feeding and mating occurs, about the same time the elderberry flowers. The adult stage is short-lived; females lay their eggs on the bark, larvae hatch and burrow into the stems, and the cycle is repeated. Although elderberry shrubs are relatively common in riparian habitat, it appears that to serve as suitable habitat, shrubs must have stems that are 1 inch or greater in diameter at ground level (Barr 1991). Use of elderberry by the beetle is rarely apparent. Frequently, the only exterior evidence of the use by the beetle is a distinct exit hole created by the larva just before the pupal stage.

Status in Merced River Corridor. The El Portal Administrative Site is the only area in Yosemite National Park that lies below 915 meters (3,000 feet) in elevation. In El Portal, elderberry plants represent a subdominant species within live oak forests, interior live oak forests, interior live oak woodlands, blue oak woodlands, canyon live oak forests, mixed north slope forests, foothill pine/live oak/chaparral woodlands, northern mixed chaparral, interior live oak chaparral, and westside ponderosa pine forests. Elderberry shrubs are scattered throughout the El Portal Administrative Site.

Federal Candidate Species

Amphibians

Yosemite toad
Anaxyrus canorus

Status. Federal candidate

General Distribution. The historic range of Yosemite toads in the Sierra Nevada occurs from the Blue Lakes region north of Ebbetts Pass (Alpine County) to 5 kilometers (3.1 miles) south of Kaiser Pass in the Evolution Lake/Darwin Canyon area (Fresno County) (Jennings and Hayes 1994). Historically, the toad ranged from 1,460 meters to 3,630 meters (4,790 feet to 11,910 feet) in elevation (Stebbins 1985) throughout its range and from 1,950 meters to 3,444 meters (6,400 feet to 11,300 feet) in elevation in Yosemite (Karlstrom 1962). The toad is currently known from 179 sites in Yosemite between the elevations of 2,134 meters to 3,505 meters (7,000 feet to 11,500 feet) (Knapp 2003). Estimates suggest that the toad has disappeared from between 47% and 79% of the sites that it previously occupied (Jennings and Hayes 1994, Drost and Fellers 1996). Remaining populations appear more scattered across the landscape and consist of a small number of breeding adults (Kagarise Sherman and Morton 1993).

The NPS surveyed 446 meadows for Yosemite toads during the summer of 2010, 166 of which had been surveyed at least once between 1992 and 2009. The remaining 280 meadows had never been surveyed. The surveys documented 44 new breeding populations of toads, and increased the number of documented breeding populations from 135 to 179. Toads were not found in approximately 50% of the sites where toads

had been previously documented, while 9% of meadows where toads had not been documented previously had breeding during the 2010 survey.

Habitat Requirements. The Yosemite toad has been recorded in a broad range of high montane, subalpine, and alpine habitats, including wet meadows, lakes, ponds, and shallow spring channels. The Yosemite toad is most commonly found, however, in shallow, warm water areas, including standing and flowing water in wet meadows, small permanent and ephemeral ponds, and flooded shallow grassy areas and meadows adjacent to lakes (Karlstrom 1962). Wet meadow habitat is the focal habitat for this species.

Status in the Merced River Corridor. Yosemite toad observations have been recorded on 2,142 occasions in Yosemite. Of these observations, 11 records are from the Merced River corridor. There are no records of Yosemite toads within the Merced River corridor prior to 1999, which is likely due to a lack of survey efforts targeting the toad. Between 1999 and 2010, there were a multiple sightings at higher elevation sites around Triple Divide, Isberg, and Rodgers peaks.

Sierra Nevada yellow legged frog
Rana sierrae

Status. Federal candidate

General Distribution. Sierra Nevada yellow-legged frogs currently range from north of the Feather River in northern Plumas County, California, south, including all of Yosemite, to the divide between the South and Middle Forks of the Kings Rivers in Kings Canyon National Park. The majority of their range is in federally designated wilderness. Despite the fact that most of their habitat is fully protected, the Sierra Nevada yellow-legged frog has disappeared from >93% of their historic range. The declines have escalated since the late1970s, and most of the remaining populations are much smaller than those that would have occurred historically (Knapp 2005). Consequently, the Sierra Nevada yellow-legged frog has gone from being one of the most abundant species in the Sierra Nevada (Grinnell and Storer 1924) to one that is considered critically endangered. This species is currently known to occur at approximately 166 sites in Yosemite at elevations ranging from 1,676 meters to 3,536 meters (5,500 feet to 11,600 feet). The Sierra Nevada yellow-legged frog is a candidate species for listing under the federal ESA, and the USFWS plans to initiate a proposed rule to list this species in 2013. A listing decision would occur within 12 months of proposed ruling.

Habitat Requirements. The Sierra Nevada yellow-legged frog occupies aquatic habitats for almost all of their seasonal life history; they breed, tadpoles develop, and they overwinter in lakes and ponds or low-flowing streams and use flowing water to move between sites. This species is rarely found more than a few feet from water. Because it overwinters in water and has a multi-year tadpole phase, it requires waters that are deep enough that they don't freeze solid in the winter and they don't dry out during the summer.

Status in the Merced River Corridor. Sierra Nevada yellow-legged frog observations have been recorded on 4,581 occasions in Yosemite. Of these observations, 20 records are from the Merced River corridor. Most of the sites where Sierra Nevada yellow-legged frogs are known to exist fall outside of the Merced River corridor. Concerted efforts to survey amphibians in the park have been conducted between 1992 and 2010. Before 1992, there were five records of Sierra Nevada yellow-legged frogs within the river corridor at Wawona (1922), Yosemite Valley (1922, 1958), Triple Peak (1940), and Horsethief Canyon (1991). One of the historic records from Yosemite Valley may have been from farther up Tamarack Creek rather than from

the Valley. During a comprehensive survey of all mapped and unmapped lakes and ponds in Yosemite conducted in 2000–2002, Knapp (2005) observed Sierra Nevada yellow-legged frogs at 13 sites around Red and Rodgers peaks. A total of 30 adults or subadults and about 1400 tadpoles were recorded at these sites. Between 1992 and 2010, there were two additional observations in the upper reaches of the Merced River.

Mammals

California Wolverine
Gulo gulo luteus

Status. Federal candidate

General Distribution. The California wolverine is an uncommon resident of north Coast Range mountains and the Sierra Nevada. Sightings range from Del Norte and Trinity counties east through Siskiyou and Shasta counties, and south through Tulare County (Zeiner et al. 1990). Wolverines have not been scientifically confirmed in California since the 1920s, but a remote camera sighting detected an individual wolverine in Tahoe National Forest in March 2008.

Habitat Requirements. Habitats used by the California wolverine in the southern Sierra Nevada include red fir, mixed conifer, lodgepole, subalpine conifer, alpine dwarf-shrub, barren, wet meadows, montane chaparral, and Jeffrey pine, while their elevation range in the southern Sierra Nevada is 2,000 meters to 3,400 meters (6,400 feet to 10,800 feet) (Zeiner et al. 1990). The wolverine uses caves, hollows in cliffs, logs, rock outcrops, and burrows for cover and denning, generally in denser forest stages (Zeiner et al. 1990). The wolverine may dig dens in the snow. Wolverines are hunters and scavengers and feed primarily on small mammals and carrion but might kill large snowbound prey (Grinnell et al. 1937, Ingles 1965). Wolverines have extremely large home ranges; in Montana, their yearly home range was 422 km^2 (156 mi^2) for males and 388 km^2 (144 mi^2) for females (Hornocker and Hash 1981).

Status in Merced River Corridor. Two California wolverine specimens were collected at the head of Lyell Canyon in 1915, just 2 kilometers from the Merced River corridor (Museum of Vertebrate Zoology Database 2011). There have been three unconfirmed sightings within the corridor; along the south fork of the Merced River in 1959, near Pohono Bridge in 1990, and near the junction of Iron Creek and the Merced River in 1959 (Yosemite Wildlife Observation Database 2011). The likelihood of these latter three sightings being legitimate is highly unlikely, however.

Pacific fisher
Martes pennanti pacifica

Status. Federal candidate

General Distribution. Although the historic distribution of Pacific fisher was once contiguous across California and the Pacific Northwest, including the northern Coast range, Klamath Mountains, southern Cascades, and western slope of the Sierra Nevada, the fisher has declined during the past century. Remaining populations are geographically and, in some cases, genetically isolated from one another (Grinnell et al.1937, Zielinski et al. 1995). Pacific fisher currently occur in only two regions of the state, which are separated by over 430 kilometers: the northwest, including the northern Coast Range and

Klamath Province; and the southern Sierra Nevada, including Yosemite National Park (Zielinski et al. 1995). Yosemite lies at the northern tip of the fisher's southern range. The fisher's elevation range is approximately 1,219 meters to 2,134 meters (4,000 feet to 7,000 feet).

Habitat Requirements. The Pacific fisher is one of the most habitat-specific mammals in North America (Buskirk and Powell 1994). Fishers den and bear young in the cavities of large trees or snags and are strongly associated with mid-elevation, mature and late successional coniferous or mixed forests (Powell and Zielinski 1994, Zielinski et al. 2004a, 2004b). In particular, fisher are generally found in stands with high canopy closure, large trees and snags, large wood, large hardwoods, and multiple canopy layers. Fisher generally avoid entering open areas that have no overstory or shrub cover (Buskirk and Powell 1994), while Chow (2009) found that fisher in Yosemite prefer habitat near permanent streams. The fisher has a varied diet consisting primarily of small mammals, such as squirrels, but they also consume porcupines, birds, invertebrates, vegetation, and fruit (Powell and Zielinski 1994).

Status in Merced River Corridor. Fisher are elusive and more challenging to detect compared with other carnivores, but recent fisher surveys (2009–2011) conducted in collaboration with U.C. Berkeley have confirmed the presence of 5– 8 individual fisher south of the Merced River near Chinquapin, Wawona, Mariposa Grove, and along the South Fork Merced River. Previous fisher surveys in the park conducted by Chow (2009) during 1992–1994 detected relatively few fisher despite the availability of suitable habitat and use of a combination of survey methods, including remote cameras and track plates. Chow (2009) concluded that Pacific fisher inhabit Yosemite at very low population densities. The Merced River may be one of multiple barriers currently preventing northward expansion of their range. Two fisher specimens were collected within the Merced River corridor in Yosemite Valley in 1919 and 1920 (Museum of Vertebrate Zoology Database 2011).

Plants

Whitebark pine
Pinus albicaulis

General Ecology and Distribution. Whitebark pine, a tree from the pine family, is native to California. It occurs in subalpine and upper montane forests at elevations ranging between 2,300 and 4,000 meters. It is considered a keystone species and a major food source for many species of birds and mammals. Whitebark pine is rapidly declining throughout most of its range, primarily due to a combination of white pine blister rust, periodic mountain pine beetle outbreaks, fire suppression, and climate change (Natural Resources Defense Council [NRDC], 2008 and Fryer, 2002).

Habitat and Status in the Project Area. This species occurs on cold and windy, high-elevation sites in isolated stands in the subalpine zone. However, it also co-occurs with a diversity of conifers that vary by location and elevation (NRDC, 2008 and Fryer, 2002). In the Project Area, it is found in Segments 1, 2, and 5 (Merced River above Nevada Fall, Yosemite Valley, and South Fork above Wawona, respectively).

CHAPTER V. ENVIRONMENTAL EFFECTS

Methods Used to Assess Effects

Assumptions

The following assumptions were used as a basis in the analysis of effects on special-status species:

- The greater the size of a biotic community and the stronger its links to neighboring communities, the more valuable it is to the integrity and maintenance of biotic processes that sustain special-status species. Development limits the size of a community and fragments and disassociates communities from each other.
- The more developed areas become the less valuable they are as habitat for special-status species. New development would increase human presence and increase the potential for soil, wildlife, and vegetation disturbance. The potential for negative wildlife interactions (such as human injury from wildlife and the introduction of unnatural food sources) also would increase. If development were removed from an area, the value of the habitat for special-status species would increase. In some cases, the dispersal of visitors over a wider area that may follow removal of developed facilities may well have a greater impact than focused visitor use within the well-defined area of development. Human effects can also improve habitat quality for non-native species and unnaturally increase the abundance of some native species, both of which can have an adverse effect on special-status species.
- The presence of humans and the effects of human food on the behavior, distribution, and abundance of wildlife species would continue in existing developments.
- Roads can change water inflow and outflow patterns and may dewater sections of meadow or wetland habitat (USFS 1996). Roads can also cause mortality of wildlife and may form barriers and fragment wildlife habitat.
- Development and effects in riparian zones may influence critical water quality elements such as temperature, suspended sediments, and nutrients. These elements interact in complex ways in aquatic systems and directly and indirectly influence patterns of growth, reproduction, and migration of aquatic organisms.
- Development that has an adverse effect on habitat features that are important to certain special-status species (e.g., particular plant species upon which a species relies, or habitat features that define suitable habitat for a species) can have an acute, negative effect on those species.
- Radiating effects of human use can affect use of habitats adjacent to developed areas by special-status species, even though such habitats are not directly affected by the development.
- Implementation of threatened or endangered species recovery plans and other formal agreements between the U.S. Fish and Wildlife Service and the National Park Service would not be affected by the management direction resulting from the *Merced River Plan/EIS*. The current management direction for special-status species would continue to remain in effect.

Special-Status Plants

The assessment of effects on special-status plants was based on the following:

- The sensitivity of the individual species to effects (based on the rarity, resilience, size of population, and extent of the species throughout the park)
- The location of the species in relation to the Preferred Alternative

Special-Status Wildlife

The assessment of effects on special-status wildlife was based on the following:

- The possibility of a species or its preferred habitat occurring in those areas expected to be affected
- The direct loss of habitat
- The partial loss of habitat from its modification
- The species' sensitivity to disturbance from human activities that may alter use of habitats in areas adjacent to development

Habitat fragmentation was also a critical component of the analysis. Restored blocks of habitat should be large enough to support viable populations, and intact habitat must not be reduced or affected to the point that it will no longer support viable populations.

Impact Analysis

Impacts on special-status species from actions proposed in the *Merced River Plan/EIS* were evaluated in terms of the context, intensity, duration, and type of impact, as defined below. Generally, the methodology for natural resource impact assessment follows direction provided in the *Council of Environmental Quality Regulations for Implementing the National Environmental Policy Act*, Section 1508.27.

- **Context.** The context of the impact considers whether the impact would be local, segmentwide, parkwide, or regional. For the purposes of this analysis, local impacts would be those that occur in a specific area within a segment of the Merced River. This analysis will further identify if there would be local impacts in multiple segments. Segmentwide impacts would consist of a number of local impacts within a single segment or larger-scale impacts that would affect the segment as a whole. Parkwide impacts would extend beyond the river corridor and the study area within Yosemite National Park. Regional impacts would have an influence in a Sierra-wide context. Context suggests that certain impacts depend on the setting of the proposed action. For instance, impacts that would reduce the connectivity between habitat types could be minor if such connections are abundant in a given region, moderate or major if they are not.
- **Intensity.** Impacts can be adverse or beneficial. A negligible impact means that special-status species would not be affected, or effects would not be measurable. A minor impact would be detectable; both short-term and long-term impacts could potentially affect breeding success and habitat availability. Mitigation measures would be sufficient to offset minor adverse effects. A moderate impact would be readily apparent and would result in the reduction or expansion of potential habitat required to meet life requisite needs of one or more species. Mitigation would be required to offset moderate adverse impacts. A major impact would be readily apparent and would result in the direct or indirect gain or loss of occupied breeding sites, take of individuals, or changes to habitat affecting potential for occupancy or reproductive potential. Extensive mitigation would be necessary to offset adverse effects and its success could not be guaranteed. Impacts to rare, threatened, and endangered species would be quantified where possible by determining the acreage of habitat for each species altered. The amount of each habitat type that would be directly affected would be determined by a comparative analysis of suitable habitat spatial data representing existing conditions and conditions under proposed management actions. Effects associated with habitat distribution and patch size will also be addressed quantitatively where baseline data are available to support such an analysis. Other potential direct and indirect effects to rare, threatened, and endangered species habitats, such as effects associated with invasive species or the potential for disturbance to populations due to increases in human activity, will be analyzed qualitatively.
- **Duration.** A short-term impact would have an immediate effect on native habitat, diversity, and native populations but would not cause long-term declines in populations or diversity. Short-term

impacts are normally associated with transitional types of activities, such as facility construction. Long-term impacts would lead to a loss of native habitat, diversity, and species populations as exhibited by a decline in species abundance, viability, and/or survival.

- **Type.** The type of impact considers whether the impact would be beneficial or adverse. Adverse impacts are those that alter the range, location, number, or population of a species or its habitat. Beneficial impacts would improve one or more of these characteristics.

Cumulative Analysis

Cumulative effects on rare, threatened, and endangered species discussed herein are based on analysis of past, present, and reasonably foreseeable actions in the Yosemite region. The intensity of impact depends on whether the impacts are anticipated to interact cumulatively. For example, factors external to the park, such as broad regional habitat loss and pesticide use, can combine with existing, in-park impacts, such as from nonnative species, to cause declines in rare, threatened, or endangered amphibians (such as Sierra Nevada yellow-legged frog and Yosemite toad), which would be an adverse, cumulative impact. The projects identified below are those that have the potential to affect populations of rare, threatened, or endangered species (i.e., within the Merced River corridor) as well as large-scale or regional populations of the same species.

Past Actions

Natural habitats in Yosemite have been manipulated almost since the beginning of the park. Regional wildlife and vegetation patterns have been historically affected by logging, fire suppression, rangeland clearing, grazing, mining, draining, damming, diversions, and the introduction of nonnative species. Mammal species that survive but are extremely rare are the Pacific fisher and Sierra Nevada red fox. Several bird species have probably been reduced in Yosemite Valley by visitor activity but are present in less disturbed areas of the park. Willow flycatchers no longer nest in the Valley—probably due as much to parasitism by brown-headed cowbirds as to destruction of riparian and meadow habitat. Amphibians in Yosemite have suffered population declines similar to those seen in the rest of the Sierra Nevada (Drost and Fellers 1996). Red-legged frogs likely were found in the Valley in the past but are now are presumed extirpated. Significant factors in their disappearance probably include reduction in perennial ponds and wetlands, and predation by bullfrogs. At higher elevations, Sierra Nevada yellow-legged frogs and Yosemite toads are still present in a number of areas but are severely reduced in population and range. Foothill yellow-legged frogs have disappeared completely from the park, if not the entire Sierra Nevada. Research continues to identify the causes of Sierra Nevada-wide amphibian declines; known and possible causes include habitat destruction, nonnative fish, pesticides, and diseases. Past and ongoing activities that affect rare, threatened, or endangered species include construction of dams, diversion walls, bridges, roads, pipelines, riprap, recreational use, buildings, campgrounds, and other recreational features.

In 1991, the USFS and the Bureau of Land Management developed a joint *South Fork and Merced Wild and Scenic River Implementation Plan* for the main stem Merced River and South Fork Merced River that are under their jurisdiction; this plan is also a general management plan with many prescriptive goals and few actions. The plan endeavors to limit or end consumptive uses such as grazing within the river corridor and calls for the formalization of camping and launch facilities for nonmotorized watercraft. Implementation of these actions has a beneficial effect by eliminating impacts where feasible (grazing does not currently occur within the river corridor), concentrating impacts in areas able to withstand visitor use, and providing facilities that mitigate adverse effects associated with visitor use (e.g., restrooms).

Past projects and plans that could have a cumulative effect on special-status species in the Merced River Wild and Scenic corridor include the following:

> ***Management and Restoration –*** *South Fork and Merced Wild and Scenic River Implementation Plan*, Cascades Diversion Dam Removal, Cook's Meadow Ecological Restoration, Fern Springs Restoration, Happy Isles Dam Removal, Happy Isles Fen Habitat Restoration Project, Happy Isles Gauging Station Bridge Removal, Merced River Ecological Restoration at Eagle Creek Project

Present Actions

Current facility-related projects and plans that could have a cumulative effect on special-status species include the following:

> ***Facility Development*** – Crane Flat Utilities, *East Yosemite Valley Utilities Improvement Plan/Environmental Assessment*, Wahhoga Indian Cultural Center, Parkwide Communication Data Network, South Entrance Station Kiosk Replacement, Tioga Road Rehabilitation

Beneficial impacts of present management and restoration actions are similar to those discussed for past actions. Specific examples of present projects and plans with beneficial effects include the following:

> ***Management and Restoration –*** *Yosemite Vegetation Management Plan*, General Ecological Restoration, 2004 *Fire Management Plan/EIS*, Fuels reductions/forest rehabilitation projects (USFS), *Tuolumne Wild and Scenic River Comprehensive Management Plan*

Reasonably Foreseeable Future Actions

Reasonably foreseeable future actions proposed in the region that could have a cumulative effect on regional special-status species include:

- changing demographics of visitors in Yosemite
- climate change
- concessioner parking lot restoration
- Restoration of the Mariposa Grove Ecosystem
- *Yosemite Wilderness Stewardship Plan/EIS*

Federal Endangered Species

Wildlife

Sierra Nevada bighorn sheep (*Ovis canadensis sierrae*)

Direct and Indirect Effects. There would be no direct or indirect effects on the Sierra Nevada bighorn sheep or its preferred habitat. Habitat for the Sierra Nevada bighorn sheep is located in steep terrain in the northeastern portion of Yosemite Park, outside of the Merced River corridor. Additionally, most of the herd inhabits lands outside of the Park. No development would occur within suitable habitat for this species. Therefore, there would be no direct or indirect effects on the Sierra Nevada bighorn sheep.

Cumulative Effects. Regional and parkwide planning efforts such as the Vegetation Management Plan, General Ecological Restoration, Grazing Allotment Permit Renewals (U.S. Forest Service) and 2009 Fire Management Plan could provide benefits to the size, integrity, and connectivity of suitable habitat for the Sierra Nevada bighorn sheep. These regional plans would have a long-term, moderate, beneficial effect on the Sierra Nevada bighorn sheep.

The actions under the Preferred Alternative would have long-term, beneficial effects on special-status species in the Merced River corridor. However, in relation to past, present, and reasonably foreseeable future actions throughout the Sierra Nevada and larger region, (e.g., introduction and spread of nonnative species, direct displacement of habitat) the actions under Alternative 5 would have a minimal beneficial effect. Overall, in conjunction with actions proposed in Alternative 5, cumulative actions on special-status species would result in long-term, adverse effects on Sierra Nevada bighorn sheep.

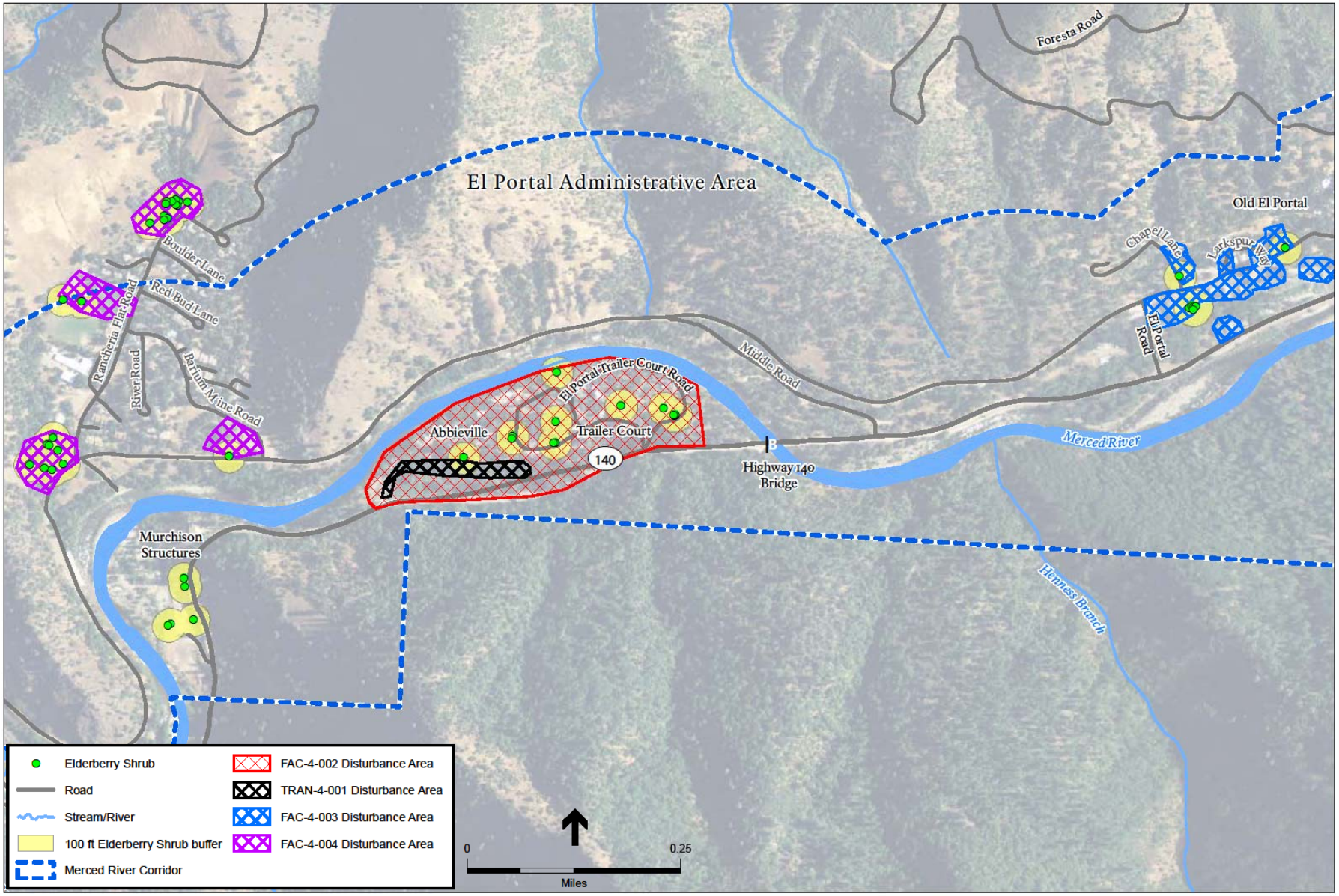
Federal Threatened Species

Valley elderberry longhorn beetle (*Desmocerus californicus dimorphus*)

Direct and Indirect Effects. Potential Valley elderberry longhorn beetle habitat is defined by the presence or absence of elderberry plants in areas below 3,000 feet in elevation. Potential habitat for this species occurs in Segments 3 and 4 (Merced Gorge and El Portal, respectively), generally in riparian areas; however, activities that have the potential to affect Valley elderberry longhorn beetle would only occur in Segment 4 (El Portal, see Figure N-1).

Approximately 124 elderberry plants (*Sambucus nigra* ssp. *cerulea*) of a size sufficient to support the Valley elderberry longhorn beetle occur in areas of potential development or management activities in El Portal. Valley elderberry longhorn beetle exit holes that verify beetle activity were found in 11 of these elderberry plants, though beetle larvae could still be present in elderberry plants without exit holes (Acree, 2012). Actions in Segment 4, including moving temporary housing units to El Portal and development at the Abbieville and Trailer Village, would result in potential indirect or direct impacts on elderberry shrubs, including removal of shrubs. Approximately 37 elderberry plants were documented within potential areas of ground disturbance, seven with exit holes (Acree, 2012). Complete impact avoidance would not be possible for these plants as ground disturbance would be intensive in these areas under the final preferred alternative. The infill in El Portal would affect up to nine elderberry shrubs with stems greater than one inch in diameter. The development at Abbieville would affect up to 16 shrubs, while the development at Trailer Village would affect up to 12 shrubs as proposed in the *Merced River Plan/EIS*. However, planning and implementation would strive to minimize effects to riparian vegetation and shrubs that are retained in the area. For example, new employee housing would be constructed outside of the 100-year floodplain to avoid impacts to riparian vegetation. Nevertheless, shrubs retained adjacent to proposed developed areas could be subject to future damage from human activities, such as unauthorized pruning and vehicles.

Direct or indirect impacts on valley elderberry longhorn beetle habitat would result in adverse effects to this species. To minimize and avoid potential effects where possible, NPS will implement avoidance and mitigation measures outlined in the 1999 USFWS *Conservation Guidelines for the Valley Elderberry Longhorn Beetle* (Conservation Guidelines) (mitigation measure MM-WL-4, as applicable; see Appendix C). The Conservation Guidelines prescribe conservation measures to avoid and minimize adverse effects on the valley elderberry



SOURCE: NPS, 2011, 2012; NAIP, 2012

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Figure N-1

Segment 4 – Elderberry Shrubs

longhorn beetle, including specific procedures for transplanting, requirements to plant additional seedlings or cuttings and associated native species, protective measures, maintenance, and reporting.

Using the measures outlined in the Conservation Guidelines, the NPS estimates that 37 elderberry plants would need transplanting, 174 additional seedlings or cuttings would need to be planted, along with 101 associated native plants. In addition, a 1.53 acre Habitat Conservation Area would be required to protect transplants and establish required associated native plants (Acree, 2012). The NPS proposes to establish a 1.53 acre Habitat Conservation Area at the Greenemeyer Sand Pit, pending confirmation from the USFWS (see Appendix C for details).

Ecological restoration actions occurring in El Portal include riparian revegetation and removal of abandoned utilities and facilities. Additionally, no new development would occur within 150 feet of the river. These actions combined would result in long-term beneficial effects to the Valley elderberry longhorn beetle, as this species' primary habitat occurs within riparian habitat.

Cumulative Effects. Foreseeable projects that could have adverse effects on the Valley elderberry longhorn beetle and its habitat include the Utilities Master Plan/East Yosemite Valley Utilities Improvement Plan and Parkwide Communication Data Network. These projects would have the potential to damage or destroy elderberry plants and directly affect local Valley elderberry longhorn beetle populations.

Long-term, beneficial effects would be expected from the Vegetation Management Plan, General Ecological Restoration, Grazing Allotment Permit Renewals (U.S. Forest Service), 2009 Fire Management Plan, Invasive Plant Management Plan Update, Fuels reductions/forest rehabilitation projects (U.S. Forest Service) because these planning efforts could lead to greater protection of elderberry plants.

The actions under the Preferred Alternative would have long-term, beneficial effects on special-status species in the Merced River corridor. However, in relation to past, present, and reasonably foreseeable future actions throughout the Sierra Nevada and larger region, (e.g., introduction and spread of nonnative species, direct displacement of habitat) the actions under Alternative 5 would have a minimal beneficial effect. Overall, in conjunction with actions proposed in Alternative 5, cumulative actions on special-status species would result in long-term, adverse effects on valley elderberry longhorn beetle.

Federal Candidate Species

Wildlife

Yosemite toad (*Anaxyrus canorus*)

Direct and Indirect Effects. The areas of likely occurrence of Yosemite toads in the study area, based upon previous observations and collections, are in high-elevation meadows and lakes in Segment 1 (Merced River above Nevada Fall) and Segment 5 (South Fork Merced River above Wawona). The Yosemite toad is regarded as a high-elevation species. There is a single historic record of this species in Yosemite Valley that places it approximately 2,500 feet below its usual range. It is unlikely that this record reflects the sustainable range of Yosemite toads. The proposed actions within Segments 1 and 5 are primarily ecological restoration actions, and thus would result in direct and indirect negligible effects to the Yosemite toad. Meadow restoration, cessation of pack stock grazing, and re-routing trails outside of sensitive meadow habitat would

result in long-term, beneficial effect to the Yosemite toad. Meadow restoration at the Merced Lake High Sierra Camp area would also have long-term beneficial impacts on Yosemite toads.

Overall, effect of the Preferred Alternative on Yosemite toads is expected to be long-term, local and beneficial.

Cumulative Effects. Projects that have an appreciable effect on high-elevation meadow habitats are most likely to affect the Yosemite toad. Regional and parkwide planning efforts such as the Vegetation Management Plan, General Ecological Restoration, Grazing Allotment Permit Renewals (U.S. Forest Service), 2009 Fire Management Plan, Invasive Plant Management Plan Update, Fuels reductions/forest rehabilitation projects (U.S. Forest Service), High Elevation Aquatic Resources Management Plan, Tuolumne Wild and Scenic River Comprehensive Management Plan, and Tuolumne Meadows Concept Plan could improve the size, integrity, and connectivity of suitable habitat for the Yosemite toad. These actions could have long-term, moderate to major, beneficial effects on suitable habitat, depending upon the extent of their implementation over time.

Projects that could have a potentially adverse effect on the Yosemite toad include the Parkwide Communication Data Network, Tioga Road Rehabilitation, and Tuolumne Meadows Water Treatment System Improvements.

The actions under the Preferred Alternative would have long-term, beneficial effects on special-status species in the Merced River corridor. However, in relation to past, present, and reasonably foreseeable future actions throughout the Sierra Nevada and larger region, (e.g., introduction and spread of nonnative species, direct displacement of habitat) the actions under Alternative 5 would have a minimal beneficial effect. Overall, in conjunction with actions proposed in Alternative 5, cumulative actions on special-status species would result in long-term, adverse effects on Yosemite toad.

Sierra Nevada yellow-legged frog (*Rana sierrae*)

Suitable habitat for this species occurs in Segments 1 (Merced River above Nevada Fall) and 5 (South Fork Merced River above Wawona) in high elevation lakes, ponds, and streams near the South Fork above Wawona. The proposed actions within these segments are primarily ecological restoration actions, and thus would result in direct and indirect negligible effects to the Sierra Nevada yellow-legged frog. Meadow restoration, cessation of pack stock grazing, and re-routing trails outside of sensitive meadow habitat would result in beneficial effect to the Sierra Nevada yellow-legged frog as these habitats often form direct connections to other aquatic habitats (e.g., lakes and streams). Meadow restoration at the Merced Lake High Sierra Camp area would result in beneficial effect to Sierra Nevada yellow-legged frog.

Overall, effect of the Preferred Alternative on Sierra Nevada yellow-legged frog is expected to be long-term, local and beneficial.

Cumulative Effects. Projects that have an appreciable effect on high-elevation aquatic habitats are most likely to affect the Sierra Nevada yellow-legged frog. Regional and park-wide planning efforts such as the Vegetation Management Plan, General Ecological Restoration, Grazing Allotment Permit Renewals (U.S. Forest Service), 2009 Fire Management Plan, Invasive Plant Management Plan Update, Fuels reductions/forest rehabilitation projects (U.S. Forest Service), High Elevation Aquatic Resources Management Plan, Tuolumne Wild and Scenic River Comprehensive Management Plan, and Tuolumne Meadows Concept Plan could improve water quality and habitat for the Sierra Nevada yellow-legged frog.

These actions could have long-term, moderate to major, beneficial effects on suitable habitat, depending upon the extent of their implementation over time.

Projects that could have a potentially adverse effect on the Sierra Nevada yellow-legged frog include the Parkwide Communication Data Network, Tioga Road Rehabilitation, and Tuolumne Meadows Water Treatment System Improvements.

The actions under the Preferred Alternative would have long-term, beneficial effects on special-status species in the Merced River corridor. However, in relation to past, present, and reasonably foreseeable future actions throughout the Sierra Nevada and larger region, (e.g., introduction and spread of nonnative species, direct displacement of habitat) the actions under Alternative 5 would have a minimal beneficial effect. Overall, in conjunction with actions proposed in Alternative 5, cumulative actions on special-status species would result in long-term, adverse effects on Sierra Nevada yellow legged frog.

California wolverine (*Gulo gulo luteus*)

Direct and Indirect Effects. Wolverines typically inhabit semi-open terrain at or above the timberline from spring through fall, and then move to lower-elevation forests in winter. They have been seen in a variety of habitats, including treeless barrens, alpine meadows, and mixed coniferous forests (Thelander et al. 1994). The most important habitat characteristic appears to be a low level of human disturbance (Thelander et al. 1994).

The Merced River corridor supports wolverine habitat in Segments 1 and 5 (Merced River above Nevada Fall and South Fork Merced River above Wawona, respectively). Proposed actions within these two segments primarily involve ecological restoration of meadow habitat. Additionally, given existing low level of development and apparent scarcity of wolverines in the Sierra Nevada, ecological restoration activities at these two segments would be expected to result in negligible effects to the species during restoration activities. Overall, impacts on wolverines under the Preferred Alternative would be beneficial following habitat restoration.

Cumulative Effects. Regional and parkwide planning efforts such as the Vegetation Management Plan, General Ecological Restoration, Grazing Allotment Permit Renewals (U.S. Forest Service) and 2009 Fire Management Plan could provide benefits to the size, integrity, and connectivity of suitable habitat for the California wolverine. These regional plans would have a long-term, moderate, beneficial effect on suitable habitat, depending upon the extent of their implementation over time.

Given the high-elevation occurrence of wolverines and their aversion to human contact, no foreseeable projects would have an effect on this species.

The actions under the Preferred Alternative would have long-term, beneficial effects on special-status species in the Merced River corridor. However, in relation to past, present, and reasonably foreseeable future actions throughout the Sierra Nevada and larger region, (e.g., introduction and spread of nonnative species, direct displacement of habitat) the actions under Alternative 5 would have a minimal beneficial effect. Overall, in conjunction with actions proposed in Alternative 5, cumulative actions on special-status species would result in long-term, adverse effects on California wolverine.

Pacific fisher (*Martes pennanti*)

Direct and Indirect Effects. Fisher habitat in the Merced River Corridor is primarily conifer and mixed conifer forests in Segments 1, 2, 5, and 7 (Merced River above Nevada Fall, Yosemite Valley, South Fork Merced River above Wawona, and Wawona, respectively). Although some suitable habitat for Pacific fisher occurs in Segment 2, this species is highly sensitive to human presence and would not likely utilize habitats in Yosemite Valley. Proposed actions in Segments 1 and 5 are primarily ecological restoration actions, and thus would have a negligible effect on Pacific fishers during implementation and beneficial effect following restoration. Proposed actions in Wawona include removing select campsites and retaining current facilities and services, which would continue to affect wildlife in general. However, there are no proposed actions which would remove suitable fisher habitat (large trees and snags within coniferous or mixed forests).

Proposed actions to manage visitor use and facilities in Segment 2 would occur at Curry Village, Yosemite Village, Housekeeping Camp, Yosemite Lodge, and Camp 4. Potential foraging habitat for Pacific fisher may be affected by proposed construction and reorganization activities in the near-term in these areas, including direct loss of ponderosa pine habitat. Near-term actions in Segments 1 at the Merced Lake High Sierra Camp would retain the camp, reduce capacity of beds, and replace flush toilets with composting toilets. The camp's 60 beds would be reduced to 42 (retaining 11 of the 22 historic canvas tents). The historic foundations of the 11 tents to be removed would be retained. Ecological restoration activities in this segment would be expected to result in negligible effects to the species during restoration activities. Overall, impacts on Pacific fisher under the Preferred Alternative in Segment 1 would be beneficial following habitat restoration.

In Segment 7, near-term actions would remove campsites that are within the 100-year floodplain or in culturally sensitive areas at the Wawona Campground area. All of these actions would occur near currently developed areas that receive relatively high levels of human disturbance. Because, this species is sensitive to human presence, it is therefore not likely to occur in potentially affected areas Thus, these actions would not likely result in any direct or indirect effects to the Pacific fisher.

Cumulative Effects. Regional and parkwide planning efforts such as the Vegetation Management Plan, General Ecological Restoration, Grazing Allotment Permit Renewals (U.S. Forest Service), 2009 Fire Management Plan, Invasive Plant Management Plan Update, Fuels reductions/forest rehabilitation projects (U.S. Forest Service) could provide benefits to the fisher.

The Utilities Master Plan/East Yosemite Valley Utilities Improvement Plan and Parkwide Communication Data Network, projects may have an adverse effect on fisher habitat.

The actions under the Preferred Alternative would have long-term, beneficial effects on special-status species in the Merced River corridor. However, in relation to past, present, and reasonably foreseeable future actions throughout the Sierra Nevada and larger region, (e.g., introduction and spread of nonnative species, direct displacement of habitat) the actions under Alternative 5 would have a minimal beneficial effect. Overall, in conjunction with actions proposed in Alternative 5, cumulative actions on special-status species would result in long-term, adverse effects on Pacific fisher.

Whitebark pine (*Pinus albicaulis*)

Direct and Indirect Effects. Whitebark pine is generally found in high-elevation upper montane and subalpine forests in Segments 1 (Merced River above Nevada Fall) and 5 (South Fork Merced River above Wawona). The proposed actions in Segments 1 and 5 are primarily ecological restoration actions in

meadows and wetlands that generally do not require the removal of conifers, and thus would result in no adverse effects to the whitebark pine. Meadow and wetland restoration, cessation of pack stock grazing, and re-routing trails outside of sensitive meadow and wetland habitat in Segments 1 and 5 would result in no beneficial or adverse effects to the whitebark pine as these activities generally occur outside of whitebark pine habitat (forests).

Overall, no adverse or beneficial effect on whitebark pine is expected as a result of the implementation of the Preferred Alternative.

Actions at the Merced Lake High Sierra Camp in Segment 1 would retain the camp, reduce capacity of beds, and replace flush toilets with composting toilets. The camp's 60 beds would be reduced to 42 (retaining 11 of the 22 historic canvas tents). The historic foundations of the 11 tents to be removed would be retained. It is unlikely that proposed actions in Segment 1 would affect whitebark pine because the actions would occur outside the elevation range for whitebark pine.

Cumulative Effects. Whitebark pine is rapidly declining throughout most of its range, and recent monitoring and research results suggest that whitebark pine mortality may be increasing in California due to mountain pine beetle outbreaks (Gibson et al. 2008). Other factors that contribute to whitebark pine decline include white pine blister rust from a fungal pathogen, fire suppression, and climate change (by predisposing trees to insect and pathogen attacks and enabling white pine blister rust to expand to higher elevations) (Millar et al. 2012)

Projects that have an appreciable effect on high-elevation forest habitats are most likely to affect the whitebark pine. Regional and parkwide planning efforts such as the Vegetation Management Plan, General Ecological Restoration, 2009 Fire Management Plan, Invasive Plant Management Plan Update, Fuels reductions/forest rehabilitation projects (U.S. Forest Service), and Tuolumne Wild and Scenic River Comprehensive Management Plan could improve habitat conditions for whitebark pine. Particularly, fire management designed to remove late-successional trees and favor whitebark pine may reduce competition from other conifer species for suitable openings for seed germination. These actions could have long-term, beneficial effects on whitebark pine, depending upon the extent of their implementation over time.

Projects that could have a potentially adverse effect on the whitebark pine include the Parkwide Communication Data Network and Tioga Road Rehabilitation.

The actions under the Preferred Alternative would have long-term, beneficial effects on special-status species in the Merced River corridor. However, in relation to past, present, and reasonably foreseeable future actions throughout the Sierra Nevada and larger region, (e.g., introduction and spread of nonnative species, direct displacement of habitat) the actions under Alternative 5 would have a minimal beneficial effect. Overall, in conjunction with actions proposed in Alternative 5, cumulative actions on special-status species would result in long-term, adverse effects on whitebark pine.

CHAPTER VI. DETERMINATION OF EFFECTS ON FEDERALLY LISTED OR CANDIDATE SPECIES

The impact on listed or candidate species are analyzed in accordance with USFWS guidelines. Federal agencies must consult with the Fish and Wildlife Service to ensure their actions would not jeopardize the continued existence of any federally listed or proposed threatened or endangered species, or adversely modify designated or proposed critical habitat (Endangered Species Act, section 7(a)(2)). If listed species or their critical habitat are present, the federal agency must determine if the action would have "no effect," "may effect, not likely to adversely affect," or "may effect, likely to adversely affect" those species or their habitat. The National Park Service makes the determination of effect for the alternatives following guidance outlined in the *Endangered Species Act Consultation Handbook: Procedures for Conducting Section 7 Consultations and Conference Activities* (USFWS and NMFS 1998). The following guidance is used to determine impacts whether the species is protected under the Endangered Species Act, or identified as sensitive by the park, another federal agency (e.g., BLM or USFS) or a local agency.

This determination of effects is based solely on the Preferred Alternative in the *Draft Merced River Plan* as described in Chapter III of this document, and does not assume any potential mitigation measures. Mitigation measures are recommended in Chapter VII. The following criteria were used to develop determinations:

- ***No Effect*** – The project (or action) is located outside suitable habitat **and** there would be no disturbance or other direct or indirect impacts on the species. The action would not affect the listed species or its designated critical habitat.
- ***May Affect, Not Likely to Adversely Affect*** – The project (or action) occurs in suitable habitat or results in indirect impacts on the species, but the effect on the species is likely to be beneficial, discountable, or insignificant. The action may pose effects on listed species or designated critical habitat but given circumstances or mitigation conditions, the effects may be discounted, insignificant, or completely beneficial.
    a. ***Beneficial effects*** – contemporaneous positive effects without any adverse effects.
    b. ***Insignificant effects*** – relate to the size of the impact and should never reach the scale where take would occur.
    c. ***Discountable effects*** – those that are extremely unlikely to occur. Based on best judgment, a person would not (1) be able to meaningfully measure, detect, or evaluate insignificant effects or (2) expect discountable effects to occur.
- ***May Affect, Likely to Adversely Affect*** – The project (or action) would have an adverse effect on a listed species as a result of direct, indirect, interrelated, or interdependent actions, and the effect is not discountable, insignificant, or beneficial.

Determinations for Federally Listed Threatened or Endangered Species

Sierra Nevada bighorn sheep (*Ovis canadensis sierrae*)

It is the determination of the National Park Service that actions that are proposed in the *Merced River Plan/EIS* will have no effect on the Sierra Nevada bighorn sheep. The following conclusions have led to this determination:

- There would be no direct or indirect effects on the Sierra Nevada bighorn sheep or its preferred habitat.

Valley elderberry longhorn beetle (*Desmocerus californicus dimorphus*)

It is the determination of the National Park Service that the actions proposed in the *Merced River Plan/EIS* may affect, and are likely to adversely affect, the Valley elderberry longhorn beetle. The following conclusions have led to this determination:

- Elderberry plants grow within the project area. Based on the foregoing analysis, there is a likelihood that "take," as defined in the Endangered Species Act, may occur.

Elderberry plants, the sole foodplant and habitat for the Valley elderberry longhorn beetle, are abundant in the Merced River canyon in the elevation range of the beetle, especially in the El Portal area. Elderberry plants would be avoided during construction wherever practicable.

Determinations for Federal Candidate Species

Whitebark pine (*Pinus albicaulis*)

It is the determination of the National Park Service that actions that are proposed in the *Merced River Plan/EIS* will have no effect on the whitebark pine. The following conclusions have led to this determination:

- There would be no direct or indirect effects on the whitebark pine or its habitat.

Yosemite toad (*Anaxyrus canorus*)

It is the determination of the National Park Service that actions that are proposed in the *Merced River Plan/EIS* may affect, but are not likely to adversely affect, the Yosemite toad. The following conclusions have led to this determination:

- Yosemite toads utilize higher elevation wet meadows, small ponds, and flooded shallow grassy areas in Segments 1 and 5.
- Actions proposed in Segments 1 and 5 are generally habitat restoration projects that would ultimately benefit Yosemite toad.

Sierra Nevada yellow-legged frog (*Rana Sierrae*)

It is the determination of the National Park Service that actions that are proposed in the *Merced River Plan/EIS* may affect, but are not likely to adversely affect, the Sierra Nevada yellow-legged frog. The following conclusions have led to this determination:

- Sierra Nevada yellow-legged frogs utilize aquatic habitats in Segments 1 and 5.
- Actions proposed in Segments 1 and 5 are generally habitat restoration projects that would ultimately benefit Sierra Nevada yellow-legged frog.

California wolverine (*Gulo gulo*)

It is the determination of the National Park Service that actions that are proposed in the *Merced River Plan/EIS* may affect, but are not likely to adversely affect, the California wolverine. The following conclusions have led to this determination:

- California wolverines have not been verified in Yosemite National Park since 1915; unconfirmed sightings have been reported in 1959 and 1990. However, California wolverine could utilize a variety of habitats in Segments 1 and 5, including wet meadows.
- Actions proposed in Segments 1 and 5 are generally habitat restoration projects that would ultimately benefit California wolverine.

Pacific fisher (*Martes pennant pacifica*)

It is the determination of the National Park Service that actions that are proposed in the *Merced River Plan/EIS* may affect, but are not likely to adversely affect, the Pacific fisher. The following conclusions have led to this determination:

- Pacific fisher may utilize coniferous forests in Segments 1, 2, 5, and 7.
- Actions proposed in Segments 1 and 5 are generally habitat restoration projects that would ultimately benefit Pacific fisher.
- Although suitable foraging habitat for this species would be impacted by proposed actions in Segments 2 and 7, this species is sensitive to human presence and is not likely to utilize habitats in these areas.

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APPENDIX O

WETLAND STATEMENT OF FINDINGS

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APPENDIX O

WETLAND STATEMENT OF FINDINGS FOR THE MERCED WILD AND SCENIC RIVER FINAL COMPREHENSIVE MANAGEMENT PLAN AND ENVIRONMENTAL IMPACT STATEMENT

This Wetlands Statement of Findings (WSOF) characterizes the wetland resources that occur within the project area for the Merced Wild and Scenic River Final Comprehensive Management Plan (Merced River Plan), describes the impacts the project will likely have on wetland resources, and documents the steps the National Park Service (NPS) will take to avoid, minimize, and offset these impacts. This Wetland Statement of Findings is included in this document for public review to meet the obligations of Executive Order 11990 (Protection of Wetlands), Director's Order 77-1: Wetland Protection, and National Park Service Procedural Manual 77-1: Wetland Protection (2008).

PURPOSE OF THIS STATEMENT OF FINDINGS

Under Directors Order #77-1 for Wetland Protection, Part 2.5 states:

> Actions proposed by the NPS that have the potential to have adverse impacts on wetlands will be addressed in an Environmental Assessment (EA) or an Environmental Impact Statement (EIS). If the preferred alternative in an EA or EIS will result in adverse impacts on wetlands, a "Statement of Findings" documenting compliance with this Director's Order (D.O.) and Procedural Manual #77-1 will be completed. Actions that may be excepted from the Statement of Findings requirement are identified in the Procedural Manual.

In #77-1, Section 5.3.4 (3) states:

> "...A draft EIS that identifies a preferred alternative that will have adverse impacts on wetlands must be accompanied by a separately identifiable draft WSOF that explains why an alternative with such impacts was chosen and that meets the other requirements identified in Section 5.3.5 of these procedures."

The purpose of this Wetland Statement of Findings is to review the Merced River Plan in sufficient detail to:

- Avoid, to the extent possible, the short-and long-term adverse impacts associated with the destruction or modification of wetlands and to avoid direct or indirect support of new construction in wetlands wherever there is a practicable alternative
- Describe the effects on wetland values associated with the final preferred alternative
- Provide a thorough description and evaluation of mitigation measures developed to achieve compliance with Executive Order 11990 (Protection of Wetlands) and National Park Service Procedural Manual 77-1: Wetland Protection
- Ensure "no net loss" of wetland functions or values

CHARACTERISTICS OF EXISTING WETLANDS

Wetland Extent

There are wetlands and/or riparian habitats in every segment of the Merced River corridor (Figure O-1 through Figure O-8). Approximately 1,600 acres of wetland and/or riparian habitat occur within the Merced River corridor. Table O-1 provides a summary of the classes and areal extent of wetland and riparian habitats by corridor segment. Wetland data were obtained from site-specific wetland delineations, if available. National Wetland Inventory data (USFWS 1995), supplemented with data from the Yosemite Parkwide Vegetation Map (1997), were used to describe wetlands in the Merced River corridor in areas where delineation data were not available (site-specific wetland delineation data was only available for limited areas in Yosemite Valley). Data on riparian habitats was taken from the *Merced River and Riparian Vegetation Assessment* (Cardno ENTRIX 2011) for the river corridor through Yosemite Valley. Data from the Yosemite Parkwide Vegetation Map (1997) were used to describe riparian habitats outside of Yosemite Valley. This provides a conservative estimate of wetlands in the project area.

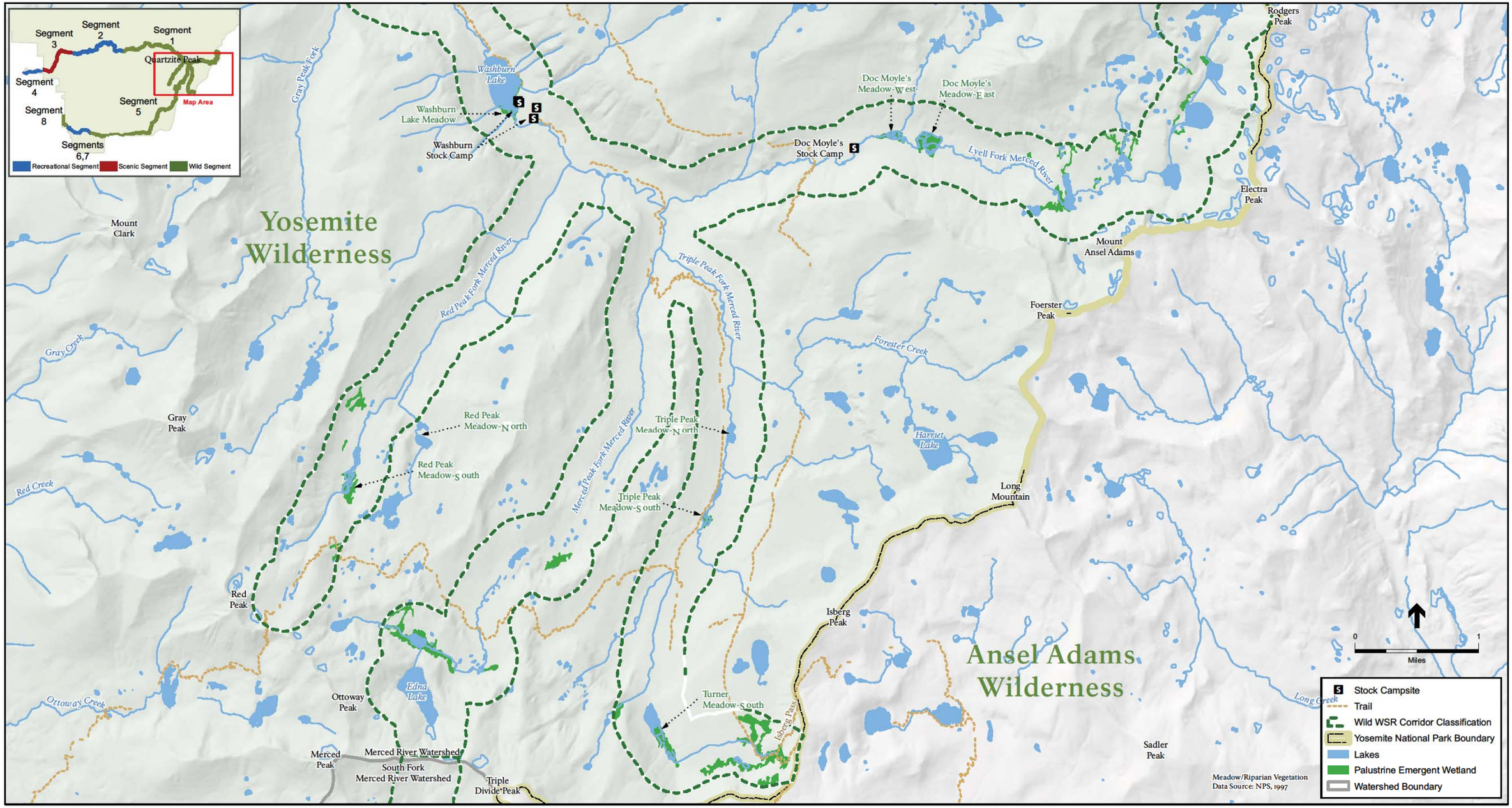
TABLE O-1: CLASSES AND AREAL EXTENT OF WETLAND HABITATS IN THE MERCED RIVER CORRIDOR

Wetland Class	Area per Segment (acres)							
Cowardin Class	**1**	**2**	**3**	**4**	**5**	**6**	**7**	**8**
Riverine/Lacustrine	404.5	141.0	96.2	42.3	89.5	0.4	64.0	27.7
Palustrine Emergent Wetland (wet meadows)	216.5	261.2	0	1.7	69.8	0	0	0
Palustrine Forested Wetland	0	116.7	11.8	5.2	0.9	0	0	0
Palustrine Scrub Shrub Wetland	10.0	13.7	12.0	4.6	3.3	0	2.5	0
SOURCE: USFWS 1995; NPS 1997; NPS 2011								

The NPS classifies and maps wetland habitats using a system developed by wetland ecologists and an interagency team for the U.S. Fish and Wildlife Service (USFWS), which is often referred to as the Cowardin classification system (Cowardin et al. 1979). Wetlands, as defined by the USFWS, are transitional lands between terrestrial and aquatic systems where the water table is usually at or near the surface, or the land is covered by shallow water (Cowardin et al. 1979). For purposes of this classification, wetlands must have one or more of the following attributes:

- The land predominantly supports hydrophytes, at least periodically. Hydrophytes are plants that grow in water or on a substrate that is at least periodically deficient in oxygen as a result of excessive water content.
- The substrate is predominantly undrained hydric soils. Hydric soils are wet long enough to periodically produce anaerobic conditions.
- The substrate is saturated with water or covered by shallow water at some time during the growing season of each year (Cowardin et al. 1979).

The U.S. Army Corps of Engineers (Corps) uses three wetland parameters to define wetlands for regulatory purposes: hydrophytic vegetation, hydric soil, and wetland hydrology. When all three parameters are present, the wetland is considered a jurisdictional wetland. The Cowardin system defines more habitat types as wetlands than does the Corps definition as it recognizes many unvegetated sites (e.g., mudflats, stream

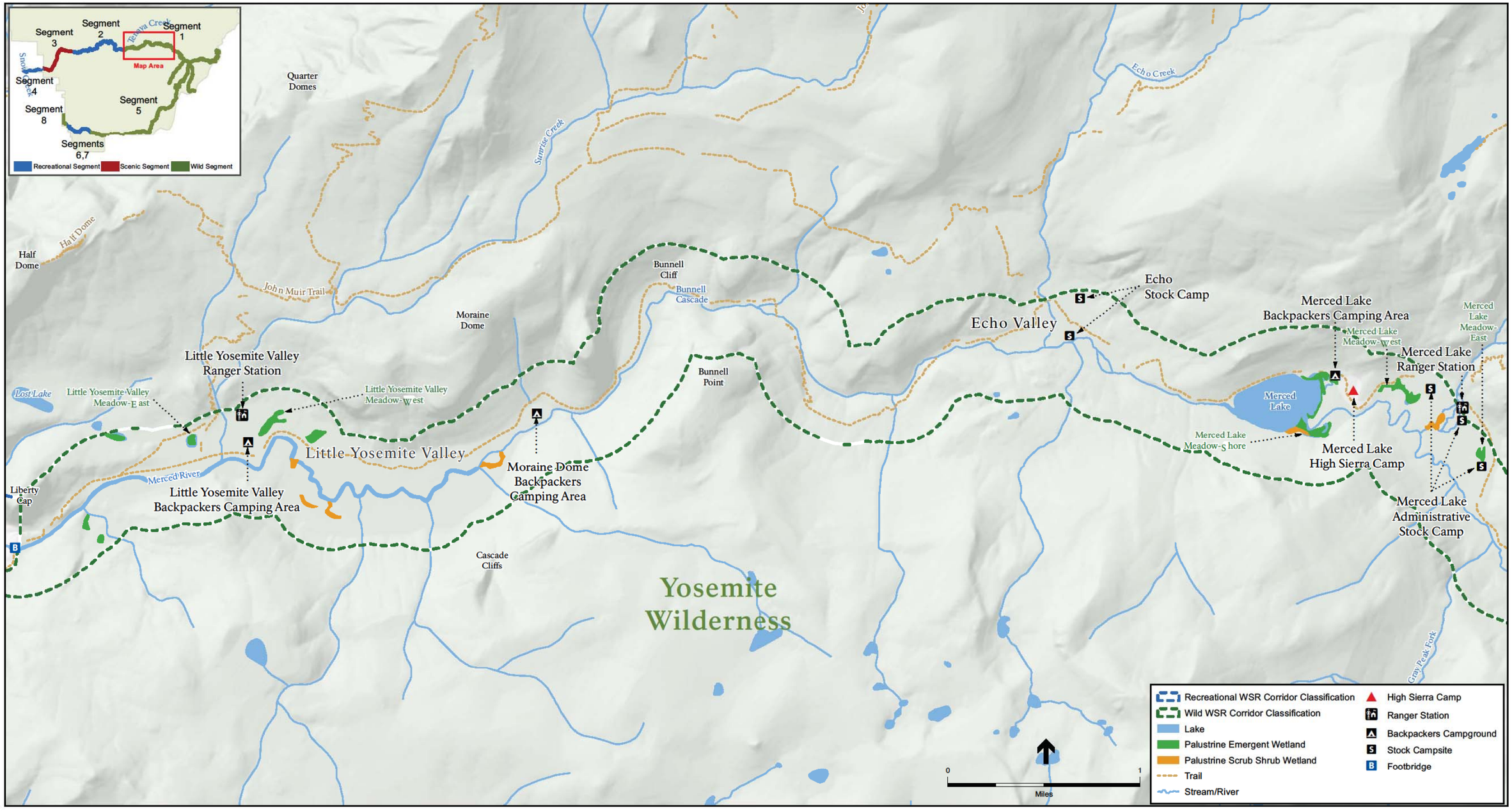


SOURCE: NPS, 1997, 2011

Merced Wild and Scenic River Final Comprehensive Management Plan/EIS . 210436

Figure O-1

Segment 1 - Merced River Above Nevada Fall Wetlands



SOURCE: NPS, 1997, 2011

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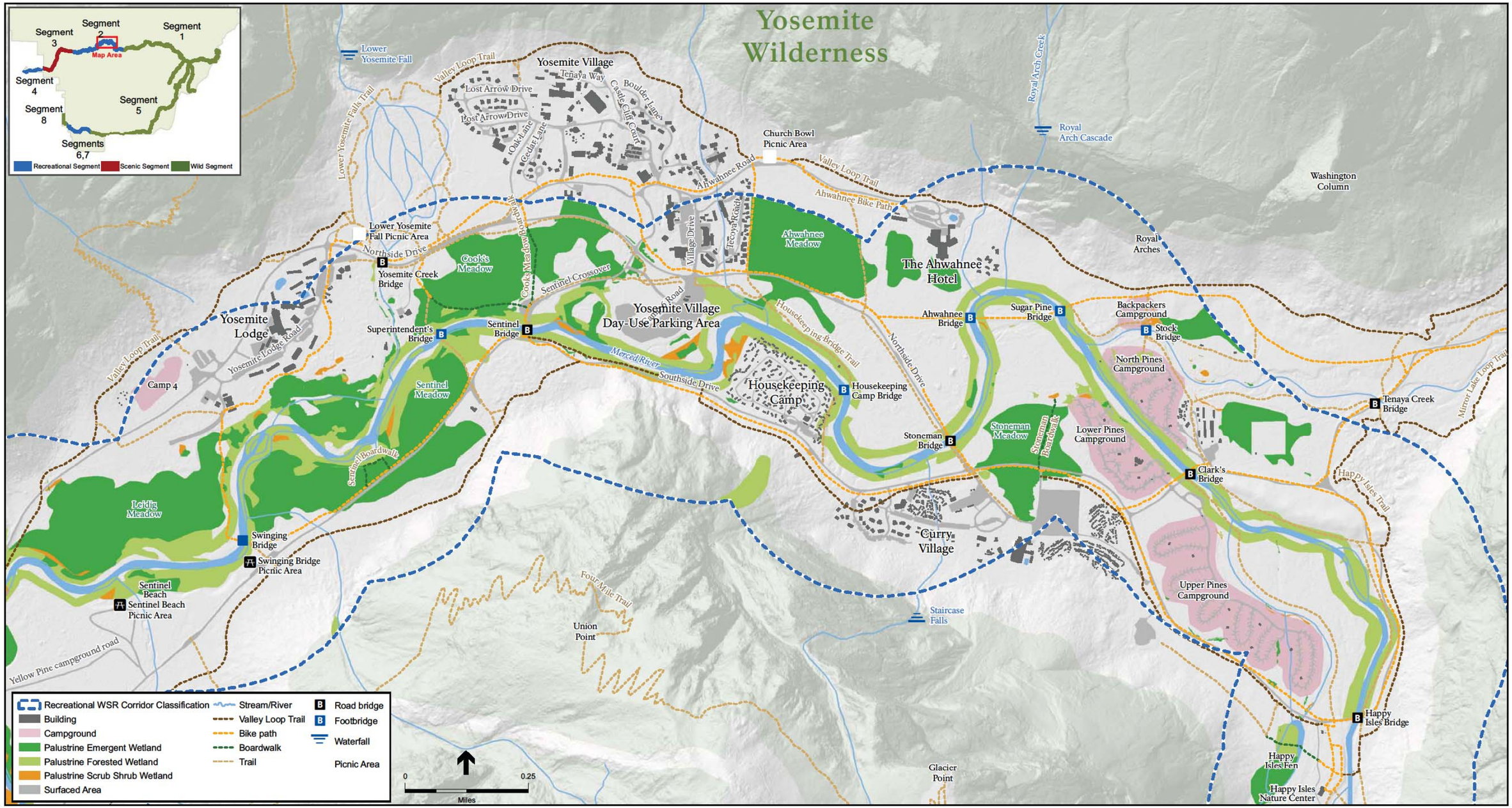
Figure O-2

Segment 1 - Little Yosemite Valley and Merced Lake High Sierra Camp Wetlands



SOURCE: NPS, 1997, 2006, 2010, 2011

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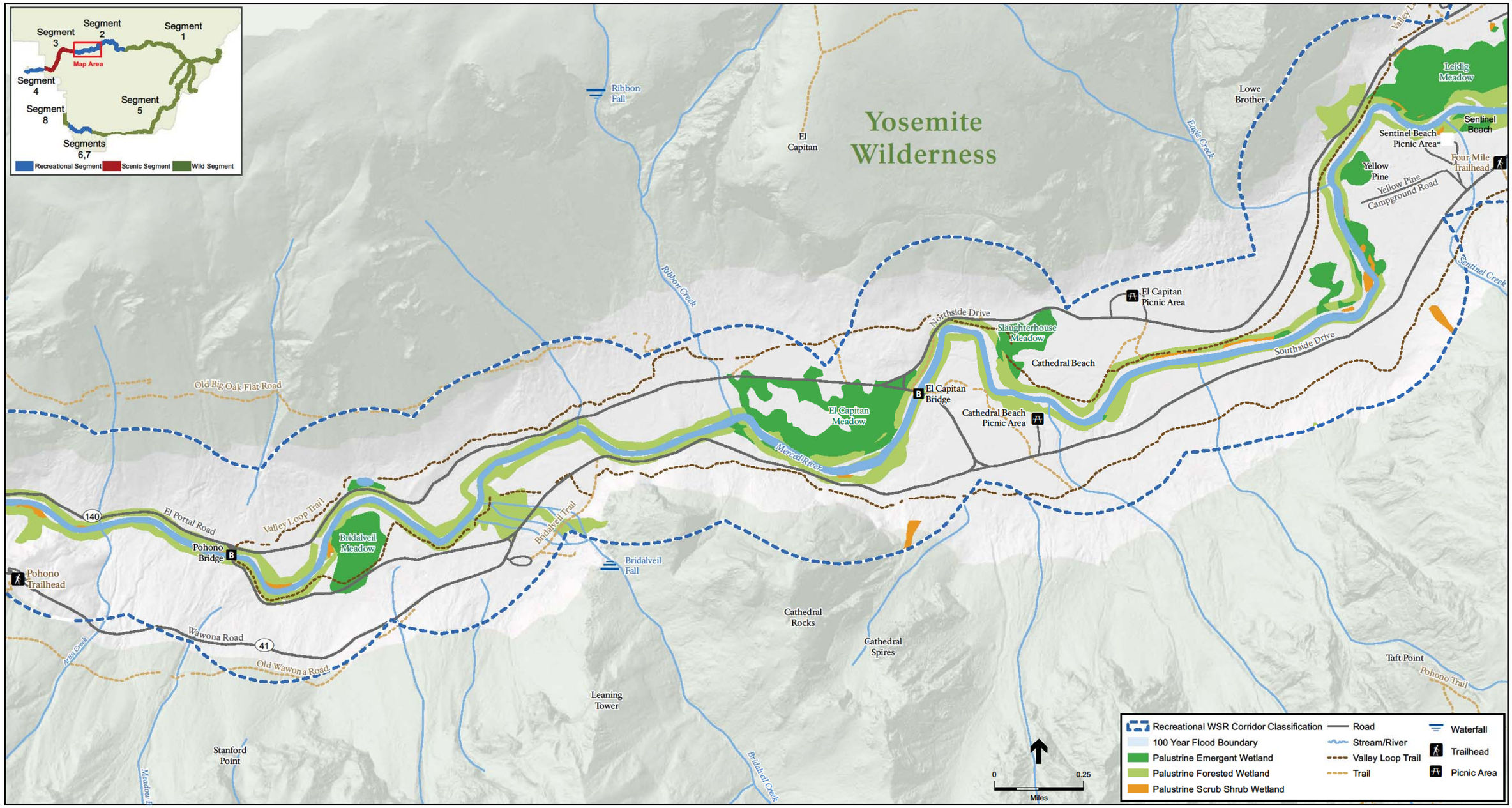
Figure O-3

Segment 2 - Yosemite Lodge, Yosemite Village, and The Ahwahnee Wetlands



SOURCE: NPS, 1997, 2010, 2011

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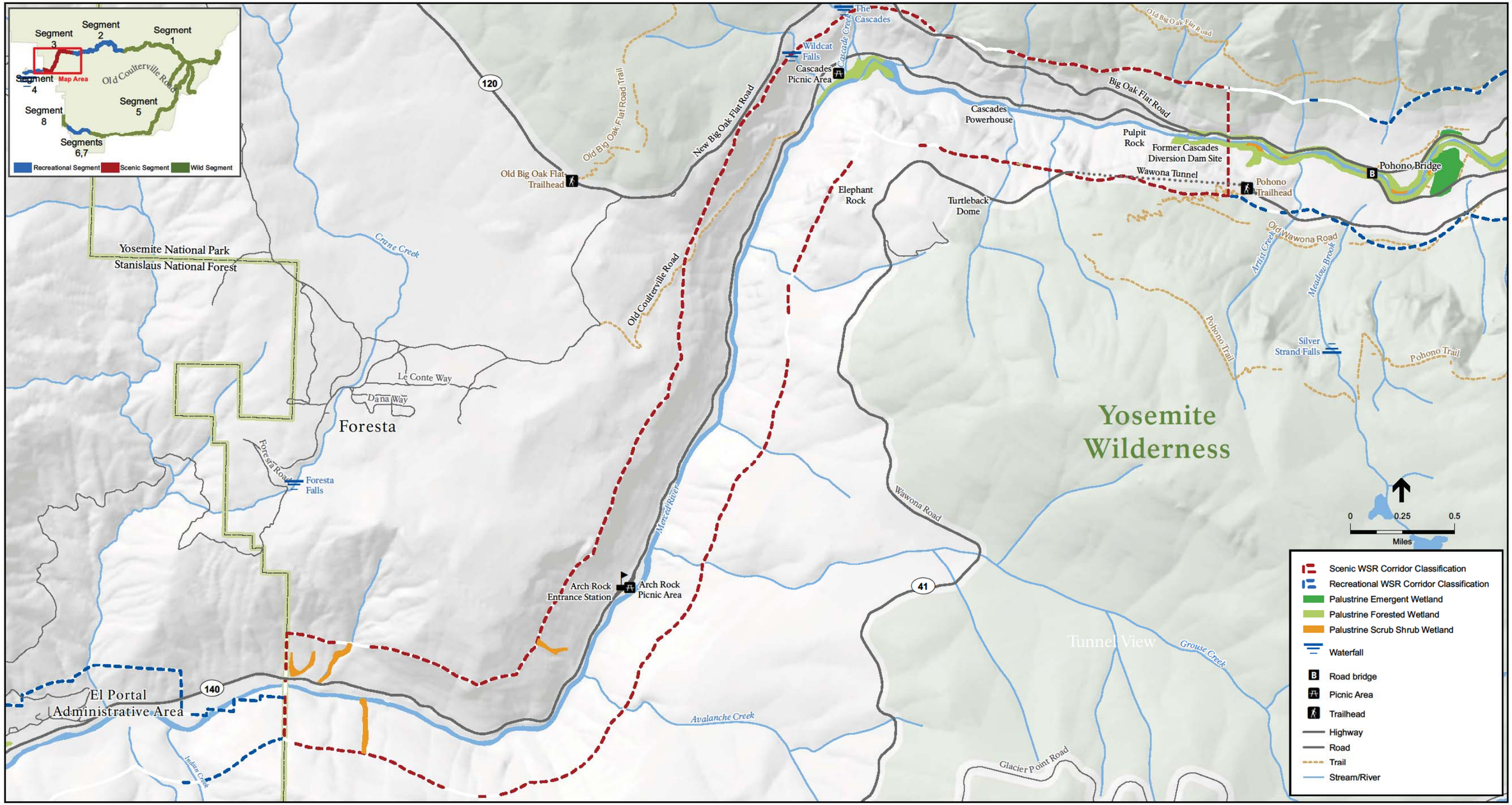
Figure O-4

Segment 2 - El Capitan Meadow, Cathedral Beach, and Sentinel Beach Wetlands

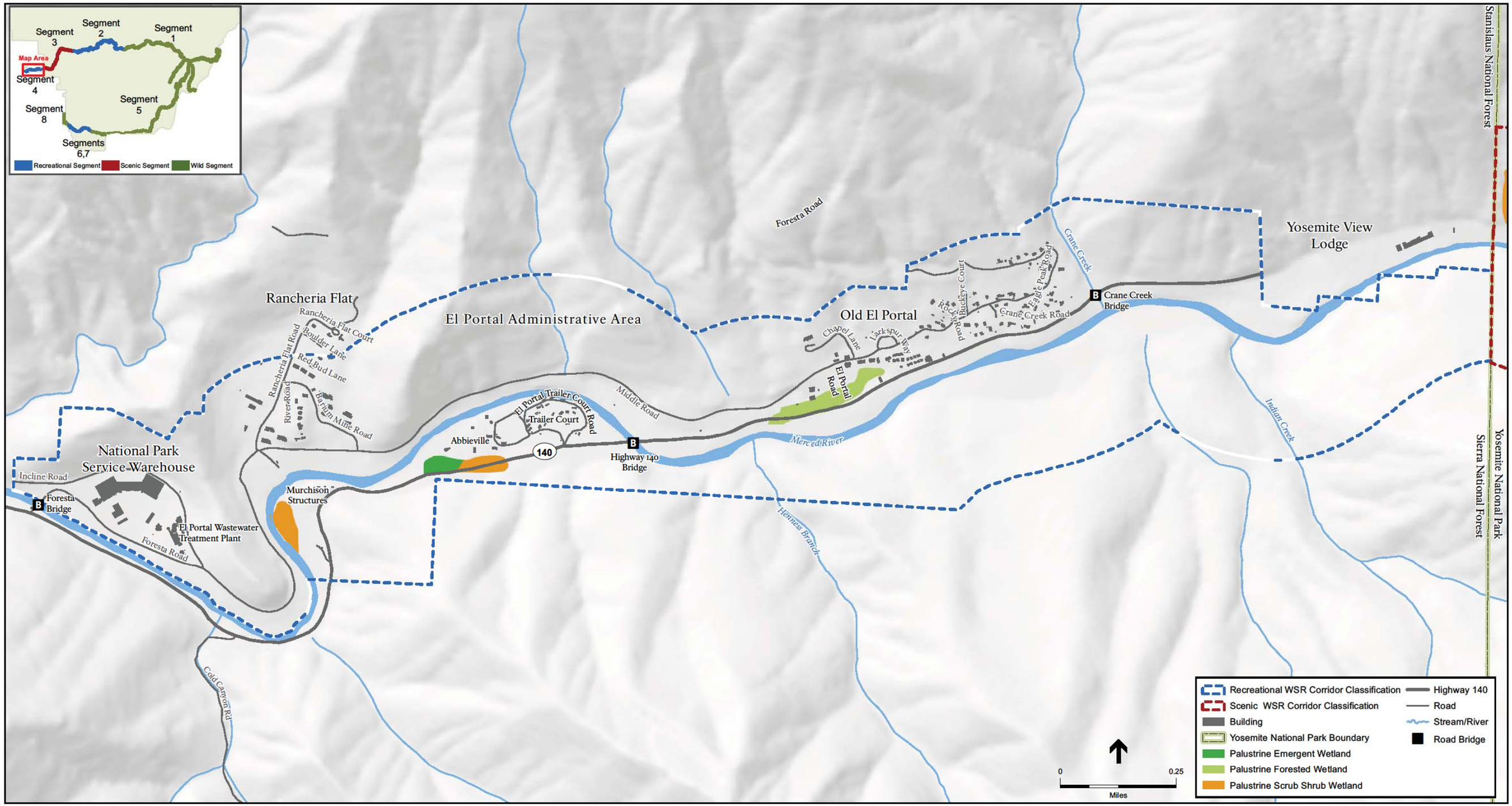


SOURCE: NPS, 1997, 2010, 2011

Merced Wild and Scenic River Final Comprehensive Management Plan / EIS . 210436

Figure O-5

Segment 3 - Merced Gorge Wetlands

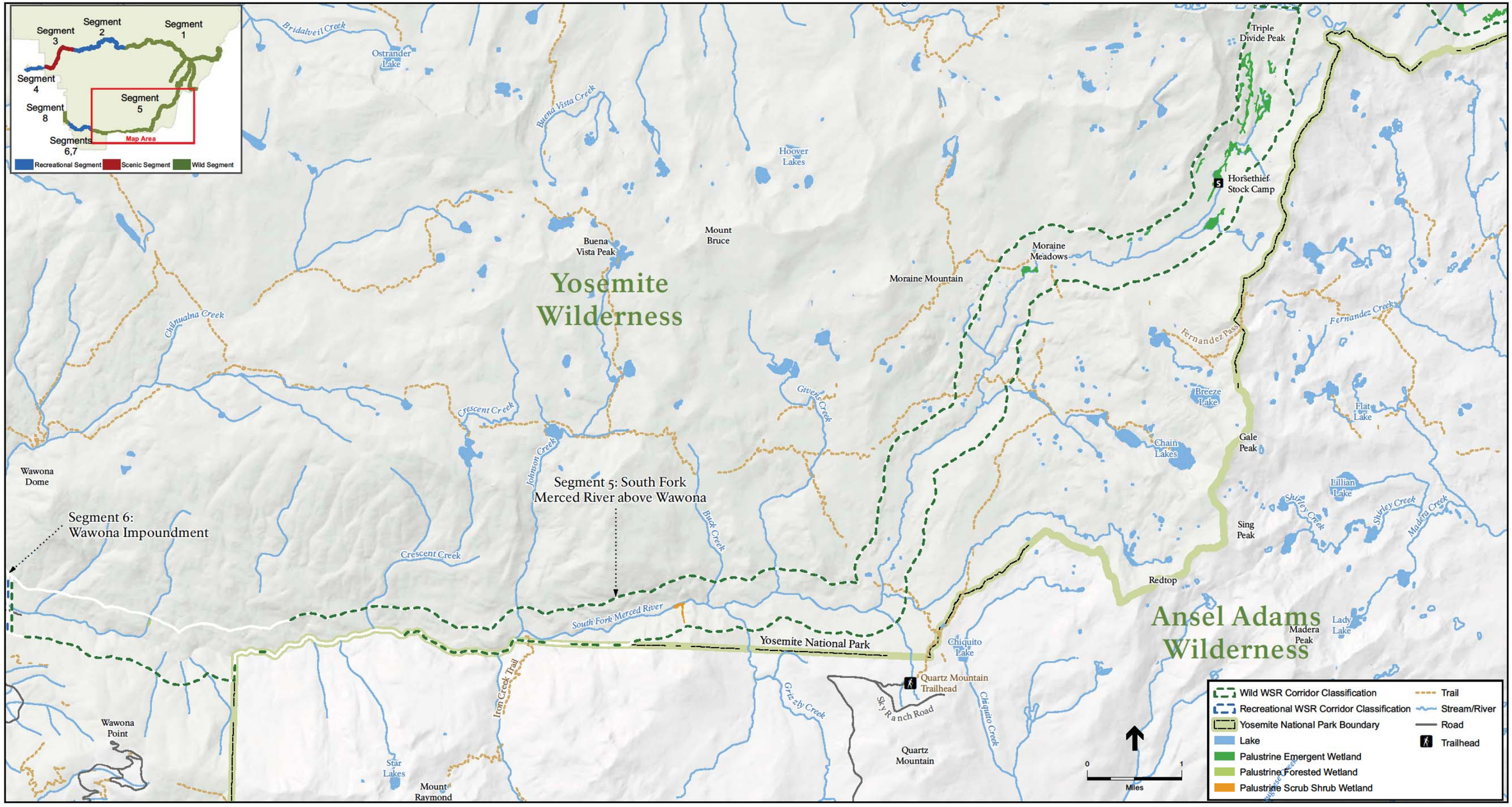


SOURCE: NPS, 1997, 2011

Merced Wild and Scenic River Final Comprehensive Management Plan / EIS . 210436

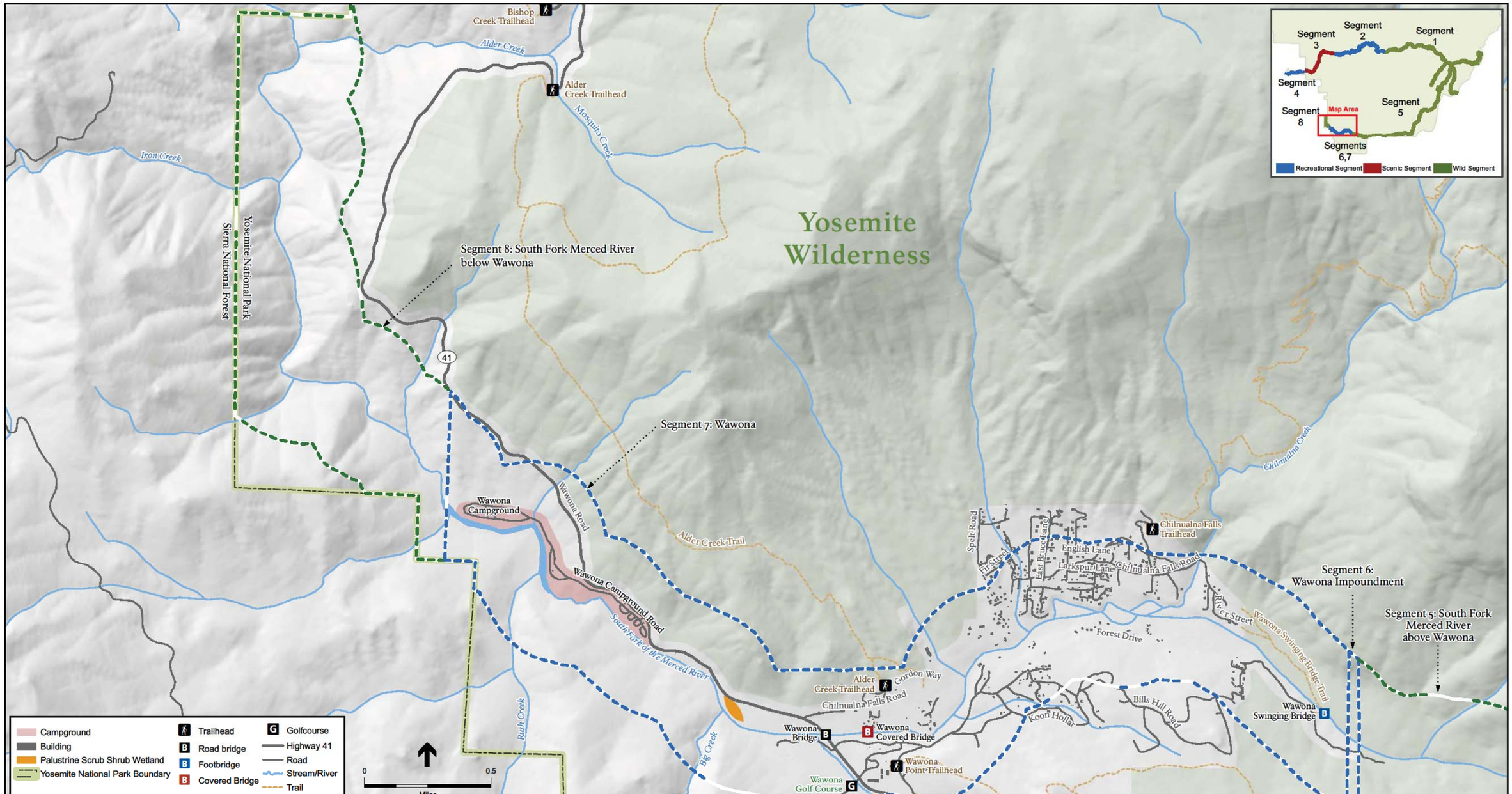
Figure O-6

Segment 4 – El Portal Wetlands



SOURCE: NPS, 1997, 2011

Figure O-7
Segment 5 - South Fork Merced River Above Wawona Wetlands



SOURCE: NPS, 1997, 2011

Merced Wild and Scenic River Final Comprehensive Management Plan / EIS . 210436

Figure O-8

Segments 6,7, and 8 -Wawona Impoundment, Wawona, and the South Fork Merced River Below Wawona Wetlands

shallows, saline lakeshores, playas) or sites lacking soil (e.g., rocky shores, gravel beaches) as wetland habitats if wetland hydrology is present. The reason these sites lack hydrophytic vegetation and/or hydric soil is due to natural chemical or physical factors. Although the Corps does not consider these sites to be wetlands, they are still subject to regulations under section 404 of the CWA as other waters of the United States. For purposes of this document, both Cowardin wetlands and waters of the United States as defined by the Corps are referred to as wetlands.

Wetland Characteristics

Specific wetland classes identified within the Merced River corridor include riverine (rivers, creeks, and streams), palustrine (shallow ponds, riparian wetlands, wet meadows, marshes), and lacustrine (lakes and ponds). Using the Cowardin classification system, specific wetland and deepwater classes within the Merced River corridor include:

- *Riverine upper perennial* – main channels of the Merced River and the South Fork Merced River (may be wetland or deepwater depending on depth)
- *Riverine intermittent* – intermittent tributaries to the Merced River and South Fork Merced River (wetlands)
- *Palustrine emergent* – emergent wetland habitat (marsh, meadow) along the Merced River and South Fork Merced River subject to various flooding regimes
- *Palustrine forested* – riparian forest wetland habitat along the Merced River and South Fork Merced River subject to various flooding regimes
- *Palustrine scrub shrub* – riparian scrub (e.g., willow) wetland habitat along the Merced River and South Fork Merced River and its tributaries subject to various flooding regimes
- *Lacustrine littoral* – shallow lake margins that are less than 2 meters deep at low water and have less than 30% vegetation cover*Lacustrine limnetic* – portions of lakes that are more than 2 meters deep at low water (e.g., Merced Lake, Washburn Lake) along the Merced River (deepwater habitat)

The following discussion provides general descriptions for each wetland class identified within the Merced River ecosystem.

Riverine Upper Perennial. Riverine upper perennial habitat within the corridor includes the open and flowing water of the Merced River and the South Fork Merced River. It is the permanently flooded rock-, cobble-, or sand-bottom channel with little to no in-stream vegetation. Occasional sandbars form within and at the channel edge and typically support willows and emergent (grasses and herbs) vegetation. Based on the NPS guidelines, the majority of the main stem of the Merced River and the South Fork Merced River would be classified as riverine upper perennial wetland. Channel portions that lie at a depth of 2 meters below low water would be considered deep water. The main channel of the Merced River and the South Fork Merced River would likely be considered as jurisdictional by the Corps under section 404 of the CWA, not as wetlands but as other waters of the United States.

Riverine Intermittent. Numerous riverine intermittent drainages (other waters of the United States) are tributary to the main stem Merced River and the South Fork Merced River. Almost all riverine intermittent drainages within the river corridor are classified as Cowardin wetlands and waters of the United States. These drainages often have a nonsoil substrate that is saturated and/or covered by shallow water at some time during the growing season. These wetlands are typically narrow and encompass the lowest portion of creekbeds. Very little wetland vegetation is found in these areas because of the intermittent nature of the flows within the

drainage channels. All aboveground drainages within the river corridor are subject to the NPS protection policies under Executive Order 11990. These drainages are classified as other waters of the United States and would be subject to sections 401 and 404 of the CWA.

Palustrine Emergent. Palustrine emergent wetland habitat includes portions of alpine, subalpine, and montane meadows and seeps. These wetland soils are generally deep and peaty, remaining saturated year-round or on a seasonal basis. Vegetation is dominated by grasses, sedges, rushes, and perennial herbs. The meadow wetlands in Yosemite National Park play a particularly critical role in the Merced River ecosystem. High spring flows create wet areas in side channels, low-lying wetlands, meadows, and cutoff channels. These areas support the concentration of organic matter, nutrients, microorganisms, and aquatic invertebrates throughout the relatively dry summer. When the flush of winter or spring flooding occurs, this stored aquatic biomass is washed into the main river channel, forming the base of the aquatic food chain. Examples of palustrine wetlands include portions of Cook's Meadow and meadows adjacent to Washburn and Merced Lakes. These meadow portions are considered wetlands under the Cowardin system, and portions of meadows may also meet the Corps' wetland criteria. Delineated palustrine emergent wetlands are subject to the NPS protection policies under Executive Order 11990 and section 404 of the CWA.

Palustrine Forested. Palustrine forested wetlands are the riparian forest habitats along the main stem of the Merced River and South Fork Merced River that are regularly inundated by normal high-water or flood flows. Palustrine forests within the upper reaches of the main stem of the Merced River and South Fork Merced River consist mainly of evergreen pines and firs, with occasional aspens. In Yosemite Valley, where the river is broad, shallow, and slow-moving, deciduous cottonwoods, willows, and alders dominate the riparian corridor. Substrate under the palustrine forest community varies from rock, gravel, sand, clays, loams, and mud. These areas are classified as either wetland or other waters of the United States by the Corps, depending on site-specific vegetation, soils, and hydrologic conditions, and would be subject to section 401 and/or 404 of the CWA.

Palustrine Scrub Shrub. This habitat type occurs sporadically along the banks of the main stem of the Merced River, the South Fork Merced River, and at lake margins. It is regularly inundated by normal high-water or flood flows. This habitat is dominated by various willows and often intergrades with meadow (palustrine emergent) and riparian (palustrine forest) communities. These communities are typically considered wetlands under the Cowardin system, would be subject to the NPS protection policies under Executive Order 11990, and typically meet the Corps' wetland criteria. These areas may meet the Corps' criteria of a wetland or other waters of the United States, depending on site-specific vegetation, soils, and hydrologic conditions, and may be subject to sections 401 and/or 404 of the CWA.

Lacustrine Littoral. Lacustrine littoral includes all wetland habitats within a lacustrine system. This classification extends from the shoreward boundary of the system to a depth of 2 meters below low water or to the maximum extent of emergent vegetation. These habitats are adjacent to deep-water lakes and reservoirs along the Merced River. These communities are typically considered wetlands under the Cowardin system, would be subject to the NPS protection policies under Executive Order 11990, and may meet the Corps' wetland criteria, depending on site-specific vegetation, soils, and hydrologic conditions, and may be subject to sections 401 and/or 404 of the CWA.

Lacustrine Limnetic. Lacustrine limnetic refers to deepwater lakes and reservoirs, such as Merced and Washburn lakes. Both lakes were formed along the Merced River by glacial activity. In-lake vegetation is typically limited to rooted aquatic grasses, floating vascular plants, and algae. Meadow (palustrine emergent) and riparian (palustrine forest and palustrine scrub shrub) communities generally border lake margins.

These lakes provide important habitat for fish, amphibians, reptiles, and other aquatic species. Substrate varies from rock, gravel, sand, and mud. Lacustrine limnetic (deepwater lakes and ponds) are classified as deepwater habitat based on the Cowardin system. These areas are typically classified as other waters of the United States by the Corps and would be subject to regulation under section 404 of the CWA.

Segment Descriptions

The characteristics of the individual segments within the Merced River corridor, including vegetation, connectivity and integrity have been summarized from the Draft EIS below.

Segment 1: Merced River Above Nevada Fall

Numerous small wetland meadows and adjacent riparian habitat are present in the upper Wilderness reaches of the Merced River corridor above Nevada Fall. These high-elevation meadows typically occur on fine-textured, permanently to semi-permanently wet soils generally associated with perennial streams, seeps, lake margins, or depressions. Vegetation consists of low-growing, native, tussock-forming grasses, sedges, rushes, and perennial herbs. Merced and Washburn lakes were formed where the Merced River canyon was carved by glaciers. In-lake vegetation is typically limited to rooted aquatic grasses, floating vascular plants, and algae. Meadow communities border lake margins. These wetland plant communities are hydrologically driven by the groundwater and flooding regime of the Merced River.

Much of the Merced River above Nevada Fall is bordered by a narrow riparian zone influenced by stream gradient, slope, sedimentation, and aspect. High-elevation tributaries to the Merced River are sparsely vegetated with scattered patches of alpine riparian scrub and alpine willow thickets. As the river descends and the gradient becomes gentler, lodgepole pines, aspens (*Populus tremuloides*), willows (*Salix* spp.), and alders (*Alnus* spp.) become more prevalent. Riparian communities of the upper Merced River are generally intact, except in a few locations where human use is intense.

Segment 2: Yosemite Valley

Wetlands in Yosemite Valley are formed in low-gradient land adjacent to the Merced River, its tributaries, or other bodies of water that are, at least periodically, influenced by flooding or high water tables. Wetlands within Yosemite Valley have undergone systematic alteration since the middle of the 19th century as they were grazed, farmed, and used as recreational sites and corridors for travel. Other alterations that took place in the early 20th century include drainage ditches that were constructed to dewater wet meadows to reduce mosquito breeding areas and provide open land for grazing and agriculture. Many of these drainage ditches have not been filled in and continue to dewater wet meadows in Yosemite Valley. Road construction has involved drainage measures and diversion of surface water adjacent to many of the valley's wetlands. This wetland complex was formerly much more interrelated and contiguous but has been fragmented by roads, trails, and infrastructure.

Riparian zones in Yosemite Valley extend outward from bank edges of the Merced River and its tributaries into adjacent meadow and forest communities. Situated at the interface between terrestrial and aquatic ecosystems, the riparian zone acts to buffer hydrology and erosional cycles, control and regulate biogeochemical cycles of nitrogen and other key nutrients, limit fire movements, and create unique microclimates for animal species. Riparian zones in Yosemite Valley are characterized by broadleaf deciduous trees, such as white alder (*Alnus rhombifolia)*, black cottonwood (*Populus trichocarpa*), big-leaf maple *(Acer*

macrophyllum), white fir, and willow species. Riparian vegetation is regularly disturbed by the deposition and removal of soil and the force of floodwaters. Plants in this zone colonize newly formed river-edge deposits readily. The distribution of riparian communities varies with soil saturation and frequency of disturbance.

Primary stressors on the condition of riparian habitats along the Merced River are related to high recreation use, channel stabilization measures, and dewatering due to infrastructure. Water, wastewater and electric lines and other utility infrastructure are located throughout Yosemite Valley (Segment 2), including some within wetland areas. Restoration efforts (prescribed burns, invasive plant eradication, fencing, and increasing inundation levels through restoration of natural drainage patterns, among others) have generally been successful at improving the overall condition of the Valley's riparian communities. However, certain riparian areas within the Valley continue to experience vegetation trampling and bank erosion from heavy recreation use. Additional riparian vegetation impacts are occurring along reaches that have been armored by revetments or other defensive structures for the protection of structures (i.e., bridges).

Segment 3 and 4: Merced Gorge and El Portal

As the Merced River cascades through the gorge, the channel gradient and bank slopes steepen, the river channel narrows, and the floodplains become considerably smaller than those of the Yosemite Valley. The steep gradient, combined with the boulders and cobbles of the riverbed and bank, forms a series of continuous rapids between Yosemite Valley and El Portal. The Merced River gorge is lined with a narrow band of riparian vegetation along the river course.

Flooding has been an important aspect of the development of riparian communities along the Merced River and its tributaries that intersect drier adjacent vegetation types of El Portal. Localized seasonal flooding creates debris dams in tributary channels, thus furthering a diversity of scour and depositional soils for riparian species. On the Merced River, natural flooding and vegetative patterns are influenced by the construction of levees and application of riprap to confine the river. These structures have destroyed riparian vegetation and have limited their reestablishment in some places.

In the El Portal area, riparian communities occur along tributaries of the Merced River, on flat topographical shaded terraces above the river, in backwater channels, and in areas where runoff from upland sites collects in natural depressions. Native Oregon ash (*Fraximus latifolia*), willow, and Fremont cottonwood (*Populus fremontii* ssp. *fremontii*) trees occur in the wetter areas, as well as orchard components in some locations. Foothill pines and valley oaks tend to dominate the drier terraces adjacent to riparian sites.

Oxbows, river terraces, and seasonal river channels were a part of the riparian wetlands of the area, but have been affected by early to mid-20th century development in what is now the El Portal Administrative Site. Many of the sites that would be characterized as palustrine have been affected to some degree. The remaining wetland areas that appear on the USFWS (1995) wetland inventory are riverine perennial wetlands and are in proximity to the Merced River or other stream drainages. Direct human intrusion into the riparian areas of this river zone, especially to the south, is minimal because of the topography and difficulty of access.

Segment 5 and 8: South Fork Merced River Above and Below Wawona

From its headwaters, the South Fork Merced River flows west at a relatively consistent but steep gradient through a glaciated alpine environment and then enters a V-shaped, unglaciated river valley. The upper South Fork supports limited riparian vegetation, primarily due to steep topography and high-velocity flows. The steep gradients along the upper and lower South Fork Merced River are not conducive to the

establishment of an extensive riparian zone. Typical riparian species — willow, alder, aspen, and maple — are restricted to a narrow fringe along the river. High-elevation tributaries to the South Fork Merced River are either unvegetated, high-velocity, and rocky in nature or are only sparsely vegetated. Subalpine meadows along the South Fork Merced River are similar in composition to those described for the upper main stem of the Merced River. Vegetation in alpine lakes is typically limited to rooted aquatic grasses, floating vascular plants, and algae. The upper South Fork is generally pristine and remains virtually undisturbed by human-related effects. The steep gradient below Wawona along the South Fork prevents the establishment of an extensive riparian zone. The limited riparian vegetation along the lower reach remains relatively untouched by human intrusion.

Segment 6 and 7: Wawona

In the Wawona area, the Merced River meanders through a large floodplain meadow (part of a deep alluvial valley) and has substantial gravel bars within the channel. As the river descends and the gradient becomes gentler, riparian vegetation (willows and alders) becomes more prevalent. Willows often colonize sandbars that are deposited at the margins of or within the river channel. In this area, the riparian corridor resembles the riparian corridor seen along the Merced River as it flows through Yosemite Valley. As with certain points within Yosemite Valley, trampling of riparian vegetation and associated erosion does occur in this area, resulting from heavy use in the vicinity of the Wawona Campground.

THE FINAL PREFERRED ALTERNATIVEIN THE MERCED RIVER PLAN

The Final Preferred Alternative of the *Merced River Plan/FEIS* would include significant restoration within 100 feet of the river and in meadow and riparian areas, maintaining daily visitation in Yosemite Valley to accommodate the same peak levels observed in recent years, reducing unnecessary facilities and services, and converting facilities from administrative use to public use where feasible. The final preferred alternative envisions broad ecological restoration goals, including essential restoration of riverbanks and meadow and riparian habitat. Proposed restoration actions are feasible and achievable, and leverage engineering and design features to enhance meadow and floodplain connectivity and free-flowing condition. Much of the development footprint within 100 feet of the river is removed corridorwide. Targeted infrastructure within the bed and banks of the river is removed, and those areas ecologically restored.

Actions to manage visitor use and facilities under the final preferred alternative, specifically those concerning vehicle access and overnight accommodations, would result in a 5% increase in lodging accommodations. The campsite inventory would increase by 36% in the Merced River corridor and 37% in Yosemite Valley. All campsites within 100 feet of the river would be removed. Campsite losses would be offset with the addition of new camping adjacent to Upper Pines Campground and east of the Camp 4 Campground, as well as new sites west of Backpackers Campground, and in the former Upper and Lower River Campground area. Under the final preferred alternative, there would be a net increase of 19% in Yosemite Valley overnight use. This would largely result from the increase in units at Curry Village. Management actions related to lodging would focus on removing lodging from the ordinary high-water mark and Housekeeping Camp, and slightly reducing lodging in wilderness. Some tent cabins in the Boys Town area would be replaced with hard-sided lodging in Curry Village to increase the availability of year-round accommodations.

The final preferred alternative would restore approximately 189 acres of vegetation, including 37.75 acres of wetlands, as a result of actions common to Alternatives 2-6 in conjunction with actions specific to the final

preferred alternative. Actions to manage visitor use and facilities would result in the loss of approximately 2.67 acres of wetlands as a result of actions specific to the final preferred alternative.

For a detailed description of the Final Preferred Alternative, refer to Vol. I, Chapter 8 of the *Merced River Plan/FEIS*.

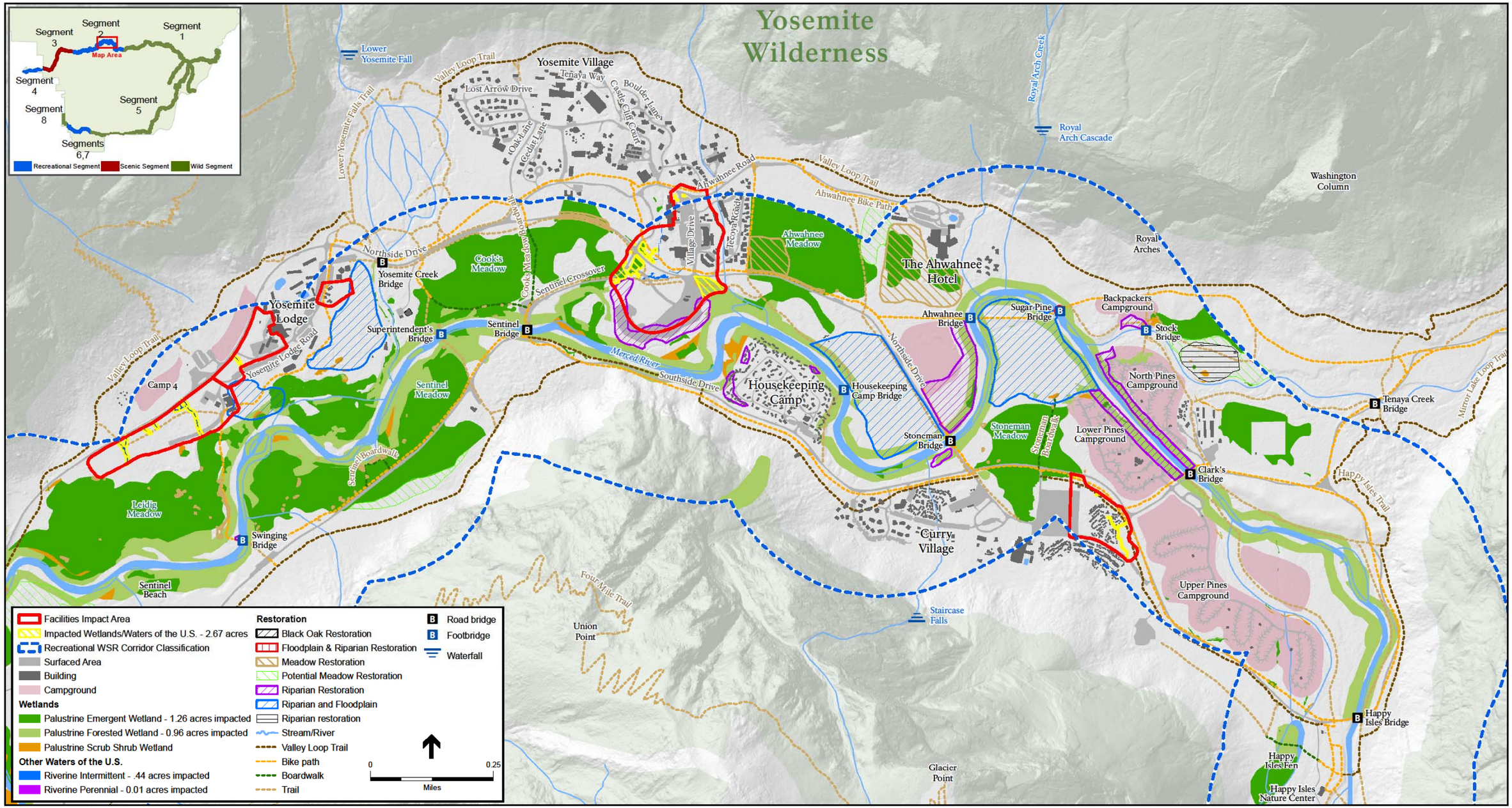
ENVIRONMENTAL CONSEQUENCES OF THE PROPOSED ACTION ON WETLANDS

The purpose of the Merced River Plan is to provide a comprehensive management plan for the protection of the Merced River's free-flowing condition, water quality, and the values that make the river worthy of designation. The final preferred alternative, Alternative 5: Enhanced Visitor Experiences and Essential Riverbank Restoration, includes management action in Segments 1-8 of the Merced River corridor which would affect wetlands. Though the overall impact would be long-term and beneficial, some localized actions would have an adverse impact on wetlands. A more detailed description of the final preferred alternative is included in the "Alternatives" (Chapter 8) of the *Merced River Plan/FEIS*. The following is a summary of actions that could have an effect on wetlands. A summary of cumulative impacts follows.

Proposed New Development in the Final Preferred Alternative of the *Merced River Plan/FEIS*

Segment 2: Yosemite Valley

Construction activities associated with new development in Segment 2 would result in direct, temporary and permanent losses of native vegetation as well as the redevelopment of existing developed areas. Outside of previously developed areas, the majority of new development in Segment 2 would occur in upland habitats and would not directly impact wetlands. However, direct impacts to wetlands would occur at Curry Village, Yosemite Village Day-use Parking Area, and Yosemite Lodge and Camp 4 (see Figure O-9 through Figure O-12 and Table O-2). Construction activities at Curry Village would result in direct, permanent losses of federally protected wetlands. Impacts to wetlands would occur in palustrine emergent wetlands associated with Stoneman Meadow and intermittent channels flowing through the area. Approximately 0.06 acres of potentially jurisdictional wetland features would be directly and permanently impacted by the re-designed overnight visitor accommodations at Boys Town in Curry Village under the final preferred alternative. Construction activities at the Yosemite Village Day-use Parking Area would result in direct, temporary and permanent losses of federally protected wetlands. Impacts to wetlands would occur in palustrine emergent wetlands located adjacent to the Northside Drive and Sentinel Crossover intersection, palustrine forested wetlands associated with the Merced River, and intermittent channels flowing through the area. Approximately 2.56 acres of potentially jurisdictional wetland features would be directly and permanently impacted by the redesign of the Yosemite Village Day-use Parking Area and associated intersection and roadway improvements by the proposed actions under the final preferred alternative. Construction activities at Yosemite Lodge and Camp 4 would result in direct, permanent losses of federally protected wetlands. Impacts to wetlands would occur in palustrine emergent wetlands and along the Merced River and in intermittent channels flowing through the area. Approximately 0.05 acres of potentially jurisdictional wetland features would be directly and permanently impacted by the Yosemite Lodge Parking Area and replacement of temporary housing at Highland Court with new permanent housing under the final preferred alternative.



SOURCE: NPS, 1997, 2006, 2010, 2011

Merced Wild and Scenic River Final Comprehensive Management Plan/EIS. 210436

Figure O-9

Segment 2 - Overview of Preferred Alternative Wetland Impacts

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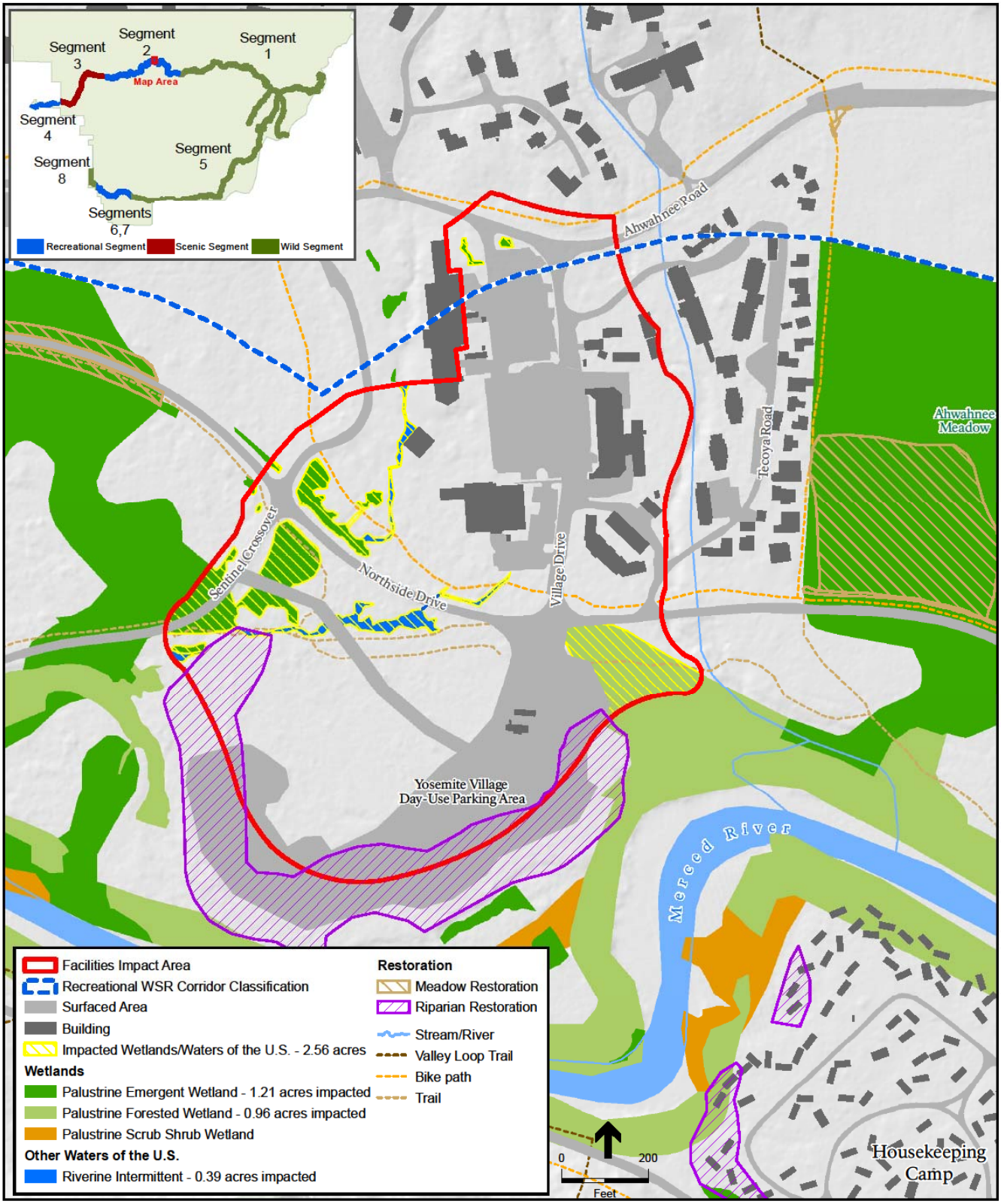

SOURCE: NPS, 1997, 2006, 2010, 2011

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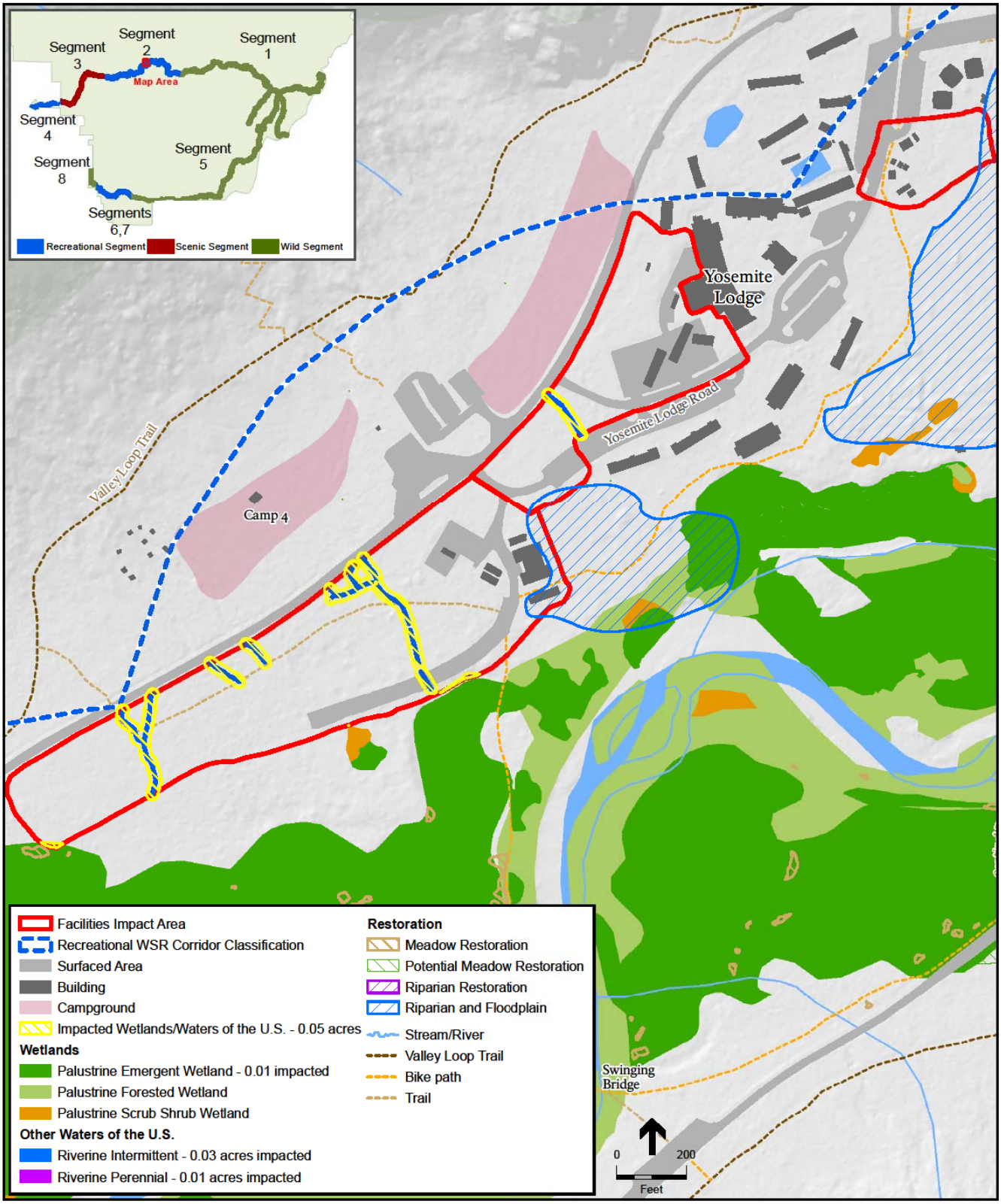
Figure O-10

Segment 2 - Preferred Alternative Camp 6 and Yosemite Village Wetland Impacts



SOURCE: NPS, 1997, 2006, 2010, 2011

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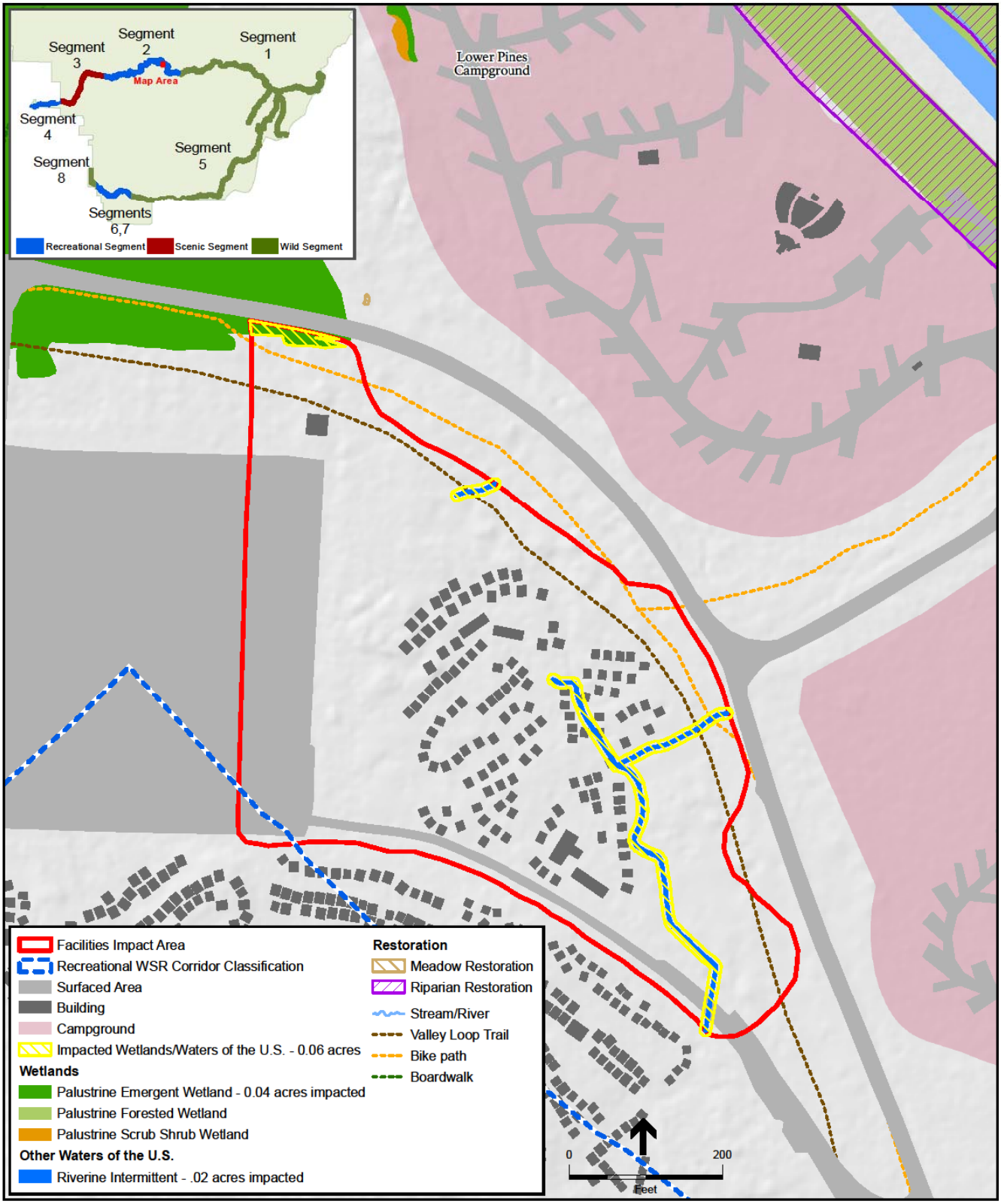
Figure O-11

Segment 2 - Preferred Alternative

Yosemite Lodge and Camp 4 Wetland Impacts



SOURCE: NPS, 1997, 2006, 2010, 2011

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Figure O-12

Segment 2 - Preferred Alternative
Curry Village Wetland Impacts

TABLE O-2: SUMMARY OF WETLAND IMPACTS IN SEGMENT 2 –FINAL PREFERRED ALTERNATIVE

Wetland Type	Boys Town	Yosemite Village	West of Yosemite Lodge	Total
Palustrine Emergent	0.04	1.21	0.01	1.26
Palustrine Forested	0	0.96	0	0.96
Riverine Intermittent	0.02	0.39	0.03	0.44
Riverine Perennial	0	0	0.01	0.01
SOURCE: NPS 2012c				

Losses to these wetlands would occur through site clearing, filling, grading, and subsequent development. Wetlands that cannot be avoided and would be permanently filled must be compensated to result in "no net loss" of wetlands. Adherence to proposed best management practices and mitigation measures, and avoidance of wetlands during construction where possible, would reduce direct impacts to wetlands to local, short-term, minor and adverse.

Construction activities associated with new development in Segment 2 may also generate indirect impacts to wetlands. Construction would involve activities such as grading and excavation that would generate loose, erodible soils. These activities could result in substantial erosion off-site to adjacent wetlands, resulting in decreases in water quality due to sedimentation. Other indirect impacts include potential modifications to flow, circulation, hydroperiod, or other aspects of the hydrologic regime; human intrusion into wetlands; and temporary impacts to wetlands. However, post-construction, temporarily impacted areas would be restored. Adherence to proposed best management practices and mitigation measures, and avoidance of wetlands during construction where possible, would reduce indirect impacts to wetlands to local, short-term, minor and adverse.

Segment 4: El Portal

Construction activities associated with new development in Segment 4 would result in direct, temporary and permanent losses of native vegetation as well as the redevelopment of existing developed areas. Outside of previously developed areas, new development in Segment 4 would occur in upland habitats and would not directly impact wetlands. However, construction activities associated with the El Portal Remote Visitor Parking, the removal of Odger's Fuel Storage Facility, and restoration of the Greenemeyer Sandpit may generate indirect impacts to wetlands. Construction would involve activities such as grading, excavation, and demolition that would generate loose, erodible soils. These activities could result in substantial erosion off-site to adjacent wetlands, resulting in decreases in water quality due to sedimentation. Other indirect impacts include potential modifications to flow, circulation, hydroperiod, or other aspects of the hydrologic regime; human intrusion into wetlands; and temporary impacts to wetlands. However, post-construction, temporarily impacted areas would be restored. Adherence to proposed best management practices and mitigation measures, and avoidance of wetlands during construction where possible, would reduce indirect impacts to wetlands to local, long-term, minor and adverse.

Segment 7: Wawona

Construction activities associated with new development in Segment 7 would result in direct, temporary and permanent losses of native vegetation as well as the redevelopment of existing developed areas. Outside of previously developed areas, new development in Segment 7 would occur in upland habitats and would

not directly impact wetlands. However, construction activities associated with new development in Segment 7 may generate indirect impacts to channels and waters of the US. Construction would involve activities such as grading and excavation that would generate loose, erodible soils. These activities could result in substantial erosion off-site to adjacent wetlands, resulting in decreases in water quality due to sedimentation. Other indirect impacts include potential modifications to flow, circulation, hydroperiod, or other aspects of the hydrologic regime; human intrusion into wetlands; and temporary impacts to wetlands. However, post-construction, temporarily impacted areas would be restored. Adherence to proposed best management practices and mitigation measures, and avoidance of wetlands during construction where possible, would reduce indirect impacts to wetlands to local, long-term, minor and adverse.

Restoration

Proposed restoration management actions under the final preferred alternative would improve hydrologic function and restore ecological integrity of the Merced River corridor, including associated plant communities and wetlands. Management actions under the final preferred alternative would result in the restoration of approximately 37.98 acres of wetlands in Segments 2 and 4, which represents a corridorwide, long-term, moderate, beneficial impacts on wetlands.

The primary components which would benefit wetlands in all segments (Segments 1-8) in the long-term include the following:

- *Removal of Abandoned Infrastructure* – Abandoned underground infrastructure would be removed that alters hydrology, including remnants of abandoned sewer treatment facilities, sewer and water lines, and manholes. This infrastructure currently contributes to dewatering of meadows and wetlands, and alteration of the natural hydrologic regime of the Merced River. Areas of removed infrastructure would be restored to natural conditions, including revegetation with native plants.
- *Restoration of Eroded and Vulnerable Riverbanks* – Areas with denuded vegetation and areas susceptible to erosion would be stabilized and revegetated with native plants. Re-vegetated areas would be protected using closure signs, fencing, and/or other natural barriers such as rocks and logs as deterrents.
- *Protection of the Riparian Zone* – The riparian zone would be protected from new development within 150' from the ordinary high-water mark. Campsites within 100' feet of the ordinary high-water mark would be removed or relocated.
- *Removal and Replacement of Riprap* –Riprap would be removed where possible to restore natural river processes. Riprap would be replaced with native riparian vegetation, using bioengineering techniques if riverbank stabilization is still necessary for infrastructure protection.
- *Addressing Trails in Sensitive Habitat* – Trails would be rerouted out of sensitive habitats or boardwalks would be installed through wetlands. New trail routes should avoid wetlands and special-status species habitat.

In Segment 1, additional actions include requiring administrative pack stock to feed on pellet feed that is packed into the site instead of allowing pack stock to graze in meadow areas. This would help protect meadow vegetation from high levels of grazing by reducing the level of vegetation trampling by administrative pack stock and reducing the dispersal of manure and roll pits.

In Segment 2, the location of some roads and trails bisect or otherwise cross through meadows and cause fragmentation, soil compaction, and vegetation trampling of Valley meadows. Additionally, these roads and trails limit or disrupt meadow hydrologic connectivity. To address these issues, fill would be removed from

wetlands and sensitive areas at the Ahwahnee Meadow, boardwalks would be installed in wet areas, and culverts would be added to improve hydrologic connectivity. Stoneman Meadow would be restored by removing roadside parking and unnatural fill material, and extending fencing to protect wetlands, and the Curry Orchard parking lot would be redesigned to promote water flow from the cliff walls to Stoneman Meadow. In addition, fencing would be installed along the northern perimeter of El Capitan Meadow and boardwalks, and viewing platforms would be installed to reduce habitat fragmentation; boardwalks would be constructed at the Valley Loop Trail as well to reduce impacts on wet meadow habitat in Slaughterhouse Meadow. These actions would collectively improve meadow and wetland habitat integrity, and enhance contiguity of meadow habitats as well as hydrological connectivity between meadow, riparian, and floodplain habitats.

In Segment 4, the Greenemeyer Sandpit contains fill material that precludes natural flooding and regeneration of riparian plant communities. The Greenemeyer Sandpit would be restored to natural conditions. Fill material would be removed and the topography recontoured. Native riparian vegetation would be planted to restore the natural vegetation for the site. Abbieville and the Trailer Village contain impacts of former development, including paved roads and parking and compacted soils within 150 feet of the riverbanks. Asphalt and imported fill would be removed. The area would be recontoured and planted with native riparian species and oaks.

Overall, restoration activities have the potential to create localized, short-term, minor, adverse impacts. For example, construction activities associated with restoration management actions could result in damage to or removal of vegetation, and the potential introduction and spread of invasive nonnative species. However, restoration activities are anticipated to result in net long-term, beneficial impacts as natural ecological processes are restored.

FUNCTIONS AND VALUES

This section describes the functions and values of the wetland types impacted under the final preferred alternative: Palustrine emergent wetlands, palustrine forested wetlands, riverine intermittent wetlands, and riverine perennial wetlands. The following functions and values were evaluated based on those described in Procedural Manual #77-1:

- *Biotic functions,* including fish and wildlife habitat, plant productivity, native species, habitat diversity, threatened and endangered species;
- *Hydrologic functions,* including flood attenuation, streamflow maintenance, groundwater recharge and discharge, water supply, erosion and sediment control, water purification, and detrital export to downstream systems;
- *Cultural values,* including aesthetics, education, historical values, archaeological values, recreation, and interpretation;
- *Research/scientific values,* including potential references sites for scientific research; and
- *Economic values,* including flood protection, fisheries, and tourism.

Palustrine Habitats

Biotic Functions

The relatively dense layer of herbaceous vegetation in the palustrine emergent wetlands provides a variety of benefits for many wildlife species. In particular, the meadow communities provide foraging habitat for raptors and perennial range habitat for deer to bed and forage. The palustrine forested wetlands provide several benefits for wildlife species; specifically, it provides nesting and perching habitat for several species of birds, and leaf litter provides habitat for smaller animals. All the palustrine wetlands provide habitat for pollinators and other invertebrates.

Hydrologic Functions

Palustrine habitats could play an important role in flood attenuation and sediment retention. In addition, wetlands located below roads and other developed areas may serve to retain sediment and degrade nutrients before the runoff enters downstream systems.

Cultural Values

The palustrine habitats in the study area do not contain any known archaeological sites. Apparent cultural values inclue the significant aesthetic values that meadow and riparian wetlands provide, particularly in contrast to the steep, rocky walls of the valley. Interpretive guides and the meadow clearings that allow majestic views of the park have brought appreciation and awareness of wetlands to the millions of park visitors that have visited the area for decades.

Research/Scientific Values

Palustrine habitats, particularly emergent wetlands, provide rich opportunities for scientific research. Climate change, development, and vegetation management practices have caused changes in plant communities in the meadows. Such changes may be reflected in the floodplain sediments through charcoal debris and the pollen record, which may be amendable to scientific study.

Economic Values

For the reasons listed above, the palustrine habitats could provide significant economic value for flood protection, biological resources (in particular fisheries), and tourism.

Riverine Habitats

Biotic Functions

The Merced River provides a year-round water source for wildlife and habitat for fish and aquatic invertebrates. The intermittent channels provide a seasonal water source for wildlife and invertebrates. Because the unconsolidated shore habitats lack vegetation and usually lack water, they may not provide significant habitat or food sources for wildlife.

Hydrologic Functions

The hydrologic functions of the Merced River are flood attenuation, streamflow maintenance, water supply, erosion control, sediment retention, water purification, and detrital export (including large woody debris) to downstream systems. Additionally, because of the coarse texture of the sediments that make up the Merced River channel, riverine habitats along the Merced River could offer some degree of groundwater recharge function. The intermittent channels are periodic water sources and therefore provide less function; however, they nevertheless contribute streamflow maintenance, water supply, erosion control, sediment retention, water purification, and detrital export to downstream systems.

Cultural Values

Because Native Americans are known to have focused some activities along streams, riverine habitats may provide archaeological value. Perennial channels also provide an aesthetic value. Visitors to the park enjoy the Merced River and engage in activities such as swimming, boating, fishing, and photography. The seasonal water flow and seasonal lack of vegetation in the intermittent channels limit the aesthetic value of these habitats.

Research/Scientific Values

The riverine habitats may provide opportunities for research in groundwater-vegetation relationships and in the effectiveness of riparian habitat restoration techniques.

Economic Values

For the reasons listed above, the riverine habitats could provide significant economic value for flood protection, biological resources (in particular fisheries), and tourism.

JUSTIFICATION

Alternatives Considered

The range of alternatives considered in the *Merced River Plan FEIS*, presented in the "Alternatives" (Chapter 8), include the No Action Alternative (Alternative 1), Self-Reliant Visitor Experiences and Extensive Floodplain Restoration (Alternative 2), Dispersed Visitor Experiences and Extensive Riverbank Restoration (Alternative 3), Resource-based Visitor Experiences and Targeted Riverbank Restoration (Alternative 4), and Diversified Visitor Experiences and Selective Riverbank Restoration (Alternative 6).

Alternative 1

Alternative 1 provides a baseline on which to compare impacts from Alternatives 2 through 6. However, with wetland impact minimization and various restoration measures included in the preferred alternative, Alternative 1 may not necessarily be less damaging overall to wetlands because it would forego numerous opportunities for restoration. Further, it does not accomplish the purpose of the project.

Alternative 2

The guiding principles of Alternative 2 include maximizing the restoration of the 100-year floodplain by removing infrastructure not essential to resource-related recreation, and creating a more self-reliant visitor experience, where less commercial services are available. Visitor-use levels are managed to allow for visitor experiences free of crowding or congestion. Alternative 2 would restore up to approximately 342 acres of vegetation, including 47.03 acres of wetlands, as a result of actions common to Alternatives 2-6 and those specific to Alternative 2. Actions to manage visitor use and facilities would result in the loss of approximately 32.37 acres of vegetation and the permanent loss of 2.87 acres of potentially jurisdictional wetlands as a result of actions specific to Alternative 2. This alternative includes large-scale wetland restoration actions including removal of the road through Stoneman Meadow, removal of Northside Drive through Ahwahnee Meadow, removal of parking outside the 10-year floodplain at the Yosemite Village Day Use Parking Area, the removal of roadside parking along Yosemite Valley meadows complete closure and ecological restoration of Housekeeping Camp, and the restoration of Wawona Golf Course to meadow habitat. These actions are possible when coupled with the decrease in daily Yosemite Valley visitation proposed under Alternative 2.

Alternative 3

The guiding principles of Alternative 3 include restoration of large portions of the floodplain and the riparian area within 150 feet of the river. This alternative accommodates much lower maximum visitor use levels than today, and offers fewer commercial services and facilities. Visitor use levels are managed to allow for dispersed visitor experiences free of crowding or congestion. Alternative 3 would restore approximately 308 acres of vegetation, including 46 acres of wetlands, as a result of actions common to Alternatives 2-6 in conjunction with actions specific to Alternative 3. Actions to manage visitor use and facilities would result in the loss of approximately 31.66 acres of vegetation and the permanent loss of 2.75 acres of potentially jurisdictional wetlands as a result of actions specific to Alternative 3. This alternative includes robust wetland restoration actions including removal of the road through Stoneman Meadow, removal of Northside Drive through Ahwahnee Meadow, removal of parking outside the 10-year floodplain at the Yosemite Village Day Use Parking Area, the removal of roadside parking along Yosemite Valley meadows and the restoration of Wawona Golf Course to meadow habitat.

Alternative 4

The guiding principles of Alternative 4 include restoration of portions of the floodplain and the riparian area within 150 feet of the river. This alternative focuses on providing only those commercial services and facilities that facilitate resource-based visitor experiences. It accommodates lower maximum visitor use levels than today, with large increase in overnight camping capacity and moderate decreases in the overnight lodging capacity. Alternative 4 would restore approximately 225 acres of vegetation, including 43.88 acres of wetlands, as a result of actions common to Alternatives 2-6 and those specific to Alternative 4. Actions to manage visitor use and facilities would result in the loss of approximately 34.57 acres of vegetation and the permanent loss of 2.67 acres of potentially jurisdictional wetlands as a result of actions specific to Alternative 4. This alternative includes targeted wetland restoration actions including removal of the road through Stoneman Meadow, removal of parking 150 feet away from the river at the Yosemite Village Day Use Parking Area, and the removal of roadside parking along Yosemite Valley meadows.

Alternative 6

The guiding principles of Alternative 6 include limited restoration within 100 feet of the river and in meadow and riparian areas, infrastructure improvements to accommodate growth in peak daily visitation in Yosemite Valley, and expansion of facilities and services to allow for diversified visitor experiences. Alternative 6 would restore approximately 176 acres of vegetation, including 37.83 acres of wetlands, as a result of actions common to Alternatives 2-6 and those specific to Alternative 6. Actions to manage visitor use and facilities would result in the loss of approximately 36.89 acres of vegetation and the permanent loss of 2.67 acres of potentially jurisdictional wetlands as a result of actions specific to Alternative 6. This alternative includes focused wetland restoration actions including removal of parking 150 feet away from the river at the Yosemite Village Day-use Parking Area and the removal of roadside parking along Yosemite Valley meadows.

Nonwetland Alternatives to the Final Preferred Alternative

The *Merced River Plan/FEIS* involves comprehensive management within the Merced River corridor, which includes riverine, palustrine and lacustrine habitat. The purpose of the Merced River Plan is to provide a comprehensive management plan for the protection of the Merced River's free-flowing condition, water quality, and the values that make the river worthy of designation. There are no alternatives to the proposed action that could be located outside the floodplain or wetland and aquatic habitat of the Merced River corridor, as the plan is focused upon enhancements to aquatic habitats.

Design or Modifications to Minimize Harm to Wetlands

Mitigation Measures

A full list of mitigation measures prescribed for the *Merced River Plan/FEIS* are outlined in Appendix C. Mitigation measures specific to wetland resources are summarized below. The National Park Service (and its contractors) shall implement the following mitigation measures, as appropriate, prior to, during, and/or after construction activities. Specific tasks would include, but are not limited to, the following:

Hydrology and Water Quality

- **MM-HYD-1.** Contractor shall prepare and implement a Stormwater Pollution Prevention Plan (SWPPP) that designates construction best management practices to be used to control the sources of fine sediment and to capture and filter it before entering the river. The SWPPP shall define the characteristics of the site, identify the type of construction that will be occurring, and describe the practices that will be implemented to control erosion and the release of pollutants in stormwater. At a minimum, the SWPPP shall address the following, as applicable:

  Stabilization Practices

  – The stabilization practices to be implemented shall specify the intended stabilization practices, which may include one or more of the following: temporary seeding, mulching, geotextiles, sod stabilization, vegetative buffer strips, erosion control mats, protection of trees, preservation of mature vegetation, etc. On the daily CQC Report, the Contractor shall record the dates when the major grading activities occur, (e.g., clearing and grubbing, excavation, embankment, and/or grading); when construction activities temporarily or permanently cease on a portion of

the site; and when stabilization practices are initiated. Unless otherwise directed by the Contracting Officer for the reasons below (i.e., unsuitable conditions or no activity for less than 21 days), stabilization practices shall be initiated as soon as practicable, in any portion of the site where construction activities have temporarily or permanently ceased, but no more than 14 calendar days after the activities cease.

– Unsuitable Conditions - Where the initiation of stabilization measures by the 14th day after construction activity temporarily or permanently ceases is precluded by unsuitable conditions caused by the weather, stabilization practices shall be initiated as soon as practicable after conditions become suitable.

– No Activity for Less Than 21 Days - Where construction activity will resume on a portion of the site within 21 days from when activities ceased (e.g., the total time period that construction activity is temporarily ceased is less than 21 days), then stabilization practices do not have to be initiated on that portion of the site by the 14th day after construction activity temporarily ceased.

Structural Practices

– The Contractor shall implement structural practices to divert flows from exposed soils, temporarily store flows, or otherwise limit runoff and the discharge of pollutants from exposed areas of the site. Structural practices shall be implemented in a timely manner during the construction process to minimize erosion and sediment runoff. Location and details of installation of structural practices shall be depicted on the construction drawings.

Silt Fences

– The Contractor shall provide silt fences as a temporary structural practice to minimize erosion and sediment runoff. Silt fences shall be properly installed to effectively retain sediment immediately after completing each phase of work where erosion would occur in the form of sheet and rill erosion (e.g. clearing and grubbing, excavation, embankment, and grading). Silt fences shall be installed in the locations indicated on the drawings or as needed based on Contractor operations. Final removal of silt fence barriers shall be upon approval by the Contracting Officer.

– Silt fences shall extend a minimum of 16 inches above the ground surface and shall not exceed 34 inches above the ground surface. Filter fabric shall be from a continuous roll cut to the length of the barrier to avoid the use of joints. When joints are unavoidable, filter fabric shall be spliced together at a support post, with a minimum 6-inch overlap, and securely sealed. A trench shall be excavated approximately 4 inches wide and 4 inches deep on the upslope side of the location of the silt fence. The 4-inch by 4-inch trench shall be backfilled and the soil compacted over the filter fabric. Silt fences shall be removed upon approval by the COR.

Straw Bales

– Straw bales are not authorized for use in storm water control in Yosemite National Park as they have the potential to introduce exotic species into the Park environment.

Diversion Dikes

– Diversion dikes shall have a maximum channel slope of 2 percent and shall be adequately compacted to prevent failure. The minimum height measured from the top of the dike to the bottom of the channel shall be 18 inches. The minimum base width shall be 6 feet and the minimum top width shall be 2 feet. The Contractor shall ensure that the diversion dikes are not damaged by construction operations or traffic. Diversion dikes shall be located as shown on the drawings or as needed based on Contractor operations. Location of diversion dikes shall be

fully coordinated with cultural and natural environmental protection requirements described in Section 01355, Natural, Cultural, and Physical Resources Protection.

Filter Fabric

– The geotextile shall comply with the requirements of ASTM D 4439, and shall consist of polymeric filaments that are formed into a stable network such that filaments retain their relative positions. The filament shall consist of a long-chain synthetic polymer composed of at least 85 percent by weight of ester, propylene, or amide, and shall contain stabilizers and/or inhibitors added to the base plastic to make the filaments resistance to deterioration due to ultraviolet and heat exposure. Synthetic filter fabric shall contain ultraviolet ray inhibitors and stabilizers to provide a minimum of six months of expected usable construction life at a temperature range of 0 to 120 degrees F. The filter fabric shall meet the following requirements:

FILTER FABRIC FOR SILT SCREEN FENCE

Physical Property	Test Procedure	Strength Requirement
Grab Tensile	ASTM D 4632	100 lbs. min.
Elongation (%)		30 % max.
Trapezoid Tear	ASTM D 4533	55 lbs. min.
Permittivity	ASTM D 4491	0.2 sec^{-1}
AOS (U.S. Std Sieve)	ASTM D 4751	20-100

Silt Fence Stakes and Posts

– The Contractor may use either wooden stakes or steel posts for fence construction. Wooden stakes utilized for silt fence construction, shall have a minimum cross section of 2 inches by 2 inches when hardwood is used and 4 inches by 4 inches when softwood is used, and shall have a minimum length of 5 feet. Steel posts (standard "U" or "T" section) utilized for silt fence construction, shall have a minimum weight of 1.33 pounds per linear foot and a minimum length of 5 feet.

Identification Storage and Handling

– Filter fabric shall be identified, stored and handled in accordance with ASTM D 4873.

Maintenance

– The Contractor shall maintain the temporary and permanent vegetation, erosion and sediment control measures, and other protective measures in good and effective operating condition by performing routine inspections to determine condition and effectiveness, by restoration of destroyed vegetative cover, and by repair of erosion and sediment control measures and other protective measures. The following procedures shall be followed to maintain the protective measures.

– Silt fences shall be inspected in accordance with the below paragraph, Inspections. Any required repairs shall be made promptly. Close attention shall be paid to the repair of damaged silt fence resulting from end runs and undercutting. Should the fabric on a silt fence decompose or become ineffective, and the barrier is still necessary, the fabric shall be replaced promptly. Sediment deposits shall be removed when deposits reach one-third of the height of the barrier. When a silt fence is no longer required, it shall be removed with approval of COR. The immediate area occupied by the fence and any sediment deposits shall be shaped to an acceptable grade.

– Diversion dikes shall be inspected in accordance with the below paragraph, Inspections. Close attention shall be paid to the repair of damaged diversion dikes and necessary repairs shall be

accomplished promptly. When diversion dikes are no longer required, they shall be shaped to an acceptable grade.

Inspections

- The Contractor shall inspect disturbed areas of the construction site, areas used for storage of materials that are exposed to precipitation that have not been finally stabilized, stabilization practices, structural practices, other controls, and area where vehicles exit the site at least once every 7 calendar days and within 24 hours of the end of any storm that produces 0.5 inches or more rainfall at the site. Where sites have been finally stabilized, such inspection shall be conducted at least once every month.

- Disturbed areas and areas used for material storage that are exposed to precipitation shall be inspected for evidence of, or the potential for, pollutants entering the drainage system. Erosion and sediment control measures identified in the Storm Water Pollution Prevention Plan shall be observed to ensure that they are operating correctly. Discharge locations or points shall be inspected to ascertain whether erosion control measures are effective in preventing significant impacts to receiving waters. Locations where vehicles exit the site shall be inspected for evidence of offsite sediment tracking.

- For each inspection conducted, the Contractor shall prepare a report summarizing the scope of the inspection, name(s) and qualifications of personnel making the inspection, the date(s) of the inspection, major observations relating to the implementation of the Storm Water Pollution Prevention Plan, maintenance performed, and actions taken. The report shall be furnished to the COR within 24 hours of the inspection as a part of the Contractor's daily CQC Report. A copy of the inspection report shall be maintained on the job site.

Wetlands

- **MM-VEG-4.** Delineate wetlands and apply protection measures during construction. Wetlands shall be delineated by qualified National Park Service staff or certified wetland specialists and clearly marked prior to work. Perform activities in a cautious manner to prevent damage caused by equipment, erosion, siltation, etc.

- **MM-VEG-5**. The Contractor shall adhere at all times to the conditions of U.S. Army Corps of Engineers Nationwide Permit No. 33, Temporary Construction, Access and Dewatering, with the following conditions as a minimum:

  - All work will be subject to the Standard and Technical Conditions of the Certification of the California Regional Water Quality Control Board, a copy which will be provided to the Contractor.

  - Work in streambeds is to be performed in periods of low water conditions. Contractor shall monitor stream flow conditions and weather forecasts at all times during the course of the work. During thunderstorms or other intense rain conditions, streambeds at Yosemite can fill rapidly.

  - Re-grade and restore disturbed areas to preexisting contours to maintain drainage patterns.

- **MM-VEG-6.** The Contractor shall fence construction areas adjacent to aquatic habitats to prohibit the movement of aquatic species into the construction area and to control siltation and disturbance in aquatic habitats.

  - The Contractor shall salvage and reuse wetland soils as fill to the maximum extent possible.

  - The Contractor shall use trench plugs where designated on the drawings in wetland areas to prevent changes to natural flow patterns.

- During dewatering, intakes shall be completely screened with wire mesh not larger than 5 millimeters to prevent aquatic species from entering the pump system. Water shall be released or pumped downstream at an appropriate rate to maintain downstream flows during construction.
- Access routes to and through work locations in the meadows and wetlands shall be planked with 1 1/8" plywood, stabilization mats or other method approved by the contracting officer.

Refer to Appendix C of the *Merced River Plan/ FEIS* for a complete list of resource-specific mitigation measures applicable to the final preferred alternative. The final preferred alternative has been designed to mitigate harmful effects to wetlands. The Merced River Plan/FEIS includes programmatic actions that will require preparation of a subsequent statement of findings for specific projects.

Site Restoration

Restoration of riverine habitat functions and values is an integral part of the preferred alternative in Segments 1-8 of the Merced River corridor. Restoration of 37.98 acres of wetland habitat would improve palustrine habitat functions and values in Segments 2 and 4. Additional restoration activities that are incorporated into the preferred alternative are described above, under the subheading *Environmental Consequences of the Final Preferred Alternative on Wetlands*.

Proposed Compensation

The emphasis of the Merced River Plan is to avoid and minimize impacts to wetland resources. Approximately 2.67 acres of wetlands would be impacted by Alternative 5, including 1.26 acres of palustrine emergent wetlands, 0.96 acres of palustrine forested wetlands, 0.44 acres of riverine intermittent wetlands, and 0.01 acres of riverine perennial wetlands. Compensation will be required for the direct impact to 2.67 acres of wetlands at Curry Village, Camp 6 and Yosemite Village, and Yosemite Lodge and Camp 4. The wetland features that would be affected by the proposed activities provide important natural functions such as nutrient cycling, sediment entrapment, and habitat for wildlife. Because this project must ensure "no net loss" of wetland functions or values, compensation of a minimum of 2.67 acres of wetland would be required.

The NPS will provide compensation through the restoration of approximately 37.75 acres of wetlands in Segment 2 (see Figures 9-29 through 9-32 in Chapter 9). Figures O-9 through O-12 display the locations of proposed actions to restore and enhance wetland habitats in areas near where wetland impacts will occur. These restoration actions will provide compensation for the wetland losses described above, resulting in a 15:1 habitat compensation ratio. Restored wetland types include palustrine forested wetland and palustrine emergent wetland. Restored areas will provide equivalent, if not higher, wetland functions and values to those features impacted by the project. In general, in-kind mitigation is preferable to out-of-kind mitigation because it is most likely to compensate for the functions and values lost at the impact site. However, in the case of the impacted riverine wetlands (where the impacts are much less than those to the palustrine wetlands), this habitat type is already abundant in the region and a priority was placed on creating additional palustrine emergent and forested wetlands, as this habitat type would adequately compensate for the lost functions and values of the riverine wetlands.

CONCLUSION

The final preferred alternative would have a beneficial impact on the extent, function, and value of wetlands by implementing restoration management actions for the Merced River corridor. These management actions would include the removal of abandoned infrastructure, restoration of eroded and vulnerable riverbanks, protection of the riparian zone within 150' of the ordinary high-water mark, removal of campsites within 100' of the ordinary high-water mark, removal and replacement of riprap, and the rerouting of trails from sensitive habitat, including wetlands. The removal of fill from wetland and riparian areas would result in the net creation of wetlands within Segments 2 and 4. The net result of these actions would be improved hydrologic function and the restoration of ecological integrity of the Merced River, including associated plant communities and wetlands.

Approximately 2.67 acres of wetlands will be impacted by implementation of Alternative 5, including 1.26 acres of palustrine emergent wetlands, 0.96 acres of palustrine forested wetlands, 0.44 acres of riverine intermittent wetlands, and 0.01 acres of riverine perennial wetlands. The NPS will provide compensation through the restoration of approximately 37.75 acres of wetlands in Segment 2.

The National Park Service has determined that there is no practicable alternative that could be located outside the floodplain or wetland habitat. Mitigation and compliance with regulations and policies to prevent impacts to water quality, wetland function and values, and loss of property or human life would be strictly adhered to during and after construction.

Subsequent project-level documentation may be required for future development projects. Individual permits with other federal and cooperating state and local agencies will be obtained or updated as appropriate prior to any development activities. Therefore, the National Park Service finds the final preferred alternative to be acceptable under Executive Order 11990 for the protection of wetlands.

Recommended:

Superintendent, Yosemite National Park Date

Certification of Technical Adequacy and Servicewide Consistency:

Chief Water Resources Division Date
or Professional Wetland Scientist, National Park Service

Approved:

Regional Director Pacific West Region, National Park Service Date

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APPENDIX P

PUBLIC CONCERNS AND RESPONSES REPORT

1.0 INTRODUCTION

Collaboration with private citizens, park visitors, gateway communities, traditionally associated tribal groups, partners in other agencies, national and local advocacy groups, scientists and scholars, and elected officials was an integral part of the agency and public involvement process used to develop the *Merced Wild and Scenic River Comprehensive Management Plan /Draft Environmental Impact Statement* (*Merced River Plan/DEIS*). This *Public Concerns and Response Report* is a summary of the voices heard during the 112-day public comment period on the *Merced River Plan / DEIS*. All written comments were considered during the preparation of this *Merced Wild and Scenic River Final Comprehensive Management Plan / Environmental Impact Statement (Merced River Plan / EIS)* in accordance with the Council on Environmental Quality's (CEQ) regulations for implementing the National Environmental Policy Act (40 CFR 1503-1506). This report also provides the National Park Service (NPS) responses to substantive comments.

All federal agencies are required to comply with the National Environmental Policy Act (NEPA) when considering actions that could affect the quality of the human environment. The CEQ regulations for implementing NEPA (40 CFR 1506) require agencies to involve the public in preparing and implementing NEPA procedures. As the lead federal agency under NEPA, the National Park Service was responsible for providing a period of public comment of at least 45 days on the *Merced River Plan / DEIS*. The *Merced River Plan / DEIS* was released for public review on January 8, 2013, and the National Park Service accepted comments through April 30, 2013. Public comments were received by fax, U.S. mail, and online through email and the Planning, Environment, and Public Comment (PEPC) website.

During the comment period, 29,404 individual pieces of correspondence (e.g., entire letters, emails, faxes) were received. From these correspondences, analysts summarized a total of 624 unique statements of concern. This report lists these concern statements, representative quotes that support these statements, and the NPS responses to the substantive issues captured in these statements. This report also describes the comment analysis methodology, including the analysis of individual comments and the development of concern statements.

2.0 ANALYSIS METHODOLOGY

The letters, emails, faxes, and public meeting comments represented in this *Public Concerns and Response Report* were analyzed using the Planning, Environment, and Public Comment (PEPC) database, which was developed by the NPS and is used servicewide.

Correspondence received during the comment period was analyzed in a series of stages. Staff read each piece of correspondence to identify discrete points expressed by the author, each of which is considered to be a "comment." Each comment was assigned a code in order to associate that comment with a particular resource topic, or element of the plan (such as cultural resources or camping). Staff derived code categories from an analysis of the range of topics covered in relevant present and past planning documents, National Park Service legal guidance, and the contents of the correspondence. The coding structure enabled comment organization by topic area. Comments that discussed multiple issues (e.g. commercial operations and transportation) were assigned multiple codes. Once coded, individual comments were assigned subcategories to capture specific concerns and issues.

Table P-1 identifies the highest level coding structure, which captures key topics. The final coding structure included the 11 codes described in Table P-1, along with subcategory codes.

TABLE P-1: MERCED WILD AND SCENIC RIVER COMPREHENSIVE MANAGEMENT PLAN CODING STRUCTURE

Code	Code Description
MRP1000	Purpose and Need
MRP2000	Transportation
MRP3000	Commercial Operations
MRP4000	Park Management
MRP5000	User Capacity/Visitor Use Management System
MRP6000	Partnerships/Collaborations
MRP7000	NEPA
MRP8000	Resources
MRP9000	Visitor Use
MRP10000	Visitor Facilities
MRP11000	Other Comments

The coded comments are stored in a database where they can be quickly accessed using a variety of query and reporting tools.

Comments were reviewed as "in-scope" or "out-of-scope," as well as "substantive" and "non-substantive." In-scope comments were those that addressed the structure and findings of the *Merced River Plan / DEIS,* while out-of-scope comments included those comments addressing issues unrelated to the *Merced River Plan / DEIS* or the requirements of a wild and scenic river comprehensive management plan (such as park operational details). Substantive comments are those comments that:

- question, with reasonable basis, the accuracy of the information in the *DEIS*
- question, with reasonable basis, the accuracy of the environmental analysis
- develop and evaluate reasonable alternatives other than those presented in the *DEIS*

- cause changes to the proposal or alternatives
- suggest factual corrections

Consistent with CEQ guidelines and NPS Management Policy, comments in favor of or against the proposed action or alternatives, or comments that only agree or disagree with NPS policy, are not considered substantive.

Similar substantive comments were grouped together to develop a unique "concern statement". The concern statement summarizes the main points or common themes expressed across one or more substantive comments. Such statements are derived from and supported by quotes from original correspondence. Each statement is worded to give decision-makers a clear sense of what action is being requested. Public concern statements are also intended to help guide the reader to comments on specific topics of interest. They do not replace the actual comments received from individuals. Rather, concern statements should be considered as one means of accessing information contained in original correspondence and the coded comment database.

The concern statements were framed to express the action requested of the NPS. The concern statements were then screened to determine whether the statement involved a request for further clarification or modification of the proposed action. In the latter case, concerns were brought to park management for further deliberation. As a result of this deliberation, modifications were made to the alternatives considered, to the evaluation of impacts, and in particular, to the content of the preferred alternative (see Table 7: Major Changes to the Plan as a Result of Public Comment, below).

Substantive comments guided the development of concern statements and subsequent changes to this *Merced River Plan / FEIS*. The NPS responses to concern statements detail these changes. Other responses point to sections of the *Merced River Plan / FEIS* for further information or clarification. Some responses provide background or relevant information in park policy that addresses the substance of the comment, but do not contain references to document revisions. Other responses explain why comments were considered, but ultimately dismissed from further analysis. No responses were generated for non-substantive comments (such as personal opinion) or comments that misrepresented the proposed action.

All comments received during the public comment period were considered and are now part of the administrative record for this plan. Comment letters can be viewed on the park's web site at: http://www.nps.gov/yose/parkmgmt/mrp.htm.

3.0 ANALYSIS RESULTS

Number of Correspondences

The *Merced River Plan/DEIS* was released for public review on January 8, 2013. The National Park Service accepted comments on the document for 112 days, through April 30, 2013. Public comments were received by fax, U.S. mail, online via email, and through the Planning, Environment, and Public Comment (PEPC) website. During the comment period, 29,404 individual pieces of correspondence were received. Table P-2 describes the distribution of correspondence by type (email, web form, letter, etc).

TABLE P-2: CORRESPONDENCE DISTRIBUTION BY CORRESPONDENCE TYPE

Type	# of Correspondences
E-mail	25983
Web Form	3133
Other	129
Letter	126
Fax	25
Petition	5
Park Form	2
Total	**29,404**

Table P-3 summarizes the distribution of the letters between individuals, organizations, agencies, and tribal partners.

TABLE P-3: DISTRIBUTION OF MRP PUBLIC COMMENT CORRESPONDENCES

Organization Type	# of Correspondences
Business	8
Civic Groups	8
Conservation/Preservation	1
County Government	3
Non-Governmental	1
Non-NPS Employee in the Park	3
Federal Government	1
Recreational Groups	2
Town or City Government	1
Tribal Government	2
Individuals[a]	3887
Unidentified[b]	25,487
Total	**29,404**

NOTES:
[a] Individual correspondences may have included multiple signatures.
[b] Unidentified correspondences may include other organization types not self-reported by commenters.

Table P-4 describes the distribution of correspondence by form type, including forms, master forms, potential forms (e.g., individual letters based on form letter templates), and individual correspondence.

TABLE P-4: DISTRIBUTION OF MRP PUBLIC COMMENT CORRESPONDENCE FORM TYPE

Organization Type	# of Signatures
Individual Correspondence	4102
Master Form Correspondence	9
Potential Form Correspondence	1099
Form Correspondence	24194
Total	**29404**

Number of Substantive Comments

During the course of public comment analysis, staff identified 12,574 substantive comments related to the 117 codes. As previously noted, some comments received multiple codes in order to comprehensively capture the issues identified in the comment. Table P-5 provides a summary of the distribution of substantive comments amongst the 11 primary codes.

TABLE P-5: COMMENT TOTAL PER CODE

Code	Code Description	# of Substantive Comments
MRP1000	Purpose and Need	754
MRP2000	Transportation	1,517
MRP3000	Commercial Operations	5,051
MRP4000	Park Management	662
MRP5000	User Capacity/Visitor Use Management System	227
MRP6000	Partnerships/Collaborations	20
MRP7000	NEPA	587
MRP8000	Resources	752
MRP9000	Visitor Use	1,409
MRP10000	Visitor Facilities	1209
MRP11000	Other Comments	27

Number of Concern Statements

From the 12,574 substantive comments, staff identified 624concern statements, detailed in the ***Comments and Responses*** section below. Table P-6 provides a summary of the distribution of concern statements amongst the 11 primary codes.

TABLE P-6: CONCERN STATEMENT TOTAL BY CODE

Code	Code Description	# of Concern Statements
MRP1000	Purpose and Need	66
MRP2000	Transportation	89
MRP3000	Commercial Operations	134
MRP4000	Park Management	52
MRP5000	User Capacity/Visitor Use Management System	24
MRP6000	Partnerships/Collaborations	2

TABLE P-6: CONCERN STATEMENT TOTAL BY CODE

Code	Code Description	# of Concern Statements
MRP7000	NEPA	37
MRP8000	Resources	100
MRP9000	Visitor Use	45
MRP10000	Visitor Facilities	54
MRP11000	Other Comments	19

Table P-7 provides a summary of the major changes NPS made to Alternative 5 (Preferred) as a result of public comment and collaboration with agency and tribal partners. A detailed breakdown of the NPS responses to public concerns is included as Part 5 of this report.

TABLE P-7: CHANGES BETWEEN DEIS AND FEIS

Segment	Action	Draft Preferred Alternative	Final Preferred Alternative
All	Total Restoration Acres	Ecologically restore 203 acres	Ecologically restore 189 acres
1	Merced Lake Meadow Grazing	No grazing capacity set	Establish grazing capacity of up to 58 stock-nights per season
1	Merced Lake High Sierra Camp Pack-stock Support	No limits identified	Establish a limit of 7.5 pack-strings per week for an average of 30 pack-strings per month for camp operations
1	Merced Lake High Sierra Camp Lodging	Remove 11 historic tents	Remove 11 tents and retain historic foundations
2A & 2B	User Capacity Management Program – Yosemite Valley	Limit user capacity to 18,150 people at one time, with an estimated daily visitation of 19,900 people	Implement the El Capitan Traffic Diversion to limit user capacity to18,710 people-at-one time, with an estimated daily visitation of 20,100 people
2A & 2B	Eagle Creek Campground (West Valley)	Construct 42 new campsites at Eagle Creek in West Valley	No new campgrounds proposed for West Valley
2A & 2B	Upper and Lower River Campgrounds	Provide 30 campsites at the site of the former Lower River Campground in East Valley	Provide 72 campsites at the site of the former Upper and Lower River Campgrounds in East Valley
2A & 2B	Private Boating	Allowed between Lower River and Sentinel Beach	Additional reaches open to private boating
2A	Commercial Rafting	No commercial rafting allowed	Commercial rafting allowed (50 boats at one time)
2A	Commercial Bike Rentals (Curry Village/Yosemite Lodge)	Remove commercial bike rentals	Move Curry Village and Yosemite Lodge bike rentals to locations outside the river corridor
2A	Commercial Raft Rentals in Yosemite Valley	Eliminate commercial raft rentals	Move raft rentals to a location outside the river corridor and limit operation to 100 boats per day
2A	Curry Ice Rink (CTA)	Remove Curry Ice Rink	Convert Curry Village Ice Rink to a temporary facility and locate it outside the river corridor in the Curry Village parking lot
2A	Historic Sugar Pine Bridge	Remove Sugar Pine Bridge	Retain Sugar Pine Bridge; conduct further hydrologic impact study to assess the merits of various long-term bridge management strategies
2A	Superintendent's House (Residence 1) & Garage	Move Superintendent's House and Garage to a location outside the river corridor	Remove Superintendent's House and Garage
2A	Swimming Pools	Remove swimming pools at the Ahwahnee and Yosemite Lodge	Retain all swimming pools

TABLE P-7: CHANGES BETWEEN DEIS AND FEIS

Segment	Action	Draft Preferred Alternative	Final Preferred Alternative
2A	Yosemite Lodge Pedestrian Underpass	Construct a pedestrian underpass west of the intersection of Northside Drive and Yosemite Lodge Road	Explore options for a grade-separated pedestrian crossing at Yosemite Lodge, with the final design be determined with tiered NEPA/NHPA compliance
2A	Yosemite Lodge Bus Loading & Unloading/Parking	Provide bus loading and parking area in area currently occupied by Highland Court; include 15 bus parking spaces in West of Lodge Parking Area	Provide bus loading and unloading parking area south of Lodge Registration Building and 22 bus parking spaces in West of Lodge Parking Area
2A	Boys Town Guest Accommodations	Remove all historic canvas tents and non-historic without-bath-cabins; construct 98 new hard-sided cabin-with-bath units	Retain 50 historic canvas tents and 14 non-historic hard-sided without-bath-cabins; construct 52 new hard-sided cabin-with-bath units
2A	Curry Village Lodging Totals	Retain 453 lodging units	Retain 482 lodging units
2A	Huff House (West Curry Village Day-use Parking Area)	Provide 103 parking spaces	Provide189 parking spaces
2A	Yosemite Village Day-use Parking Area	Provide 850 parking spaces in an eight-acre area	Provide 750 parking spaces in a seven-acre area
2A	Concessioner General Office Relocation	Provide a total of 10,000 square feet of office space in the Concessioner Warehouse	Provide a total of 15,000 square feet of office space by expanding the Concessioner Warehouse
2A	Housekeeping Camp Store	Remove store	Retain store
2A	Huff House (Curry Village) Employee Housing	Remove temporary employee housing and construct permanent housing for 164 employees	Retain the historic Huff House and 10 tent cabins (20 beds)
2A	Lost Arrow Temporary Employee Housing (outside river corridor)	Remove temporary housing and construct permanent housing for 50 employees	Remove temporary housing and construct permanent housing for 87 employees
2B	West Valley Overflow Parking Area	Provide parking for 100 cars in new overflow parking area in West Valley	No new parking proposed for West Valley
3	Transit and Shuttles	El Portal Remote Parking Area assumed to be served by existing Highway 140 transit operations	El Portal Remote Parking Area serviced by shuttle to Yosemite Valley (seasonally available)
3	El Portal Employee Housing	Construct housing in Rancheria and Old El Portal to replace 96 beds removed from Yosemite Valley	Construct housing in Rancheria and Old El Portal to replace 160 beds removed from Yosemite Valley
3	Abbieville/Trailer Village	Establish 200-car parking lot in El Portal for Yosemite Valley day users	Establish 300-car parking lot in El Portal for Yosemite Valley day users and provide 40 campsites for public/administrative use in Trailer Village

4.0 USING THIS REPORT

This report presents concern statements arranged by topic along with a representative sample of supporting quotes. The following text presents public concerns identified during the comment analysis process, organized topically into six sections: Legal Framework and Planning Process, River Values and Resources, User Capacity and Visitor Use Management, Park Administration, and Alternatives and Management Actions. An errata sheet with a list of technical corrections and clarifications is included at the end of this report.

Each formal statement of public concern is accompanied by one or more representative quotes that provide respondents' specific perspectives and rationales regarding that concern. For each representative quote, the correspondence ID number is provided, enabling the reader to track and review the original comment

letter, if desired. This report is intended to capture the full range of concerns regarding this project. Its primary purpose is to provide an organized review of a large number of comments in a format that aids careful consideration and agency response. In addition to reviewing this report, staff separately reviewed the original correspondences, and queried the PEPC database on specific topic issues when deliberating potential changes to the preferred alternative. In preparing this *Merced River Plan / FEIS*, the NPS has assessed and considered comments both individually and collectively, and has responded to all substantive public and agency comment on the *Merced River Plan / DEIS*.

The following list of acronyms has been developed to maintain brevity and should assist the reader in reviewing the report.

List of Acronyms

CMP	(Merced River) Comprehensive Management Plan
DEIS	Draft Environmental Impact Statement
FEIS	Final Environmental Impact Statement
GMP	General Management Plan
HSCs	High Sierra Camps
MRP	Merced River Plan
NEPA	National Environmental Policy Act
NPS	National Park Service
ORV	Outstandingly Remarkable Value
PEPC	Planning, Environment, and Public Comment
ROD	Record of Decision
TRP	Tuolumne River Plan
USFS	United States Forest Service
VERP	Visitor Experience and Resource Protection
WSRA	Wild and Scenic Rivers Act
YNP, Yosemite, or park	Yosemite National Park

5.0 SUBSTANTIVE COMMENTS BY ISSUE AREA

Legal Framework and Planning Process

Purpose and Need

Concern 1: The NPS plan should place additional focus on the reduction of the human footprint and restoration of Yosemite Valley to its natural state.

> *We have the most wonderfully encapsulated attraction on the planet in Yosemite Valley. Having experienced the sublimity of the Grand Canyon and the intoxicating silence of Death Valley I appeal to larger hearts and minds to censure any plan that does not move us in the direction of restoring Yosemite Valley to its natural state free of the clutter and clatter of civilization.*
>
> (Individual; Correspondence #19)
>
> *This DEIS must not lose sight of that goal of protecting the one of kind biological resources first and foremost. And especially the Park Service should not allow these resources to be threatened with construction, excessive tourism, and human activities that can be enjoyed in other places - like a golf course, driving one's car, and excessive concessionaires.*
>
> (Individual; Correspondence #1758)
>
> *I am very concerned about the continual commercialization of Yosemite National Park. I consider it a national treasure. Over the years I have been in California, I have seen the degredation of natural resources, overcrowding, excess traffic and political pressure to continue expanding. I consider this a backward step in preserving Yosemite for the future generations. The quality of the natural beauty of the park must be preserved through smart management.*
>
> (Individual; Correspondence #3202)

Response: The range of alternatives presented in the Draft Merced River Plan / EIS all propose a substantial amount of restoration within Yosemite Valley. The draft Alternative 5 (Preferred) proposed to restore 189 acres to natural conditions through actions such as pulling development away from the river's edge, restoring wetland, riparian, and oak woodland habitat and increasing river channel complexity. Alternatives 2–5 each address the consolidation and or reduction of the human footprint in Yosemite Valley to accomplish a more efficient use of the limited land available. Actions common to Alternatives 2–6 are specifically designed to restore previous impacts from humans and the history of development within the river corridor.

Concern 2: The NPS should narrow the scope of the plan and present the document in a format that is more easily comprehended because the large size of the current plan makes it unwieldy.

> *While it appears that A LOT of planning has been done, I believe the size / scope of this project could interfere with the objectives within. Let's face it, there are 750 pages of information about this project and the cost of most of the options are somewhere around a quarter of a billion dollars. Voting on a scope so large can also mean that important details are lost in the decision-making process up front. If decisions / votes are made in smaller chunks, you provide more opportunities for the public and decision makers not to lose site of these details that can otherwise be overlooked*
>
> (Individual; Correspondence #950)
>
> *Approve only minor restoration projects (i.e., meadows; replace, recapture, and add dispersed day-use parking spaces; implement and enforce common sense transportation strategies; and provide fast,*

friendly, coordinated shuttle service compatible with work schedules for out-of-Valley employees (NPS & DNC), starting with the El Portal lot).

(Individual; Correspondence #2015)

The most recently proposed changes are of too great a magnitude, excessive expense, and the installation time much too short.

(Individual; Correspondence #3070)

Response: The NPS has made every attempt to streamline and summarize the content of the Draft Merced River Plan / EIS and improve the readability of this document. However, both the size and complexity of the Draft Merced River Plan / EIS are necessary to address the requirements of the Wild and Scenic Rivers Act, most notably the requirements to address the protection and enhancement of river values, establish user capacities, and assess major public use facilities. The National Environmental Policy Act requires agencies to develop and evaluate a range of reasonable and feasible alternatives. The majority of the content in the draft plan is attributed to "Affected Environment and Environmental Consequences" (Chapter 9) which analyzes the impacts of six alternatives (including the No Action) for more than 20 impact topics.

Concern 3: The NPS should consider plan actions based on whether or not the action is "appropriate" within the river corridor, rather than "necessary."

The "Decision Tree" on page 8-5 of the DEIS basically indicates 2 questions were used to determine whether a facility/service should/should not remain in the River corridor... However, it seems the primary overarching question was avoided: whether a facility or service is "river related" AND is "rare, unique, or exemplary in a regional or national context" and furthermore, whether it "protects or enhances the river's unique values." It would seem the answer to THAT question needs to be determined FIRST with respect to facilities and services within the Merced River corridor before moving on to the specific question of whether the "facility or service is necessary for public use under an alternative" and then whether it is "feasible to relocate the facility or service outside the Merced River corridor."

(Individual; Correspondence #1617)

The plan is based on what activities are "necessary" (see Appendix L Determination of Extent Necessary) within the river corridor (1/4mile north and south of the river). Very little is "necessary" anywhere. Using this metric allows the planners to limit and/or prohibit most recreational activities. A better approach to building the plan would be to determine if something is "appropriate" for supporting recreational activities that have little to no impact on the wild and scenic "values" of the river.

(Individual; Correspondence #1710)

I am also concerned that some of the plan statements seem subjective in nature, especially when defining a park activity or site as "not a vital park experience". This depends on the opinion of each individual, and since this is a National Park, it is visited by a wide variety of people from all over this nation and the world who have many different views on what they view as a vital park experience.

(Individual; Correspondence #2773)

Response: Appendix L, the Determination of Extent Necessary, was prepared to address a provision of the Wilderness Act that requires agencies to determine the extent to which commercial services are necessary in designated wilderness. Because portions of the Merced Wild and Scenic River corridor are in designated wilderness, the NPS was required to coordinate the Wilderness Act's "necessity" finding with this Comprehensive River Management Plan. Appendix L fulfills this requirement by determining which commercial services are necessary and the extent to which they should be allowed in the wilderness portions of the river corridor. Appendix L only addresses commercial services. The "necessity" findings in Appendix L do not apply to non-commercial recreational activities.

The criteria "river related" and "rare, unique and exemplary" are used to identify Outstandingly Remarkable Values. These criteria, which derive from guidance issued by the Interagency Wild and Scenic Rivers Council in 1999, do not apply to facilities. Under the 1982 Guidelines, river managing agencies must determine whether major facilities in the river corridor are "necessary" for public use or protection of river resources. A discussion of the Guidelines' criteria related to facilities in the river corridor is found in "Development of Lands and Facilities" (Chapter 7). The NPS did not adopt a rigid definition of the word "necessary" in evaluating facilities.

Concern 4: The NPS should give less emphasis to 'footnote 5' in determining the analysis of services and facilities in the Merced River corridor.

> *National Park Service places great emphasis on footnote 5 contained in Friends of Yosemite v. Kempthorne. In footnote 5 the Court provides a list of activities and situations which in total "illustrate the level of degradation already experienced in the Merced". It would appear that NPS is using this footnote as the sole rationale to effect many proposed changes regardless of any rational basis for doing so*
>
> (Individual; Correspondence #2602)
>
> *We understand the difficult task the Park Service faces in trying to balance protection of the river and providing recreational opportunities. We are aware that court documents have referenced in "footnote five" that the Park Service is asked to make a conscious choice with regard to which commercial activites should be allowed. Fear of further legal action should not supersede what is best for the visitor experience and our regional tourism economy.*
>
> (Civic Group; Correspondence #3116)

Response: Footnote 5 from the Ninth Circuit Court of Appeals 2008 opinion in Friends of Yosemite Valley v. Kempthorne was not the sole driver for decisions made in this plan. The proposed changes embodied in Alternatives 2 through 6 were guided by many legal authorities. The primary legal authority that guided the development of this plan was the Wild and Scenic Rivers Act. Other sources of legal authority that informed the choices presented in this plan include the Secretarial Guidelines interpreting the Wild and Scenic Rivers Act, the opinions issued by the U.S. Court of Appeals for the Ninth Circuit on prior versions of the Merced River Plan, the Settlement Agreement that resolved the litigation over the plan, and guidance materials issued by the Interagency Wild and Scenic Rivers Coordinating Council.

Concern 5: The NPS should consider a plan with a more balanced approach to managing the visitor experience and preserving natural resources.

> *Merced River Plan needs to include encouraged human recreational activities within the Yosemite Park boundaries.*
>
> *John Muir would have encouraged retaining the family activities in and along the river to embrace the American family and to educate the next generation on the beauty of nature along with the ecological responsibilities required to maintain the Yosemite valley and the Merced River. What better place to learn and do that than in the Yosemite valley. There needs to be a better human use balance to do that!*
>
> (Individual; Correspondence #246)
>
> *I believe the curren usage plan of Yosemite Valley represents a good balance between access and enjoyment of the public and preserving the natural setting of the park. I would not alter the current usage plan significantly.*
>
> (Individual; Correspondence #354)
>
> *i understand the importance of conservation and appreciate what has been accomplished over the past years. However, we need to remember that the parks are here for our enjoyment, also; and that a*

happy compromise between environmental concerns and the enjoyment of the public, which owns these parks, needs to be met with common sense.
(Individual; Correspondence #1079)

We do believe that providing families with varied activities is a healthy approach to managing the valley while providing visitors a complete vacation experience, so long as those activities do not do measurable harm to the valley and to the Merced river system.

(Individual; Correspondence #1117)

We understand the great challenge of maintaining a balance between managing the visitor experience and preserving the natural resources of the Merced River and Yosemite Valley. However, we feel STRONGLY that none of the Alternatives meet that challenge, so it is probably best to follow Alternative 1 (do nothing) at this time until better alternatives are presented.

(Individual; Correspondence #1750)

Response: Under Section 10 of the WSRA, the NPS must administer the Merced Wild and Scenic River corridor to protect and enhance the river's ORVs. This includes the river's Recreational ORVs. Our response to Concern Number 51 identifies the many visitor activities that are included within the Recreational ORV for Yosemite Valley and are therefore protected. Segment 1 also has a designated Recreational ORV. The activities that encompass that ORV are described in "River Values and their Management" (Chapter 5). Provided that ORVs are protected, the WSRA allows other types of public uses of the river corridor as long as those uses do not substantially interfere with public use and enjoyment of the ORVs. Other public uses of the Yosemite Valley segment of the corridor that would be allowed to varying degrees under Alternatives 2 through 6 but that are not part of the Recreational ORV are activities such as shopping or eating in a restaurant. To the extent that balancing implies that these other uses are equal in importance to ORV protection, this is an incorrect understanding of WSRA.

Concern 6: The NPS should retain services and facilities to maintain existing visitor experiences in Yosemite Valley.

Why eliminate so many activities that are widely enjoyed by many people? If we concede that part of the park to tourism we can concentrate on maintaining the rest of the park in as natural a state as possible. The majority of people who visit Yosemite never leave the valley floor. Giving them a positive experience helps to promote the park in general.

(Individual; Correspondence #1101)

The obsession with restoring the valley to some pristine state is counter productive to the interests of visitors. The removal of several popular valley amenities will result in yet larger declines in attendance and undermine the benefits of having a populous that enjoys visiting the park but isn't interested in backpacking or roughing it.

(Individual; Correspondence #1261)

Please continue with the present system. Do not use alternative 5 or any of the other new proposals. The proposals are modifying the margins of the Yosemite experience, but do not create a significant change in the valley ecosystem.

(Individual; Correspondence #1414)

Response: Comment noted.

Concern 7: The NPS should not implement the proposed changes in the Plan because these changes would negatively impact visitor access to Yosemite National Park, which was historically intended for public use.

> *I am in strong opposition to the Merced River Plan as it affects Yosemite National Park. The adverse affect on Yosemite includes visitor access to the Park. The National Parks have historically been set aside, in part, to allow for access by the public in order to enjoy the beauty and tranquility they offer. The adverse effects that this plan has on Yosemite, the surrounding communities, and the large number of visitors who come to enjoy the Park, cannot be ignored.*
>
> (Individual; Correspondence #3108)
>
> *I am writing to express my strong opposition to the proposed changes included in the "Draft comprehensive management plan and environmental impact report" known as the Merced river plan. This plan adversely impacts visitor access to the park and the closure of many historic amenities including the destruction of the Sugar pine bridge.*
>
> (Individual; Correspondence #3177)
>
> *I am objecting to the changes within the Yosemite National Park and the Merced River. Making these changes takes away the ability for the public to enjoy and appreciate what is available. When the area was determined to be a national park protecting its beauty, it wasnt' just to maintain its beauty but for the public to enjoy it. Make the changes and take away its original intention. The changes will inhibit visitors from coming and from locals continuing use. Please vote NO CHANGES!*
>
> (Individual; Correspondence #3504)
>
> *The proposed plan contradicts the 1864 act that authorized the park. The original act says that the Park shall be held for public use, recreation and resort and shall be inalienable for all time... By limiting use and removing facilities that are far away from the river; this plan breaks the original act of 1864. By limiting use and removing facilities that are far away from the river, the current Draft Merced River Comprehensive Management Plan does not "conform to the fundamental purpose of the said park".*
>
> (Individual; Correspondence #7824)

Response: The NPS final Alternative 5 (Preferred) will maintain the public's ability to access the park. However, the NPS must identify a numeric limit on use that ensures protection of the river resource in accordance with the Wild and Scenic Rivers Act. Numerous changes proposed in the plan are intended to provide for a better visitor experience, one that addresses congestion and crowding on roadways in a very direct way, and provides for the protection and enhancement of the Merced River's outstandingly remarkable values. Where feasible, some facilities would be relocated outside the river corridor in order to reduce the development footprint in the river corridor.

Concern 8: The NPS should focus on improving Park management and enhancing existing visitor facilities instead of allocating funding to implement the river plan.

> *Instead of spending an estimated 235 million dollars destroying and eliminating existing facilities (historic bridges, swimming pools, bicycle rental facilities, horse back riding facilities, raft rentals, ice rink winter facility, retail and snack stands, roads and the apple orchard (parking lot) concentrate on enhancing visitor sites outside the valley proper to better disburse the visiting populous. To eliminate the tennis courts and golf course at the Historic Wawona Hotel we have enjoyed for many years is counter productive to the efforts to encourage visitors to enjoy themselves away from the Yosemite valley floor.*
>
> (Individual; Correspondence #3070)
>
> *It is our opinion that Alternative 1 (No-Action; baseline conditions) should continue until a better plan can be drafted which will improve the Park instead of reducing and eliminating recreational opportunities for the American public. There are many ways in the existing plan in which to continue to*

improve the Park and manage and protect the infrastructure, resources and visitor experience to Yosemite National Park and the Merced River corridor.

(Non-Governmental; Correspondence #3112)

Response: This concept is essentially evaluated in the DEIS as Alternative 1(No Action). In addition to protecting and enhancing river values, the Merced River Plan includes actions that are intended to improve park management and enhance existing visitor facilities in the river corridor. The Merced Wild and Scenic River Comprehensive Management Plan is required by law, an obligation that was reinforced by court order.

Concern 9: The NPS should revise the plan to better address the impacts of congestion and crowding in the Valley.

I oppose the plan as currently written. It will do little or nothing to alleviate congestion within the Valley and will actually destroy large sections of currently natural landscapes.

(Individual; Correspondence #3261)

There are problems to be resolved within Yosemite, but this plan addresses none of them. In fact, every alternative except alternative one would make Yosemite's problems worse, rendering the valley more inaccessible, with more congestion, thereby removing the entire point of places like Yosemite...providing a quiet respite and fountain of life for weary souls.

(Individual; Correspondence #3613)

The DEIS Preferred Alternative relies on intrusive and impactful infrastructure for visitor use. The DEIS does little to address impacts to the protected values of the Merced WSR. The Plan tolerates about the same amount of crowding, and even proposes to provide for increased numbers of daily visitors. The DEIS would construct new facilities such as camping, housing, lodging, with some of these in undisturbed areas. We absolutely reject that the Yosemite Merced must "settle" for additional degradation. We think that increased levels of human use is proof that this plan has missed the point, and clearly ignores recent guidance given by the Court.

(Individual; Correspondence #3693)

Response: The action alternatives included in the plan present a range of capacities that that would achieve the mandates of the Wild and Scenic Rivers Act but in different ways. Alternative 5 (Preferred) would reduce the maximum number of people at one time in Yosemite Valley It also includes actions (some common to all alternatives, others unique to Alternative 5 [Preferred]) that manage visitor use in other ways to address congestion and improve the quality of visitor experiences. For example, all alternatives include the active use of the Traffic Diversion System at the El Capitan cross-over when the maximum vehicles at one time for East Valley have been reached. This will ensure that capacity does not exceed the levels outlined in the alternative. Additional information on capacities, their relationship to river values, and the tools used to manage capacity can be found in “User Capacity and Visitor Use Management” (Chapter 6). Additionally, the Recreational ORV in Yosemite Valley is managed and monitored with site-specific density standards to ensure that use does not exceed visitors acceptable use levels. Additional information on the monitoring and actions associated with the Recreational ORV can be found in “River Values and their Management” (Chapter 5). Finally, throughout the planning process, transportation analyses were performed to ensure that congestion on roadways would not exceed acceptable levels in any alternative. A final analysis of the Preferred Alterative as it appears in the FEIS has also been completed and shows that all intersections and roadways will perform better than under current conditions.

Concern 10: The NPS should not remove visitor services and facilities as proposed in the Plan because these actions are not required by the WSRA or by the Ninth Circuit Court of Appeals ruling.

> *The Park Service is attempting to justify this as a court-ordered response to the Wild and Scenic Rivers Act. This is disingenuous. The settlement agreement they refer to simply requires that a plan be adopted consistent with current law relative to the Merced River – it does not mandate such radical changes in long-standing visitor services and amenities. Indeed, former Congressman Tony Coelho, who authored the act that designated the Merced under provisions of the Wild and Scenic Rivers Act, has just released a strong letter condemning the proposal...when Mr. Coelho authored the legislation designating the Merced as Wild and Scenic, these tourist facilities already existed and nowhere in the bill's findings is there any mention of an intention to force their closure or to override Park policies. In fact, many of the facilities slated for removal are not even on the Merced River and do not in any way impede or affect its flow...The officials of the National Park Service are clearly not required to take these actions.*
>
> (Individual; Correspondence #3656)
>
> *Referencing Friends of Yosemite Vs. Kempthorne sub-paragraph 5, I would like to point out that nowhere in the judge's ruling does it state that the ice rink, pool, bicycle rentals or any other concessioner service must be terminated. The ruling of the judge stated that the park service has made no attempt to explain the necessity of these services, and did not mention a specific "need" for removal of valley functions. As a Yosemite Valley resident, it is my humble belief that a ruling stating the courts need for a justifiable reason for the continuation of concessioner services within the river corridor has been misinterpreted by the Park Service to mean that all recreational concession functions in the river corridor must be removed or relocated.*
>
> (Individual; Correspondence #3668)

Response: The Ninth Circuit Court of Appeals ruling requires the NPS to prepare a Comprehensive Management Plan for the river that complies with the WSRA. As interpreted by the Court, the WSRA requires the NPS to adopt specific measurable limits on use that will be protective of ORVs. The Court also indicated that the NPS could not presume that facilities and services in place prior to the river's designation as wild and scenic were protective of river values. As a result, the NPS re-evaluated the range of facilities and services provided (and proposed) in the river corridor (See our response to Concern IDs 345 and 347 for additional details about the process that NPS followed.). Decisions regarding facilities and services in the alternatives reflect choices about different ways to achieve the mandate of the WSRA and to comply with the court's ruling.

Concern 11: The NPS should improve the consistency of its analysis of retaining or removing commercial services, visitor facilities, and park infrastructure.

> *Indeed, there is lots of inconsistency in the new plan. If you wanted to remove all infrastructure in the valley, you would take out roads, trails, the Ahwanee, the steps and railings on the face of Half Dome, public toilets, etc. But you are leaving some things and destroying others, on no discernible basis. There needs to be a more rational approach.*
>
> (Individual; Correspondence #2802)
>
> *The Wawona Golf Course, Concessioner Stables in Wawona, Wawona pool, Ahwahneed sweet shop, and Curry Village pool should be eliminated. If concessioner horseback riding is "not a vital visitor service" in Yosemite Valley, then it certainly is not in Wawona. Likewise for the pools – saying that the Ahwahnee pool and Lodge pool are "not integral to the Historic ORV"(8-88) and "not considered a vital visitor or community service" (8-91), but arguing that the Wawona Hotel pool "is open to hotel guests during peak periods only when weather conditions are favorable and reduces the number of people swimming in the river" (8-97) is bogus reasoning... Pools are not appropriate for a national park. We should be encouraging people to swim in rivers. Likewise for golf courses – how can you remove bike rental from Yosemite Valley and keep a golf course in Wawona? It is unconscionable, inconsistent, and inappropriate.*
>
> (Individual; Correspondence #3520)

Response: "Development of Lands and Facilities" (Chapter 7) has been revised to more clearly present a rationale for each facility addressed in the plan. Specifically, as presented in Chapter 7, Table 7-1: Evaluation of Major Public-use Facilities within the River Corridor, each facility has been individually evaluated in the context of: (1) how it was addressed in the 1980 Yosemite General Management Plan, (2) whether it is feasible to relocate outside the river corridor, (3) whether it is necessary for public use or protection of the resource, (4) its potential for local adverse effects to river value(s), and (5) what mitigation measures are required to protect river values. Chapter 7 presents a more thorough discussion of this analysis. The facilities tables in "Alternatives" (Chapter 8) have been revised to show the basic retention, removal or relocation of facilities, leaving the evaluation and rationale facilities actions in Chapter 7.

Concern 12: The NPS should provide additional biological and social science data to support proposed management actions so the public can better understand the consequences of the plan.

> *I cannot support any alternative of this 2013 draft plan because… potential management actions listed in the draft MRP need justification, both scientifically (data about biological ORVs) and in terms of social equity (data on transportation and socioeconomics), before the public can be asked to "vote" for a favorite alternative or even their favorite elements of any one alternative. … The details are lacking both scientifically (where's the data for the current condition of biological Outstandingly Remarkable Values in the river corridor?) and in terms of transportation issues (what are the current numbers of busses, and visitor and employee vehicles in traveling in the river corridor?). How can the public weigh social equity issues and preservation while being expected to "vote" for a favorite alternative or list the elements they personally like? … I would hope park managers have considered that if we had concrete information on the condition of the biological ORVs and accurate transportation and socioeconomic figures, we all might have an easier time justifying which facilities and services are appropriate in a place like Yosemite, and which are not. This is the type of information that would inform reasonable discussion and the difficult decisions regarding access.*
>
> (Individual; Correspondence #3325)

Response: "River Values and their Management" (Chapter 5) presents a detailed discussion on the condition of river values and the scientific data used to draw conclusions about these condition. The *Merced Wild and Scenic River Values Draft Baseline Conditions Report* (Draft Baseline Conditions Report) can be found at: http://www.nps.gov/yose/parkmgmt/mrp_research.htm. The report was first published in April 2011, and updated in July 2012 to include insight from research studies, as well as pertinent information from public review and comment on the report. "Affected Environment and Environmental Consequences" (Chapter 9) evaluates impacts of the actions in alternatives by impact topic type, in accordance with NPS Director's Order 12: Conservation Planning, Environmental Impact Analysis, and Decision-Making.

Concern 13: The NPS should specifically look at each facility and service and their impacts which currently degrade the Merced River.

> *There seems to be fundamental confusion in the DEIS about what to do about ongoing impacts. The DEIS does contain some generalized disclosures of current impacts in connection to the No Action Alternative. But planners have stated elsewhere that the Merced River is currently not being impacted. We conclude that the DEIS is in some amount of denial about something that is very clear to us: the protected values of the Merced River- including the space allotted for recreation, and the quality of recreation - are currently impacted by many of the very uses and facilities that the DEIS proposes to ratify as "supportive" elements of the plan. This is a fundamental error.*
>
> *With a crack in the foundational reasoning of the Plan, it is as if the DEIS leans far from the center of gravity. The "Decision Tree" on page 8-5 asks whether a facility or service should justifiably remain in the River corridor to "support use". But what uses does that mean? The question is too general, and it is far too easy to say "yes". Almost everything supports use in some way. But in asking this question so*

> *broadly, the DEIS does not specifically look at each facility and service and their impacts which currently degrade the Merced WSR. We think this is a fundamental error.*
>
> (Individual; Correspondence #3693)

Response: "River Values and their Management" (Chapter 5) presents a discussion for each river value and its relative condition at both the time of designation and present day. While a number of river values are experiencing localized concerns, none are degraded. All such concerns are clearly stated in the "Management Concerns and Protective Actions" discussion for each river value in Chapter 5. Actions to mitigate local effects are included in the Actions Common To Alternatives 2–6 in "Alternatives" (Chapter 8).

Additionally, "Development of Lands and Facilities" (Chapter 7) has been revised to more clearly present an evaluation of each existing and proposed public use facility addressed in the plan. Specifically, as presented in Chapter 7, Table 7–1: Evaluation of Major Public-use Facilities within the River Corridor, each facility has been individually evaluated in the context of: (1) how it was addressed in the 1980 Yosemite General Management Plan, (2) whether it is feasible to relocate outside the river corridor, (3) whether it is necessary for public use or protection of the resource, (4) its potential for local adverse effects to river value(s), and (5) what mitigation measures are required to protect river values. This evaluation identified whether facilities could feasibly be relocated outside the river corridor, or, if they remained, whether they are necessary for public use and can be maintained without adverse effects to river values.

Please see Table 7-1 in Chapter 7 for the rationale of why specific facilities are either relocated outside the river corridor or removed.

Concern 14: The NPS should incorporate the types of uses, services, and facilities that existed in Yosemite Valley prior to the 1997 flood as part of the preferred alternative.

> *All of the action alternatives present a biased approach to management that is averse to maintaining the historic and valued recreation activities that are beloved by the general public. The Plan is geared towards a very narrow spectrum of user activities, as stated in the Plan 'Self-reliant Visitor Experiences.' It is our belief that the historic uses, services and facilities should be allowed to continue at the levels prior to the 1997 flood. Yosemite National Park is iconic, and should be planning to receive visitors and provide recreational activities that will encourage and enhance the visitors' appreciation and enjoyment of the natural resources of the Park. All of the action alternatives in this Plan work to do just the opposite.*
>
> (Individual; Correspondence #3483)

Response: In Alternatives (Chapter 8), Alternative 1 (No Action) describes the current condition (or baseline condition) from which Alternatives 2–6 are compared to. Capacity increases or decreases proposed in Alternatives 2–6 are in comparison with what exists on the ground today for camping, lodging and parking. The baseline numbers of campsites in both the DEIS and FEIS, for example, were based on existing, on-the-ground conditions as of 2011. Other inventories, whether defined by the GMP or other planning documents, or existing at the time of designation are no longer relevant given the effects of the 1997 flood and subsequent direction by the U.S. Ninth Circuit Court of Appeals to amend the GMP so that it conforms to a legally-valid comprehensive river management plan. NPS did evaluate some "pre-flood condition" levels of camping, lodging and parking as components of the various alternatives explored in Chapter 8. For example, Alternative 6 proposes restoring the number of units at the Yosemite Lodge to 440 units (the number of units that existed prior to the 1997 flood).

Purpose and Need—Relationship to Other Plans

Concern 15: The NPS should not need to do a river plan since the DEIS indicates the river is in excellent condition and cites many other improved environmental issues.

> *To me these plans seem to be a fix to a problem that does not exsist. The river is in exceptional state per this report. The report also sites many other environmental issues that have improved over the course of years.*
>
> (Individual; Correspondence #116)
>
> *The NPS should retain visitor services because their removal provides no environmental benefit, is not required by WSRA and the public greatly values these services. According to the Merced River baseline conditions report, the river is in excellent condition--better than when it was designated. The studies found that natural resources and ORVs are not degraded as suggested in footnote 5. If the science shows that current conditions are within the standard of acceptability, it is unclear to us why so many visitor services are being eliminated or reduced, or why there is such a concerted effort to move so many facilities out of the river corridor.... Visitors have been skating on an ice rink in Curry Village since 1928. No negative impacts were identified by NPS from this activity and it has no impact on summer days when visitation is highest. The ice rink is a valued and unique traditional experience forYosemite's winter visitors.*
>
> (Individual; Correspondence #2818)
>
> *Merced River Plan satisfies the demands of the Ninth Circuit Court as it adequately addresses user capacities, degradation, and a No Action Alternative. So, there is no justification for eliminating any recreational activities or services intended for the continuing enjoyment of the public.*
>
> (Individual; Correspondence #2993)

Response: The Wild and Scenic Rivers Act requires that river managing agencies prepare a Comprehensive Management Plan for each river that is included in the Wild and Scenic Rivers System. This requirement is found in Section 3(d) of the Act. In addition, the 2009 Settlement Agreement, which resolved long-running litigation challenging the validity of earlier versions of the plan, requires the NPS to complete a valid Comprehensive Management Plan for the Merced Wild and Scenic River. The Settlement Agreement, as amended, requires that the plan be completed by March 2014 . Although the Merced River is in excellent condition, the NPS is nevertheless required by law to complete a comprehensive river management plan.

Concern 16: The NPS should improve consistency between existing management plans (the General Management Plan and the Concession Services Plan) and the Merced River Plan.

> *Including an alternative the meets the law cannot somehow show the Park Service as being in compliance with the GMP goal if the actual selected alternative results in the complete opposite of the goal (such as Alternative 5).*
>
> (Individual; Correspondence #2207)
>
> *ALTERNATIVE 5 ALSO CONFLICTS WITH THE GENERAL MANAGEMENT PLAN -- SO SIGNIFICANTLY THAT AMENDING THE GMP CANNOT BRING IT INTO CONSISTENCY WITH ALTERNATIVE 5. THUS THE PREFERRED ALTERNATIVE FAILS TO MEET THIS LEGAL MANDATE AS WELL.*
>
> (Individual; Correspondence #2212)
>
> *ALTERNATIVE 5 ALSO CONFLICTS WITH THE GENERAL MANAGEMENT PLAN -- SO SIGNIFICANTLY THAT AMENDING THE GMP CANNOT BRING IT INTO CONSISTENCY WITH ALTERNATIVE 5. THUS THE PREFERRED ALTERNATIVE FAILS TO MEET THIS LEGAL MANDATE AS WELL.*
>
> (Individual; Correspondence #2212)

Response: When Congress added the Merced River to the Wild and Scenic Rivers System in 1987, it directed the NPS to fulfill the planning requirements of the Wild and Scenic Rivers Act through "appropriate revisions" to the park's General Management Plan. Congress further directed that such revisions "shall assure that no development or use of park lands shall be undertaken that is inconsistent with the designation of such river segments" under the Wild and Scenic Rivers Act. The park's General Management Plan was issued in 1980, seven years before the river was added to the Wild and Scenic Rivers System. The General Management Plan did not address planning elements now required by the Wild and Scenic Rivers Act such as river boundaries and segment classifications, Outstandingly Remarkable Values, and User Capacity. The Merced River Plan amends the General Management Plan by incorporating these WSRA elements into the GMP. In addition, site plans presented in the GMP for developed areas within the river corridor will be superseded by the site plans for Alternative 5 (Preferred) if it is selected in the Record of Decision. These amendments to the GMP are consistent with the requirement that NPS revise the GMP to ensure that development and use of park lands within the river corridor will be consistent with the river's designation as wild and scenic.

Concern 17: The NPS should revise the GMP Amendment to be more specific.

> *So, to restate… the GMP amendment with respect to "no ultimate exclusion of private vehicles" as currently written on page A-13 of the DEIS is meaningless. One has to conclude from explanations throughout the text that if there was more money and/or more time, it would be full steam ahead. It seems park planners/administrators still appear to be adhering to the original goal of the 1980 GMP albeit it in incremental steps.*
>
> (Individual; Correspondence #1617)

Response: The General Management Plan has been amended to reflect actions in the MRP and statements regarding exclusion of private vehicles have been stricken. These revisions to the General Management Plan are described in Appendix A.

Concern 18: The NPS should clearly state if commercial recreation facilities or activities are causing degradation, and whether that degradation can be corrected or mitigated without removing those facilities.

> *In the final CMP/EIS, the NPS should clearly state whether measurable degradation of any kind has resulted from the construction, maintenance or on-going use of any of the above enumerated [commercial recreation] facilities. If degradation, as described in applicable statutes, case precedents or agency policies, is identified, the final plan should state whether such degradation can be eliminated, mitigated or managed in ways that would allow for continued use without the need for total removal under the final MRPCMP/EIS. The NPS should explain whether degradation can be mitigated with continued management oversight. In other words, is the Organic Act sufficient to protect park resources, including the Merced Wild and Scenic River, and to provide for visitor use and enjoyment of those resources for current and future generations of visitors, thus achieving the balanced dual mission of the National Park Service?*
>
> (Individual; Correspondence #2133)

Response: See response to Concern Statement 13.

Concern 19: The NPS should acknowledge that the degradation caused by vehicles that's described in the GMP is ongoing, and take management action to significantly reduce the source of that degradation.

> *[ALTERNATIVE 5 PROPOSES ACTIONS THAT DIRECTLY CONFLICT WITH THE PARK'S GENERAL MANAGEMENT PLAN] … The Park Service's General Management Plan for Yosemite*

Park makes it clear that thousands of private vehicles crowding into Yosemite Valley during peak visitor periods results in noise, smell, glare, and other environmental degradation. ... THE CURRENT POSITION TAKEN BY YOSEMITE PARK ... IS THAT THERE IS NO DEGRADATION OF RESOURCES OCCURING IN YOSEMITE VALLEY. CSERC POINTS TO THE GENERAL MANAGEMENT PLAN AS THE FIRST CLEAR REBUTTAL TO THE PARK'S INCORRECT AND ILLEGAL POSITION.

(Individual; Correspondence #2207)

EITHER THE FEIS AND FINAL DECISION FOR THE MERCED PLAN MUST PROVIDE EVIDENCE THAT THE DEGRADATION DESCRIBED IN THE GMP IS NO LONGER OCCURRING DESPITE THE FACT THAT THERE ARE THOUSANDS OF MORE VEHICLES NOW THAN IN 1980, OR THE FEIS MUST ACKNOWLEDGE THAT DEGRADATION IS INDEED OCCURING IN YOSEMITE VALLEY AND THE RIVER CORRIDOR DUE TO SO MANY THOUSANDS OF VEHICLES. IF DEGRADATION IS OCCURRING, THAT IS A VIOLATION OF THE WILD AND SCENIC RIVERS ACT. THEN THE FINAL SELECTED ALTERNATIVE FOR MANAGING THE MERCED RIVER CORRIDOR MUST APPLY MANAGEMENT ACTIONS TO SIGNIFICANTLY REDUCE THAT SOURCE OF DEGRADATION – THAT SOURCE OF NOISE, SMELL, GLARE, AND OTHER ENVIRONMENTAL DEGRADATION – WHICH ARE CAUSED BY THE THOUSANDS OF VEHICLES THAT CROWD YOSEMITE VALLEY EACH DAY DURING THE BUSY PEAK VISITOR SEASON.

(Individual; Correspondence #2207)

Response: "River Values and their Management" (Chapter 5) analyzes each river value for possible degradation. Based on monitoring conducted to date, no instances of degradation have been identified. However, the NPS does agree that traffic congestion affects the quality of the visitor experience. The plan addresses traffic congestion and vehicle impacts in a number of ways including user capacity limits on the number of vehicles allowed in the Valley, traffic diversion measures, circulation improvements, and restoration projects. These measures will prevent vehicle use from adversely impacting or degrading ORVs.

Concern 20: The NPS should include the removal of all automobiles from Yosemite Valley in the proposed plan to be consistent with the GMP goals and objectives.

CSERC strongly disagrees that the Merced River Plan as represented by the Park's Preferred Alternative reflects the GMP goals and objectives to remove private automobiles from Yosemite Valley. Instead, Alternative 5 proposes to raise the user capacity level, increase the number of parking spaces, and "provide visitors the freedom to access Yosemite Valley by personal vehicle" .... Alternative 5 does not reflect in any fashion the GMP goal or objective to remove private vehicles from Yosemite Valley. This is a pivotal legal point that we ask the EIR to fully acknowledge and correct.

(Individual; Correspondence #2207)

Another pivotal legal point is the false claim in the DEIS on page 2-9 that the goal of the GMP (to markedly reduce traffic congestion and remove private vehicles in Yosemite Valley) is somehow met because "Alternatives 2-6 propose enhancements to circulation and parking, expand the regional public transit system, and propose new service between Fresno and Yosemite Valley." CSERC disputes this claim as incorrect. This claim is incorrect and bizarre logic, at best, and intentionally misleading, at worst. Just because one or more of the possible alternatives crafted in the plan may provide some minor reduction in vehicles reaching the Park, that does not make the Preferred Alternative consistent with the "key goal" or objective, which is to remove private vehicles from Yosemite Valley

(Individual; Correspondence #2207)

Response: As explained in "Purpose and Need for the Plan" (Chapter 2), none of the alternatives in the plan propose the complete removal of private vehicles from Yosemite Valley. This decision was based on several factors. First, the infrastructure to support a transit system for all Valley visitors is not in place nor is funding

available in the near future. Land needed for satellite parking is also not currently available. Finally, the planning needed to develop a regional transit system cannot be completed within the timeframe for this plan. The MRP has amended the goal of the GMP to remove all private vehicles from Yosemite Valley. Please see Appendix A for additional detail.

Concern 21: The NPS should redirect development of any substantial amount of facilities to the periphery of the Park and beyond to remain consistent with the goals and objectives of the GMP.

> *Alternative 5 also fails to redirect the development of any substantial amount of facilities to the periphery of the Park and beyond as required by the GMP, and instead does the opposite. Alternative 5 proposes to construct 56 new permanent structures within the river corridor to replace temporary facilities or to expand facilities.*
>
> (Individual; Correspondence #2207)
>
> *ALTERNATIVE 5 PROPOSES ACTIONS THAT DIRECTLY CONFLICT WITH THE PARK'S GENERAL MANAGEMENT PLAN ... the 1980 General Management Plan that is still in effect for Yosemite Park ... . As noted, GMP spells out that the foremost responsibility of the Park Service is to perpetuate the natural splendor of Yosemite Valley. The GMP spells out that the Park intent is to remove all automobiles from Yosemite Valley and to redirect development to the periphery of the Park and beyond. ... GMP emphasize the regulatory intent and direction to reduce crowding, remove private vehicles from Yosemite Valley, and redirect development to the periphery of the Park and beyond. Those are clear mandates of the General Management Plan. ... ALTERNATIVE 5 ALSO CONFLICTS WITH THE GENERAL MANAGEMENT PLAN -- SO SIGNIFICANTLY THAT AMENDING THE GMP CANNOT BRING IT INTO CONSISTENCY WITH ALTERNATIVE 5. THUS THE PREFERRED ALTERNATIVE FAILS TO MEET THIS LEGAL MANDATE AS WELL.*
>
> (Individual; Correspondence #2207)

Response: As discussed in response to Concern ID 16, the GMP was issued seven years before the Merced River was designated wild and scenic. The NPS is now charged with managing lands in the river corridor in accordance with the Wild and Scenic Rivers Act, which specifically directed the NPS to revise the GMP to ensure its consistency with NPS's additional management responsibilities under WSRA. Some specific site development actions proposed in the GMP were found to be inconsistent with the protection of ORVs while others, such as removing private vehicles from the Valley, were found to be infeasible under current conditions. The legislation that added the Merced to the Wild and Scenic River System contemplated that the NPS would amend certain aspects of the GMP through the river management planning process. The amendments the MRP makes to the GMP are detailed in Appendix A.

Concern 22: The NPS should not take any actions that would limit public access and enjoyment of Yosemite National Park, in order to be consistent with the Yosemite Land Grant Act of 1864.

> *The 1864 Act authorizing the original Yosemite land grant to the State of California stated that the "premises shall be held for public use, resort, and recreation" and "shall be inalienable for all time." The draft plan in question directly contravenes the authorization, and we are firmly against NPS taking any action that would limit public access and enjoyment of Yosemite.*
>
> (Individual; Correspondence #2792)
>
> *Regardless, I think it is important to note that the DEIS is in direct contradiction to the original act of 1864 which authorized the original Yosemite land grant. That act states that Yosemite "shall be held for public use, resort, and recreation" the grant further states that this use of Yosemite "shall be inalienable for all time." Exactly how does removal of the ice skating rink, bike rental facility and horse stables improve "public use, resort, and recreation"?*
>
> (Individual; Correspondence #3315)

Response: The 1864 Act of Congress referenced in the concern statement was an act through which Congress conveyed the land comprising Yosemite Valley to the State of California for "public use, resort and recreation" purposes. The State of California managed Yosemite Valley for these purposes until 1905 when it conveyed the Valley back to the United States. Congress accepted this conveyance and provided by statute that the Valley, along with other areas, would be managed as a "forest reservation." (Act of June 11, 1906.) The 1864 Act applied to the State's management of the Valley between 1864 and 1905. It does not direct NPS's current management of Yosemite Valley.

Concern 23: The NPS should remove High Sierra Camps because their presence and impacts are incompatible with the WSRA, the NPS Organic Act, and the Wilderness Act.

> *The DEIS analysis seems confused. It notes harmful impacts from the camp at Merced Lake, but the preferred alternative is to keep the camp, albeit at a slightly reduced capacity (42 people versus 60) and to install composting toilets. How does this solve the big issue of whether the camp is compatible with the NPS OA, the WSRA and the Wilderness Act, let alone issues such soil compaction, helicopter access and trail use? ... In addition to violating NPS policy regarding potential wilderness, the Merced Camp also violates the Wild and Scenic Rivers Act. The WSRA defines a wild river as one with watersheds or shorelines essentially primitive and waters unpolluted. Regulations implementing the law state wild rivers will be "essentially free of structures." Courts have held that structures like those at Merced Camp are incompatible with wild river designation management. In summary, by keeping the High Sierra Camps, the preferred alternative fails to meet the Wilderness Act, Park Service Policy on potential wilderness, the Wild and Scenic Rivers Act (both in terms of structures in a wild river and the failure to limit commercial uses in wild river corridor), the California Wilderness Act of 1984 (timely removal of the camps given their impacts), and the OA for the national parks.*
>
> (Individual; Correspondence #2730)

Response: The California Wilderness Act of 1984 designated the area containing Merced Lake High Sierra Camp as potential wilderness. A report issued by the House of Representatives (House Report 98-40, March 18, 1983) explained the intent of the California Wilderness Act with regard to Yosemite's High Sierra Camps. The report stated that if future operational standards for the camps resulted in increased adverse impacts on the adjacent wilderness environment or increased adverse impacts on the natural environment within the camp area, the camps should be promptly terminated and the areas converted to full wilderness status.

The Merced Lake High Sierra Camp is the only camp within Merced River corridor. Alternative 5 (Preferred) proposes a number of changes to the Merced Lake High Sierra Camp, including a reduction in the number of beds. If Alternative 5 (Preferred) is selected in the Record of Decision for this plan, the camp would be able to remain and the area would retain its potential wilderness designation.

The NPS also analyzed whether the camp adversely affected ORVs and whether it was feasible to remove or relocate the camp outside the river corridor. This analysis is found in "River Values and their Management" (Chapter 5), "Development of Land and Facilities" (Chapter 7), and "Alternatives" (Chapter 8) of the plan. Although the WSRA does not require the NPS to remove the camp, Alternative 5 (Preferred) proposes to reduce the size of the camp and the types of services it provides. The NPS's preferred alternative therefore proposed retention of the camp albeit at a reduced scale.

The National Park Service Organic Act is discussed in "Purpose and Need for the Plan" (Chapter 2) of the FEIS. The Organic Act prohibits actions that would result in the impairment of park resources and values. (See NPS Management Policies 2006, Section 1.4.) Impairment determinations are included in decision documents and are based on analyses contained in the underlying compliance documentation for a

proposed action. The decision document for the MRP will be the Record of Decision. An impairment determination for the alternative selected for implementation will be included in the Record of Decision.

Concern 24: The NPS should defer management of visitor use in Wilderness to the forthcoming Wilderness Stewardship Plan, in order to avoid fragmented planning.

> *...it seems that planning for the Merced Lake High Sierra Camp should be discussed within the context of the entire High Sierra Camp Loop as part of the future Wilderness Stewardship planning process. To discuss it now, and reach conclusions about it in a piecemeal manner as part of the MRP, will have biased future discussion about the other High Sierra Camps.*
>
> (Individual; Correspondence #3604)
>
> *The final EIS and Plan for this river should drop the discussion of how many people are appropriate on Wilderness trails, and defer that discussion to the Wilderness Stewardship planning process. It should be discussed within the broader framework of Wilderness management (stewardship), and not addressed in the piecemeal manner which is being done at present through the MRP. Any decisions made through the MRP to regulate the number of day-hikers allowed on a trail would bias the future Wilderness Stewardship planning process. We question the legality of this piecemeal approach to planning for the appropriate number of people on a Wilderness trail.*
>
> (Individual; Correspondence #3604)

Response: The Wild and Scenic Rivers Act mandates that the National Park Service address user capacity in all designated segments of the river, including those in designated wilderness. As a result, the NPS cannot defer decisions regarding visitor use levels to the Wilderness Stewardship Plan. Visitor Use will be also analyzed in the Wilderness Stewardship Plan in terms of wilderness character. Any additional visitor use prescriptions adopted in the Wilderness Stewardship Plan for lands within the river corridor would have to comport with the MRP as well as be designed to preserve wilderness character.

Concern 25: The NPS should not institute a permit requirement for day-hiking because this would limit public support for Wilderness Act and the concept of designated Wilderness.

> *Using the Wilderness Act as justification for requiring permits for day-hiking would have the effect of turning people against the concept of designated Wilderness. With its potential to turn people against the concept of Wilderness, this would be a direct threat to the Wilderness Act.*
>
> (Individual; Correspondence #3604)

Response: The National Park Service has an obligation to meet the mandates of the Wilderness Act, The Organic Act, The Wild and Scenic Rivers Act, and other laws. None of these laws contain a mandate to maintain political support for the Wilderness Act.

Concern 26: The NPS should not construct any infrastructure at the Merced Lake High Sierra Camp, including pit toilets, because it is specifically prohibited by the General Management Plan.

> *Furthermore, the General Management Plan (GMP) for Yosemite National Park states that: "Potential wilderness classification will prevent any further development of facilities or services; should existing developments be removed, there will be no reconstruction of facilities." Yet, despite the clear direction from Congress and this clear direction contained in Yosemite's own GMP, the draft Plan proposes to construct new toilet facilities at some HSCs. This would be unlawful. The GMP clearly prohibits any further installation of facilities or services at the HSCs. The NPS should stop trying to rationalize the existence of the HSCs, and it should cease all plans to install new facilities or services.*
>
> (Civic Groups; Correspondence #3125)

Response: The 1980 GMP was issued four years before Congress designated the Yosemite Wilderness. The GMP indicated that the camps would continue to operate as visitor destinations.

In 1984, Congress designated the Yosemite Wilderness but excluded the camps themselves from wilderness. As explained in response to Concern 23, Congress indicated that the high sierra camps could remain provided that their future operations did not result in increased impacts to wilderness or natural resources. The modifications proposed to the Merced Lake High Sierra Camp under Alternative 5 would reduce the camp's impacts on wilderness character, water quality and other resources. The NPS does not believe that the construction of pit toilets to replace flush toilets is prohibited.

Concern 27: The NPS should revise the MRP/EIS to be aligned with the GMP, rather than using the MRP to amend the GMP.

> *Park staff and the DEIS both assert that the GMP will be changed AFTER a decision is made on the Merced River Plan so that the amended GMP will be consistent with the decision. CSERC asserts that approach is not either in legal compliance with GMP direction as the programmatic management direction for the Park or in legal compliance with NEPA. The existing programmatic legal direction for a federal land area or agency is the authorized mandated direction for planning until such time that it is formally amended or replaced. A plan or project tiered to the programmatic overarching plan cannot be inconsistent, yet be approved, and then have the approving agency rely upon the original programmatic plan to be altered to now come into compliance with the plan or project.*
>
> (Individual; Correspondence #2207)

Response: The MRP is consistent with the overarching goals and objectives of the GMP, although some of the specific actions have been amended to comply with the Wild and Scenic Rivers Act, to reflect site specific NEPA evaluation, and to address user capacity issues mandated by the U.S. Court of Appeals. The relationship between the Merced River Plan and the General Management Plan is described in more detail in the "Interrelationship with 'General Management Plan' for Yosemite" section in Chapter 2, "Legal and Policy Framework."

Purpose and Need—WSRA Elements

Concern 28: The NPS should clarify how the removal of commercial services from the river corridor relates to the WSRA.

> *The plan is unfairly restrictive on visitor activities, reduces ADA accessibility and restricts recreational opportunities for a diversity of user groups through its management actions ... we believe these actions are not required by WSRA.*
>
> (Individual; Correspondence #2818)
>
> *Chapter 7 (Facilities and Services Analysis) analyzes structures and facilities within each segment of the river corridor in relation to their effect on river values.*
>
> *Housekeeping Camp Store, Curry Village Raft Rental, Stables, Bike Rental and Ice*
>
> *Rink, The Ahwahnee swimming pool, Happy Isles Snack Stand, Concessioner General Office Building, Village Sports Shop, Concessioner Garage, Yosemite Lodge Swimming Pool, Snack Stand, Nature Shop and Housekeeping/Maintenance Building are all separately listed and are concluded to have no impact on river values, with the conclusion that there are "No required actions or mitigation measures" associated with these services and facilities. Yet, each of the services and facilities are noted for removal or relocation. ... Since it appears the services and facilities discussed are appropriate under the WSRA and the 1998 Concession Management Improvement Act, it would appear the language of footnote 5 is driving the conclusion that these services and facilities need to be removed or relocated. Further, it appears a new term,*

"vital", is being used to evaluate long practiced commercial services, rather than terminology that is used in WSRA or the "appropriate and necessary" terms that is the criteria under concession law and policy.

... The extension of the argument by the NPS that something [a facility or service] must contribute to the ORV's to have standing inside a river corridor isn't clear to us from our reading of footnote 5 and is certainly not required by WSRA.

(Individual; Correspondence #2818)

Human use, including recreation, work, and administration in the Merced River Corridor require resources; land, parking, view-scape, sound-scape, food, water, air. These resources are inherently limited in Yosemite. In discussing limits for the Merced, the DEIS should say what it supports and what it does not, providing a clear picture of its values and goals, and exactly how these came from the WSRA. We think the DEIS discusses amounts of things, but does not forge a clear link between the values of the WSRA and what it proposes.

(Individual; Correspondence #3693)

Response: The Wild and Scenic Rivers Act (WSRA) requires that management plans prepared for rivers designated under the act will address "development of lands and facilities" in the river area. The Wild and Scenic Rivers Act (WSRA) and *National Wild and Scenic Rivers System: Final Revised Guidelines for Eligibility, Classification and Management of River Areas* (Secretarial Guidelines) provide direction on the types of facilities that may be maintained within a river area. In addition, the 2008 decision issued by the U.S. Court of Appeals for the Ninth Circuit (Ninth Circuit) in Friends of Yosemite Valley v. Kempthorne questioned whether the level of development in some parts of the river corridor was sufficiently protective of ORVs.

To address these legal requirements, "River Values and their Management" (Chapter 5) of the plan discusses the level of historic and current development in the river corridor and "Development of Lands and Facilities" (Chapter 7) has been revised to more clearly explain the basis for retaining or removing facilities from the river corridor.

Concern 29: The NPS should clearly differentiate and prioritize protection of primary emphasis ORVs over recreational uses, as directed by the WSRA and the Secretarial Guidelines.

Finally, I request you look closely at the WSR Act statutes which set clear priorities on protecting and preserving the resource over providing for recreational uses. And please review before making an 'activity' or 'use' of the Mercedes WSR an OR value.

16 U.S.C. § 1271. "Requires rivers with their immediate environments… shall be preserved in their free-flowing conditions, and that they and their immediate environments shall be protected…. to fulfill other vital national conservation purposes."

The § 1271 preservation mandate is to be applied to the river and immediate environment. This resource is to be "preserved in a free flowing condition" to fulfill "vital conservation purposes." The WSRA preserves the resource, which possesses Outstanding and Remarkable Values, not the values themselves. If scenic, historic, geologic or cultural values were ever in a "free-flowing condition," it would be unlikely that anyone would want that condition to continue, let alone be preserved by legislation. The Congressional intent of the WSR Act is preservation of the resource, not preservation of 'use' of the river for idle recreational whims or the fade de jour.

16 U.S.C. § 1281 (a) Each WSR "shall be administered" to standards that require both protection and enhancement of all values, while placing "primary emphasis" on resource esthetics and associated features. The statutory requirement is to "administer" under principles which must first protect the resource features, then protect the resource values and if a recreational activity does not degrade those values (at all) then, and only then, can that activity be allowed. The WSR Secretarial Guidelines interpret this goal as a non-degradation policy for the river area. (Guidelines, 47 Fed. R. 39458.) The

statute makes clear that primary emphasis is to be placed on protection of the non-use resource features of the river area. Protecting use is a false construct of the WSR statute.

16 U.S.C. § 1281 (b) can not be misinterpreted, WSRs flowing through wilderness requires applying the most restrictive provisions.

(Individual; Correspondence #180)

Do not allow pressure from any kayak lobby or any special interest group to destroy this extraordinary resource in order to pursue idle recreational whims. There are numerous other rivers nearby to support this activity. Only the WSRs that have been placed in your care can be protected from overuse, or from turning these spectacular WSRs into another paddling amusement park. Please do not foreclose on a unique attribute of the Tuolumne, and the Mercedes; the opportunity to still enjoy and experience a wild river without constant floater interruptions.

(Individual; Correspondence #180)

I am not supportive of the Preferred Alternative. I believe it is contrary to the Wild and Scenic Rivers Act (as it does not go far enough in restoring the river corridor) and is not in keeping with Friends of Yosemite v. Kempthorne (as it does not truly address the issue of User Capacity). The preferred alternative calls for significant increase in day use parking, camping and lodging, while calling for one of the lowest amounts of acreage restoration of any of the alternatives. If the primary goal is to protect the Merced River corridor, why would the Preferred Alternative be a good thing? Cramming more and more people into the Valley each summer only benefits the Park Concessionaire. It does not benefit the river corridor, and most definitely detracts from the visitor experience.

(Individual; Correspondence #2602)

Response: The Wild and Scenic Rivers Act and the Secretarial Guidelines direct agencies to manage designated rivers in a manner that protects and enhances river values while providing for public recreation and resource uses as long as such uses do not degrade river values. The Act further directs that primary emphasis be given to the river's aesthetic, scenic, historic, archeologic and scientific features. As explained in "The Merced Wild and Scenic River" (Chapter 1), the purpose of this plan is the protection and enhancement of the river's Outstanding Remarkable Values and the preservation of its free-flowing condition and excellent water quality. Alternatives 2 through 6 have been designed to protect and enhance the values of the Merced River while allowing for appropriate kinds and amounts of recreational and other uses. Actions common to all alternatives will ensure that any management concerns or localized effects to ORVs are addressed (See "River Values and Their Management" [Chapter 5] and "Alternatives-Actions Common to Alternatives 2-6" [Chapter 8]), and that river values will continue to be free of adverse impacts or degradation. The plan includes a robust User Capacity Program to ensure that recreational and other public uses of the river corridor do not adversely affect river values. Protection of the river's esthetic, scenic, historic, archeologic and scientific features is also emphasized in "Alternatives" (Chapter 8). The Act does not require the NPS to prohibit all recreational use of the river corridor. In fact, the Act envisions that appropriate recreational activities will be allowed.

Concern 30: The NPS should retain recreational opportunities because they are part of the recreational classification of the Merced River in East Yosemite Valley.

One of the key components to the Merced River Plan is the protection of the Merced River which was protected as a "wild a scenic river". One key component in the rivers classification to obtain this protection, as stated by the courts however, is the fact that it's got a recreational component. That said, I'm curious as to why we are removing such a significant portion of all recreational activities on or near this river within the Valley. If it was meant to be enjoyed and experienced and holds such significant recreational value, which I agree it does, how can we take away the very things (rafting, bridges, biking, pools etc) that placed it in the category and helped classify it as such?

(Individual; Correspondence #152)

I think all the other alternative plans have gone way beyond what the Wild and Scenic River Act intends or requires. These non-wild/scenic river-related additional takeaways will ultimately be a detriment to visitors' full enjoyment of Yosemite.

(Individual; Correspondence #1283)

The plan's Abstract, it seems to me, highlights just how narrow minded the planning process has been in the sense of common sense. On the surface, it exclusively focuses on the Wild and Scenic River Act (WSRA) as one would think it should. However, acts, rules, regulations and guidelines are not created in a vacuum. There are implied conditions of context, existing values, and protection of public trust behind their enactment. The Park's suggestion to eliminate preexisting amenities, not envisioned for elimination when the river was designated wild and scenic, and which would measurably go against other acts for public use and enjoyment, albeit within the quantity and quality of recreation allowed, is out of order. WSRA must not be implemented blindly, as if in a vacuum.

(Individual; Correspondence #3490)

Response: Wild and Scenic river segments are classified, designated, and administered as either "Wild," "Scenic," or "Recreational" for management purposes. This classification is based on 1) whether there is or have been impoundments or diversions on the river; 2) the level of development present; and 3) the degree of accessibility to the river via roads. The classification of the river is distinct from the identification of ORVs, which are the special attributes of the river that make it worthy of inclusion in the wild and scenic river system. ORVs may be cultural, biological, scenic, scientific, or other values, such as recreational. A river segment with a recreational classification may or may not have a recreational ORV. By the same token, recreational ORVs may be found in river segments classified as scenic or wild. Because the recreational classification of a river segment is often confused with recreational ORVs, a section explaining the differences between these two has been added to "River Boundaries and Segment Classification" (Chapter 3) of the Merced River Plan / FEIS.

There are two river segments in Yosemite Valley. The portion of the river in East Yosemite Valley is classified as recreational. The segment in West Yosemite Valley is classified as scenic. A river segment's classification is only one aspect of the Wild and Scenic Rivers Act that informs the type and amount of facilities that are appropriate in the river corridor. The Act also requires river plans to address "development of lands and facilities." The Secretarial Guidelines, which interpret the Act, provide that major public use facilities will, where feasible, be located outside the river corridor. If a facility is necessary to provide for public use or resource protection and it is infeasible to locate the facility outside the corridor, the Secretarial Guidelines allow the facility to be located in the corridor if it does not adversely affect ORVs. This guidance applies to all three river segment classifications (i.e., wild, scenic and recreational).

The recreational segment of the river in East Yosemite Valley has a Recreational ORV which has been defined to include a wide variety of river-related pursuits such as hiking, floating and camping, as well as creative and educational pursuits. Alternatives 2 through 6 protect and enhance this ORV by allowing appropriate recreational pursuits to continue. To the extent that recreational and other uses are limited by the plan's alternatives, these limitations are based on the need to ensure that all of the river's outstandingly remarkable values and its free flowing condition are protected. Although these alternatives include some new constraints on visitor use in Yosemite Valley, each of these alternatives allows multiple opportunities for continued visitor use and enjoyment of river corridor.

Concern 31: The NPS should prioritize visitor preferences and the tourism economy over wild and scenic case law when determining which commercial activities should be allowed in the river corridor.

> *... in the often referenced "footnote five", the Park Service is asked to make a "conscious choice" with regard to which commercial activities should be allowed. Our Board believes that the choice should favor the general public instead of those few represented in the litigation and advice from your legal counsel. Fear of further legal action should not supersede what is best for the visitor experience and our tourism economy.*
>
> (Individual; Correspondence #1984)

Response: The Merced Wild and Scenic River Comprehensive Management Plan must comply with all applicable legal requirements, including the decisions of the U.S. Court of Appeals for the Ninth Circuit which found that prior versions of the plan were invalid. The plan presents five alternative approaches to improving the experience of the many visitors who come to Yosemite each year. Under Alternative 5 (Preferred) the experience of visitors would be enhanced by an increase in camping opportunities in Yosemite Valley, a reduction in congestion, and various other actions. Alternative 5 (Preferred) does not favor the interests of any one user group over another.

Concern 32: The NPS should consider de-designating the Merced River, either in the valley or in its entirety, as a Wild and Scenic River.

> *If the Merced River within Yosemite National Park and El Portal Administrative Site were excluded from the Wild and Scenic River system, the Organic Act would remain in place to protect river values. If de-designation by Congress of the Merced River would put an end to legal challenges and allow forward progress to be made, it may be the best alternative for the public and the National Park Service.*
>
> (Individual; Correspondence #2133)
>
> *This Plan is all about making the River conform to the definition of a Wild and Scenic River retroactively. If commercial services and activities conflict with the definition of a Wild and Scenic River even in Recreational segments, than the Merced River in the Yosemite Valley never should have been declared a Wild and Scenic River in the first place.*
>
> (Individual; Correspondence #2249)
>
> *"Wild and Scenic" just does not apply to the Merced River in the Valley. The river is not being degraded, and it's a complement to all the other features, but not the only focus. If a strict ruling on wild and scenic is applied to the Merced in Yosemite Valley, it is letting the tail wag the dog. It's just not appropriate.*
>
> (Individual; Correspondence #2261)
>
> *The portion of the Merced River that runs through Yosemite Valley is designated "recreational." However, you are treating it like it is "wild & scenic," by creating a river corridor and turning everything within the corridor back to wilderness. Yosemite Valley is not, and never has been a wilderness. ... There are other areas with Wild and Scenic Rivers that have undesignated areas, such as the Hetch Hetchy Dam, and the American River that runs through the middle of Sacramento.*
>
> (Individual; Correspondence #2325)
>
> *The Draft Master Plan as applied to Yosemite Valley is basically flawed. It is inappropriate and a basic error to apply regulations of the Wild and Scenic Rivers Act intended for portions of the river designated "wild" and "scenic" to the Merced River in Yosemite Valley, which has been designated "recreational" based on almost 150 years of recreational use. It is inappropriate to remove or relocate existing infrastructure or ban any traditional recreational activities in Yosemite Valley. The Merced River in Yosemite Valley should be removed from the Draft Master Plan, leaving the Plan applicable only to portions of the Merced River within Yosemite National Park designated "wild" or "scenic".*
>
> (Individual; Correspondence #2556)

[Of all the Wild and Scenic rivers managed by the National Park Service, only in Yosemite Vally has a court [Ninth Circuit through Footnote

(Individual; Correspondence #2956)

Response: The National Park Service does not have the authority to remove the Merced River or any portion of it from the Wild and Scenic Rivers System. De-designation of the river would require an Act of Congress. While the popular name of the Act is the "Wild and Scenic Rivers Act," the Act applies to three classes of rivers: wild, scenic and recreational. The portion of the river that flows through Yosemite Valley is divided into two segments. The segment of the river in East Yosemite Valley (from the top of Nevada Fall to Sentinel Beach) is classified as recreational. The segment of the river in the western portion of Yosemite Valley (from Sentinel Beach to the intersection of the El Portal Road and the Big Oak Flat Road) is classified as scenic. Because the provisions of the Wild and Scenic Rivers Act apply to wild, scenic and recreational river segments, the East Yosemite Valley segment must be included in the Comprehensive Management Plan. The types of facilities and activities that are proposed in the alternatives for East Yosemite Valley are consistent with the recreational classification of this river segment.

Concern 33: The NPS should relocate all facilities that can be feasibly located outside of the river corridor, as per the Secretarial Guidelines. Additionally, the NPS should not develop new facilities within the wild and scenic river corridor.

..., the Park also now proposes to construct a new campground with 40 car campsites plus 2 group campsites in what will be called the Eagle Creek Campground. - CSERC points out again that it is staggering to see what appears to be the total disregard by Park officials for the legal direction contained in the WSRA and the Secretarial Guidelines. To build a new campground (that would serve over 100 people with at least 50 vehicles) within the wild and scenic river corridor in Yosemite Valley cannot in any way be shown to be the only feasible solution for providing camping in Yosemite Park or for those visiting the Park to camp outside of the Park in underutilized national forest and private campgrounds.

(Individual; Correspondence #2210)

OUT OF THE MANY VIOLATIONS OF THE WILD AND SCENIC RIVERS ACT, THE MERCED RIVER PLAN'S PREFERRED ALTERNATIVE MOST BLATANTLY VIOLATES THE FACILITIES LIMITATION THAT ONLY ALLOWS FOR FACILITIES THAT ARE NOT FEASIBLY LOCATED OUTSIDE OF THE RIVER AREA AND WHICH ONLY ALLOWS FACILITIES WITHIN THE RIVER AREA IF THEY DO NOT HAVE AN ADVERSE EFFECT ON THE VALUES FOR WHICH THE RIVER AREA WAS DESIGNATED.

CSERC ASKS THAT THE FEIS ACKNOWLEDGE THAT ALTERNATIVE 5 DIRECTLY CONFLICTS WITH THE FACILITIES LIMITATION AS DEFINED IN THE SECRETARIAL GUIDELINES

(Individual; Correspondence #2210)

Under "C. WSRA Designation of the Merced," the Ruling also states that in designating the Merced as wild and scenic, Congress instructed any amendment of the 1980 GMP 'shall assure that no development of park lands shall be undertaken that is inconsistent with the designation of such river segments.' " CSERC believes that as these comments will emphasize again and again, the Preferred Alternative, the DEIS, and the Merced River Plan all allow for the continued degradation of river segments, and furthermore, the Preferred Alternative, the DEIS, and the Merced River Plan all allow for development that is completely inconsistent with the WSRA.

- CSERC asks that the FEIS acknowledge clearly that the construction of 56 (or more) new permanent buildings in the river corridor and the approved retention of so many existing facilities in the river corridor are both inconsistent with the Congressional designation language and also inconsistent with the 2008 Appeals Court ruling.

(Individual; Correspondence #2210)

Response: The constellation of facilities included in each of the action alternatives consists of the facilities and associated services that meet the requirements of the Secretarial Guidelines and that are consistent with the visitor experience and resource protection goals of each alternative. The process that the NPS used for determining whether facilities would remain in the river corridor is described in response to Concern Numbers 345 and 347. This process included an assessment of the feasibility of relocating facilities that were not needed to support public use or resource protection.

Concern 34: The NPS should identify major actions to reduce crowding beyond those related to transportation infrastructure in order to meet the WSRA non-degradation standard for the Recreational ORV in Yosemite Valley.

> *CSERC points out that our Center's staff has repeatedly, consistently, tirelessly expressed strong objections to the degraded visitor experience that has been allowed to be the norm over recent years during the bulk of the summer period when it is not just the vehicle congestion that causes too much crowding, but literally a shopping mall-type of crowding at Yosemite Falls, Bridalveil Falls, swinging bridge, trail to Vernal and Nevada Falls, Happy Isles, and many other overcrowded locations. Nothing in the Preferred Alternative will significantly improve or even assurance any improvement in the degraded quality of the recreation experience that now occurs in Yosemite Valley, especially the east half, during the peak visitation season. ... - Thus, the Preferred Alternative of this latest Merced River Plan is once again inconsistent with the intent of the WSRA as identified in the Court ruling, because it does not identify major actions that will reduce crowding and congestion separate from the traffic congestion of the road infrastructure.*
>
> *- Thus, the Preferred Alternative of this latest Merced River Plan is once again inconsistent with the intent of the WSRA as identified in the Court ruling, because it does not identify major actions that will reduce crowding and congestion separate from the traffic congestion of the road infrastructure. Accordingly, the Preferred Alternative should not be selected.*
>
> (Individual; Correspondence #2210)

Response: In discussing impacts to crowding, the MRP differentiates between direct impacts (encounters) and the evaluation of the impact (crowding, better described as "perceived crowding"). Crowding involves an individual's judgment about the acceptability of the number of other people encountered compared to their personal norms or expectations for a particular place. Social norms for density are usually lower for more remote, solitary areas and higher for front-country areas or areas near major attraction sites. Park managers reviewed Yosemite research and other studies done in similar settings to develop social standards for the various recreation sites. Social standards are sensitive both to the physical area and to the area's associated use patterns. More information on how the MRP manages crowding at attraction sites in Yosemite Valley and actions associated with the protection and enhancement of this ORV can be found in "River Values and their Management" (Chapter 5), ORV 20. Additionally, a discussion of how visitation, capacity, and recreation sites are related to one another is included in "User Capacity and Visitor Use Management" (Chapter 6) and examples of the analysis are included in Appendix S.

Concern 35: The NPS should monitor additional or different indicators to ensure river values and Biological ORVs are being sufficiently protected.

> *Suggest monitoring more than the three biological parameters in Yosemite Valley: fragmentation of meadows due to informal, social trails; riverbank condition; and the abundance of five native bird species (four of which are neo-tropical migrants) to ensure protection of biological ORVs. This suite of indicators is not inadequate, will not identify all changes (for better or worse) in Valley meadows and riparian zones, and is not fully representative of all the important parameters in these habitat types. For example, they will not tell us if plant species composition is changing toward more non-native species, or if we are losing native sedges, or if we are losing important soil invertebrates in meadows, or if there are disruptions in the*

aquatic food chain, or if we are losing special-status bats. ... This monitoring effort is the most important element in this plan. If specified user capacity limits are too high, and too little is done to remediate past impacts, the ORVs will undoubtedly suffer. Monitoring must be able to identify this suffering in its earliest stages so the damage can be addressed, remedied, and reversed. I doubt that the limited ORVs and the proposed monitoring program will accomplish this critical mission.

(Individual; Correspondence #2273)

The NPS does other monitoring for some of these elements; the draft should describe these other efforts and explain how WSRA monitoring will complement existing programs.

(Individual; Correspondence #2273)

Response: The three biological indicators selected for Yosemite Valley represent the metrics selected by a team of park scientists, collaborating university researchers, and subject matter experts. They were specifically chosen to monitor and protect the values outlined in the Biological ORV for Segment 2. Indicators are meant to represent a key component of an ecological system that can 'indicate' trends in that system. Following the guidance of several adaptive management monitoring programs, the NPS has selected indicators that are measurable, repeatable, can significantly detect change and can act as a means to show trends in the systems they represent. The purpose of the selected indicators is to identify if impacts are occurring. Because operational constraints make monitoring of every component of a given ecosystem unrealistic, indicators were carefully chosen to represent these systems. The indicators are designed to trigger actions well before a standard is reached. In many cases, this trigger will cause additional assessment tools to be put into place. Such secondary assessments could be more specific to species composition or other variables. The indicators only represent a small portion of the monitoring and research that occurs in order to protect the sensitive meadows and riparian resources in Yosemite Valley. This other ongoing work will continue to be done in collaboration with data collection on the specific indicators addressed in the plan.

Concern 36: The NPS should dismiss actions called for in the Merced River Plan DEIS that are inconsistent with the original intent of the Wild and Scenic Rivers Act.

The Merced River Plan is Not what the American Public wants nor is it what the Wild & Scenic River Act envisioned, it is a product of a Court mandate. The Rivers and Yosemite National Park is better off today. This argument is not about protecting the Wild and Scenic Rivers, but in stopping commerce and access.

(Individual; Correspondence #1586)

... the decision to remove the services and recreational opportunities discussed above reflects a bias against commercial services and a trend to adopt a more wilderness-recreational atmosphere in Recreational segments of the river, which we believe is inconsistent with the spirit and intent of WSRA ... retention of these services would be beneficial to the visitor experience and contribute to the enhancement of the Recreational ORV and such services commonly remain along other Wild and Scenic Rivers.

(Business; Correspondence #2819)

Response: Both the WSRA and the 2009 Settlement Agreement require the NPS to complete a legally valid Comprehensive River Management Plan for the Merced River. The WSRA requires that the NPS adopt specific, measurable limits on use to protect and enhance the river's Outstandingly Remarkable Values. Each alternative presented in the plan includes a suite of measurable limits on visitor use to ensure that ORVs will remain in a protected state. The limitations on visitor use presented in Alternative 5 (Preferred) were carefully designed to allow appropriate levels and types of use while ensuring the long term protection and enhancement of ORVs. The Alternative 5 (Preferred) does not restrict public use in Yosemite Valley to

only wilderness compatible uses, nor does it prohibit commercial activities. For example, it continues to allow private vehicle access to Yosemite Valley and it retains many structures to accommodate visitor use, including facilities and services that would be managed by the park's primary concessioner.

Concern 37: The NPS should use criteria consistent with managing recreation actions as presented in other river plans, including the BLM-administered plan for the South Fork of the Merced River.

> *"The South Fork and Merced Wild and Scenic River Implementation Plan" for the Merced River just outside Yosemite. This plan, which is a joint plan between the DOI and the BLM and subject to the same provisions of law as described in footnote 5(16 U.S.C. § 1271), has far less restrictive provisions. This plan includes the following criteria in managing the recreational segment of the river:*
>
> - *Provide a variety of recreational activities to fit a diverse range of visitors.*
> - *Maintain a diversity of river and land based recreation activity opportunities and emphasize the combined activities of driving for pleasure, camping, fishing and floating.*
> - *Allow recreation activities that are shown to have the least impact on the environment.*
>
> *It appears that the wording of footnote 5 is driving many of these actions, albeit inconsistently, and not at all clear that these actions are consistent with the intent of Congress as embodied in the WSRA.*
>
> (Business; Correspondence #2818)

Response: See response to Concern 36.

Concern 38: The NPS should clarify the criteria for which it defines the Cultural and Historic Resources ORVs and the rationale for changes over time.

> *Why are historic/archaeological sites outside the Merced River corridor being included as an ORV [ORV 9] when that was not the case with the TRP? Why are many sites being included when previous ORV reports noted that they were not river-dependent or river related? If the NPS felt that such a broad application of ORV5 would not be useful in guiding river management in Tuolumne, how does the NPS propose to guide river management for the Merced with these broad ORV5?*
>
> (Business; Correspondence #2819)
>
> *The current MRP's Cultural ORV for Segment 2 has greatly expanded to encompass many of the Valley's NRHP historic resources. Now a large representation of the Yosemite Valley Historic District, and the entire Yosemite Valley, Wawona and El Portal Archaeological Districts are ORV's of the river. We noted that this was very inconsistent from the NPS approach to the Cultural ORV5 of the Tuolumne River Plan (TRP) ...*
>
> (Business; Correspondence #2819)

Response: After the publication of the DEIS, the NPS reconsidered the criteria for the Yosemite Valley Historic Resources ORV. This ORV now includes "three National Historic Landmarks (the Ahwahnee Hotel, the Rangers' Club and the LeConte Memorial Lodge), as well as the Yosemite Valley Historic District (comprised of three historic developed areas [the Ahwahnee Hotel developed area, Camp Curry, and Yosemite Village], numerous sites, and broad-scale landscape characteristics)," recognizing that "the river and its associated riverine corridor (including riparian zones and meadows) are the primary natural systems that have historically shaped the built environment of Yosemite Valley." It further contends that "Because the historic district is one complete whole, the ORV includes those components that extend beyond the ¼-mile Merced wild and scenic river corridor." The Yosemite Valley Historic Resources ORV was added in 2013 to recognize the significance of this exemplary river-related historic landscape and to better protect it in its entire context along the Merced River corridor. It was updated between the DEIS and FEIS to reflect the entire Yosemite Valley Historic District as an interconnected and inherently river-related resource.

Changes to the ORVs from 1986 when the river was originally designated wild and scenic to the present are diagrammed in Appendix M.

Concern 39: The NPS should describe 1987 baseline conditions, including the disclosure of impacts that occurred prior to recent baseline studies, and identify additional actions to address these impacts.

> *After the Merced was designated a Wild and Scenic River in 1987 and before the Merced Wild and Scenic River planning process was initiated the National Park Service commenced its largest construction projects in the El Portal Administrative site to date. These included a combination of connected structures known The El Portal Maintenance and Administrative Complex. By the time all phases of construction were completed the total area exceeded 115,000.square feet plus another 20,000 square feet of outdoor storage, as well new paved roads and parking. The south side of the complex is within 100 meters of the river bank, which makes it highly visible from scenic highway 140. Within this same period 7 two story apartment complexes were built at Rancheria Flat adding another 60,000 square feet to the river corridor. In addition 18 new single family home were built amounting to about another 30,000 square feet of development, as well 3 new paved streets and another 12,000 square feet of parking. ... All this was done by the federal land management agency in charge of planning for future protection of the river.*
>
> (Individual; Correspondence #2856)
>
> *In segregating its discussion of ORVs from its analysis of the NAA and action alternatives, NPS has missed an opportunity to identify areas with substantial degradation, and examine additional enhancement and restoration measures that take into account changes to the River corridor between its 1987 designation and the most recent baseline studies. NPS has departed impermissibly from the Interagency Wild and Scenic Rivers Coordinating Council's recommendation that it "establish the baseline conditions at the time of designation' including a description of any degradation'and propose[] management actions that will be taken to improve conditions until they meet the requirement to protect and enhance the river's values." (As quoted at DCMP/EIS 5.9, emphasis added). NPS must rectify this omission.*
>
> (Civic Group; Correspondence #2945)
>
> *... the ORV Baseline Condition Assessment Report uses a variety of dates from which to compare conditions, making the environmental baseline yet unclear. Whatever the Court may have ruled about allowing or enjoining some of the many projects since 1987, it cannot be disputed that these projects did significantly impact the Merced River Corridor in the absence of a Plan. Some examples worth consideration in the DEIS include: widening and realignment of the El Portal Road and later Segment D widening; the Utilities Project; the Yosemite Falls Project; removal of the gas station; closure of campgrounds; construction of Curry Employee Housing; construction of temporary employee housing; the Curry rockfall of 2008 and subsequent cabin closures; removal of Cascades Dam; the Offices construction at El Portal; and of course Camp 6, discussed above. A few of these projects were beneficial to the River Corridor, but many were very damaging. Whether or not we agree with any of these projects, we think their impact on the river corridor since 1987 should be discussed in the DEIS.*
>
> (Individual; Correspondence #3693)

Response: The IWSRCC's guidance for comprehensive management plans addresses the importance of describing baseline ORV conditions, identifying any degradation that may be occurring, and proposing actions to improve degraded conditions. In keeping with this guidance, "River Values and their Management" (Chapter 5) describes the baseline condition of each river value in a section entitled "Condition at the time of Designation." Chapter 5 also describes the current condition of each river value in a section entitled "Current Condition." Chapter 5 then presents a suite of measurable indicators and standards that will be used to determine whether each river value is free from adverse impact and degradation. Having established measurable standards, Chapter 5 discloses whether there are any existing adverse impacts or instances of degradation affecting river values. If there are, these are classified as

"management concerns." For those ORVs where management concerns exist, Chapter 5 identifies specific actions that the NPS will take to restore the river value to a protected and enhanced state. These actions are then incorporated into the alternatives presented in "Alternatives" (Chapter 8) of the plan. In addition, each existing public use facility was evaluated in "Development of Lands and Facilities" (Chapter 7) to determine whether it 1) can feasibly be relocated out of the river corridor, and 2) if it cannot be relocated, whether it is necessary for public use or resource protection and can be maintained without adverse effects on river values. As described above, any localized concerns resulting from retained facilities will be addressed under all action alternatives (See "Alternatives-Actions Common to Alternatives 2-6" [Chapter 8]).

Concern 40: The NPS should not increase user capacity as proposed under the preferred alternative because this does not achieve the mandate of the WSRA to provide a user capacity that does not degrade river values.

> *Increasing the maximum PAOT from 16,483 under the No-Action Alternative to 18,151 under the Preferred Alternative does not achieve the goal of the WSRA to provide a user capacity that does not degrade the values for which the river was designated. The management standard set for ORV 20 in Segment 2, River Related Recreation, is not presently being met according to the parking indicator, and an increase in PAOT can only degrade conditions even farther from this management standard. A user capacity that requires construction of new facilities in the river corridor that have adverse impacts inherent in their construction and existence, especially construction of concessioner employee housing to support commercial uses, should be considered a degradation of the values for which the river was designated.*
>
> (Individual; Correspondence #2211)

Response: The premise of this concern statement is that individual elements of the plan's User Capacity program can be looked at in isolation to determine whether there will be degradation of river values. The National Environmental Policy Act (NEPA) requires environmental impact statements to consider a range of alternatives. Each of the plan's action alternatives includes a suite of User Capacity measures, an array of restoration actions, and hundreds of facility-based actions. These various elements work synergistically to achieve WSRA's mandate to protect and enhance river values. PAOT (People at One Time) values are not relied upon in isolation to protect and enhance ORVs. Alternatives produce different conditions by combining different user capacities, infrastructure, and related programs of management actions. All protect river values, as required by WSRA, but have different goals for visitor experience and produce varying degrees of river value enhancements. Higher use alternatives have higher levels of infrastructure and more intense management to accommodate the use without unacceptable impacts, while providing opportunities for more visitors. Lower use alternatives require less infrastructure and management, and offer more opportunities for restoration, but provide opportunities for fewer visitors.

Concern 41: The NPS should not use CRAM as a tool for achieving compliance with the WSRA because CRAM is a monitoring program and is an inadequate tool to establish user capacities or appropriate land use management.

> *The WSRA mandates that NPS develop a CMP that "provide[s] for the protection of the river values" of each segment of the River. The WSRA also states that this CMP "shall address resource practices necessary or desirable to achieve the purposes of this chapter." 16 U.S.C. 1274(d). NPS utilizes the California Rapid Assessment Method ("CRAM") for this purpose. But CRAM is an inadequate tool for achieving compliance with this mandate. CRAM is a monitoring program. It does not establish user capacities, land use zones, or otherwise determine appropriate land management. CRAM does not establish numerical limits. As NPS states, it is "intended to provide a general condition index of riparian and wetlands sites using a combination of landscape, hydrology, physical, and biotic structure scores." DCMP/EIS 5.47. ... NPS' insistence on using such a defective tool to evaluate its management measures*

> *is inexcusable. ... In spite of CRAM's obvious flaws, NPS relies on CRAM to function as the baseline for environmental degradation throughout the Merced River area. DCMP/EIS 5.22 (subsequent monitoring of riparian conditions tied to CRAM), 5.42 (relied on to indicate meadow recovery), 5.45 (establishing baselines), 5.47, 5.48 (management and degradation standards), 5.49 (monitoring standards and triggers), 5.64-68 (indicators for geological and hydrological ORVs), 6.20-21 (user capacities), 8.290 (monitoring of riparian conditions).*
>
> (Civic Group; Correspondence #2945)

Response: CRAM is used as a monitoring protocol specifically to protect the Biological ORV associated with the riparian health of the Merced River in Yosemite Valley. CRAM will be used as a tool to assess the status of the riparian corridor because it will allow the NPS to monitor and assess the specific, measureable limits established in the riparian health condition indicator.

CRAM is sufficiently sensitive to identify poor, moderate, and good conditions at the 200-meter river reach scale as shown in Cardno-ENTRIX (2012). Through CRAM, the NPS will track the effects of restoration actions and other actions outlined in Alternative 5 (Preferred). The CRAM score for riparian condition is being used as only one component of the management program for the Biological ORV in Segment 2 (Yosemite Valley). Other components of the management program include the Meadow Fragmentation due to Proliferation of Informal Trails Indicator and the Riparian Bird Abundance Indicator. Each indicator defines quantitative measures for two trigger points, management standards, adverse impact, and degradation.

The monitoring results from CRAM and other indicators will provide information about visitor use and behavior in riparian and meadow areas. Together, these data will enable the NPS to ensure that user capacity limits are protective of ORVS. If monitoring reveals that trigger points are reached, the NPS will act as defined in the plan to reverse the negative trend before adverse impact occurs. CRAM scores as described in the 2012 Cardno-Entrix report indicate that the proposed second trigger point has been reached. The NPS has identified "Required Management Actions" to this proposed trigger point in the plan.

Concern 42: The NPS should apply consistent criteria when evaluating the potential removal of facilities along all river reaches.

> *... it is not clear why the requirements of footnote 5 have not been extended to the river corridor on the South Fork of the Merced through Wawona, but they have not.*
>
> (Business; Correspondence #2818)

Response: Consistent analysis criteria have been applied to all facilities in all river segments, and are described thoroughly in “Development of Lands and Facilities” (Chapter 7).

Concern 43: The NPS should not remove services and facilities from Yosemite Valley because it would set a damaging precedent for other WSRs, and preclude the designation of new wild and scenic rivers.

> *Of all the Wild and Scenic rivers managed by the National Park Service, only in Yosemite Vally has a court [Ninth Circuit through Footnote 5] decided that the designation of "recreational" really means "wild" in seeming direct conflict with the original Act. We further fear that application of this mandate will spell the end to any further W&S designations in the country. What community would agree to having their recreational and economic lifeblood turned into, essentially, a museum piece? How is it that 23 miles of the Wild and Scenic American River flows directly through the city boundaries of Sacramento? It is designated under the same Act and clearly the framers did no expect a 1/2 mile wide swath of the city's development to be removed... this action [removal of the swimming pools], as well as the removal of the tennis courts at the Ahwahnee Hotel, seems totally incongruous with the W&S*

> *designation of "recreation" for the Valley section of the Merced and provides no additional enhancement for the river.*
>
> (County Government; Correspondence #2956)

Response: The NPS does not believe that the decisions reflected in Alternatives 2–6 represent a harmful precedent. The alternatives present a range of options for fulfilling the mandates of the Wild and Scenic Rivers Act. Any concerns about the effect of this plan on the future designation of rivers as wild and scenic is purely speculative.

Concern 44: The NPS should state which locations will be monitored to ensure the protection and enhancement of the Recreational ORV in Segment 2.

> *MERG is concerned that the lack of definition of "location" in Table 5-39 as well as the lack of specificity in the definition of Primary Viewing Areas in Table 5-38 makes it impossible to understand the potential effectiveness of the proposed management actions designed to control user capacity.*
>
> (Individual; Correspondence #8330)

Response: In the *Final Merced River Plan/EIS,* the NPS has clarified and articulated both the number of sites and the location of sites that will be monitored to ensure the protection and enhancement of the Recreational ORV in Segment 2. These sites can be found in "River Values and their Management" (Chapter 5) under the monitoring section of ORV20. The NPS has also clarified the monitoring interval and the time of year the sites will be monitored.

Concern 45: The NPS should clarify the monitoring methodology for the Recreational ORV to specify 1) when monitoring will commence, 2) whether the interval is a running interval or whether it includes a particular three-year period and begins again.

> *The Draft MRP does not state when monitoring will commence or whether the 3-year interval is a running 3-year interval or whether it includes a particular 3-year period and then begins again. ... It also does not commit to monitor on the highest use-level days during the summer, when exceedances are most likely to occur.*
>
> (Individual; Correspondence #8330)

Response: Please see response to Concern 44.

Concern 46: The NPS should take management action before three years of exceedances occur to the Recreational ORV.

> *if visitation increases, and in the first year of monitoring there are multiple exceedances more than 10% of the time, the Draft MRP implies that NPS can wait for a full three years before considering management action. The Draft MRP does not provide any analysis as to how 3 years of exceedances will protect the river's values. ... to address exceedances of user capacities, there has to be adequate monitoring to identify when capacities are exceeded in the absence of a day-use permit system or a gate closure system. There does not appear to be any monitoring related to segment-wide user capacities or river area visitation.*
>
> (Individual; Correspondence #8330)

Response: The NPS has specified a range of management actions that could be taken if trigger points are exceeded at one or more monitoring locations. The time frame specified for all triggers is less than three years. For a complete discussion of the Recreational ORV, including trigger points and their associated management actions please see Recreational ORV20 in "River Values and their Management" (Chapter 5).

Concern 47: The NPS should consider the West Valley (2B) scenic segment and the East Valley (2A) recreational segment separately in terms of development, user capacities, visitation, and ORV impacts.

> *... the fatal flaw with the DEIS is that the analysis of impacts from Alternative 5 to scenic resources, for example, makes no distinction between Recreational and Scenic segments for the Merced River's Segment 2: Yosemite Valley, as though any proposed recreational development would be consistent with protection of the Scenic ORV and the Scenic river segment (Draft MRP, at 9-793). It then summarily states that there would be an overall improvement in the scenic quality of the segment, with no discussion as to how new development and construction of a campground and a 100-space parking area will not likely affect the Scenic values (as well as other ORVs) of the West Valley segment.*
>
> (Civic Group; Correspondence #8330)
>
> *In fact, one of the major shortcomings of the DEIS is that River Segments 2a and 2b, in Yosemite Valley, are considered as a single area for the distribution of facilities and the management of visitation when, in fact, the East Valley is classified as Recreational and the West Valley has the more restrictive classification of Scenic under the WSRA. We believe that, to meet the requirements of the Settlement Agreement, the West Valley (2b) and the East Valley (2a) should be considered separately in terms of development, user capacities, visitation and ORV impacts.*
>
> (Civic Group; Correspondence #8330)
>
> *... the plan fails to evaluate the valley's Scenic and Recreational river segments separately. East Yosemite Valley is a Recreational river segment, while West Yosemite Valley is classified as Scenic, which means it is more primitive and relatively undeveloped, with roads, but not other significant kinds of recreational development. West Yosemite Valley, as a Scenic river segment should certainly have its own overnight, day-use and administrative use capacities established and should not be comingled with the user capacities specifically set for the East, highly developed, end of the Valley. ... Given that NPS has a stated intent to establish user capacities by river segment, it is arbitrary to combine the West Valley segment with the East Valley segment, without a separate rational basis, especially when the West Valley segment is classified Scenic, with little development, compared to the highly developed East Valley, classified Recreational.*
>
> (Civic Group; Correspondence #8330)
>
> *The West Valley, Segment 2b, should be analyzed as a separate segment of the River from the East Valley and its user capacity determined as appropriate for the more restrictive classification of Scenic under the WSRA. MERG believes that, to meet the requirements of the Settlement Agreement, the West Valley (2b) and the East Valley (2a) should be considered separately in terms of development, user capacities, visitation and ORV impacts. Only then can it be determined whether the current level of development in the West Valley is appropriate, let alone any proposed development.*
>
> (Civic Group; Correspondence #8330)

Response: Segment 2A (East Valley) and Segment 2B (West Valley) have historically different development patterns and their segment classifications reflect this. The patterns of use and transportation system within Yosemite Valley are such that it is difficult to completely separate these two segments in terms of user capacity calculations. Although use densities and encounter levels in the West Valley will be lower than in the East Valley, the NPS is not mandated to develop separate capacities for the two segments. All East Valley users must pass through the West Valley, and much of the use in West Valley comes from those based in East Valley (either overnight visitors or visitors parked in day-use parking). However, to aid in the understanding of the different use patterns and development objectives for Segments 2A and 2B, "User Capacity and Visitor Use Management" (Chapter 6) has enumerated user capacities for Segments 2A and 2B separately when it is feasible and appropriate (i.e. in the cases of overnight lodging or parking). For example, in the Segment 2 discussion in Chapter 6, a summary of user capacities is provided across alternatives. This table (Table 6-4) provides the POAT numbers for East Valley (2A) and West Valley (2B) both independently

and together. Thus a reader can see that in the preferred alternative there are 7,711 overnight PAOT in East Valley and 120 PAOT overnight in West Valley for a total of 7,831 overnight in Segment 2.

Though the user capacity calculations for East and West Valley are interrelated, the management of these segments varies based on their segment classifications. For example, lower-density attraction sites in the West Valley will be managed for different standards to provide different visitor experiences than those at higher-density attraction sites in the East Valley. This can be seen in the comparison of boats at one time (BAOT) standards for ORV20. In East Valley where there is more use, the site-level standard is set at 14 BAOT, in contrast to the West Valley boating where there is less proposed use and the standard is set lower at 6 BAOT. For a full discussion of monitoring efforts please see "River Values and their Management" (Chapter 5).

Concern 48: The NPS should not construct any additional campgrounds or development in the scenic West Valley segment of the river corridor.

> *The Sierra Club also opposes the Preferred Alternative's plan for a new campground at Eagle Creek in West Valley. West Yosemite Valley has remained undeveloped, other than roads and picnic areas, since John Muir and Teddy Roosevelt met there in the early 1900's. It is the only place in Yosemite Valley where visitors can enjoy a natural experience and views, without the obtrusion of campgrounds, buildings, and parking lots. Therefore we oppose any further development in West Yosemite Valley, because development would not protect and enhance its Outstanding Remarkable Values.*
>
> (Individual; Correspondence #1818)
>
> *We oppose development in West Yosemite Valley including the proposed Eagle Creek campground. Keep West Yosemite Valley as it is now.*
>
> (Individual; Correspondence #2070)
>
> *I do not believe we need to have any additional development in the West Yosemite Valley and this would include the development of the Eagle Creek Campground.*
>
> (Individual; Correspondence #2118)
>
> *The Access Fund appreciates that Alternative 5 would expand camping opportunities in Yosemite Valley, and we understand the utility of establishing an overflow parking lot at the El Cap Crossover which is the last option for drivers to turn around during peak visitation (especially those arriving from the south on Highway 41). However, we are concerned by the proposals for new developments in the West Valley, a location which is currently undeveloped and represents one of the most iconic climbing viewsheds in the world.*
>
> (Individual; Correspondence #3689)
>
> *First, the proposed new developments in the West Valley, the Scenic river segment 2b, are not consistent with past park management practices and agreements, and are not consistent with the Scenic classification under the WSRA.*
>
> (Unaffiliated Individual; Correspondence #8330)

Response: The final preferred alternative, Alternative 5, does not include campgrounds or other forms of development in the West Valley. The West Valley overflow or staging area and Eagle Creek campground, both proposed in the preferred alternative of the *Draft Merced River Plan/EIS*, have been withdrawn from the *Final Merced River Plan/EIS*, as suggested by the representative quotes. Minor site improvements (such as boardwalks and trail improvements) may occur to protect natural resources in meadows.

Purpose and Need—WSRA Elements (Boundaries)

Concern 49: The NPS should clarify the extent of the river corridor boundary.

> *I would like some clarification on the terminology. The documents define an area of one quarter mile on either side of the river as one kind of boundary. Another term used is the "Merced Corridor". Is this the same thing or different.*
>
> (Individual; Correspondence #327)
>
> *Finally, the alternative plans consider the restoration extending 100 feet from the river to as large and area as the 100 year floodplain. It seems like there is clarification needed. What constitutes the limits of the "corridor"?*
>
> (Individual; Correspondence #327)

Response: The Merced River Corridor referred to throughout the document is the maximum river corridor boundary permissible under the Wild and Scenic Rivers Act—320 acres per linear mile, or a quarter mile on either side of the river, measured from the ordinary high water mark. The boundary defines the limits of the corridor, and these terms (boundary and corridor) may be used interchangeably in the document. This is a legal boundary.

Depending on the alternative, the proposed actions move development from within 100 feet of the ordinary high water mark of the river and up to the 100-year floodplain to allow for varying levels of restoration. These development setbacks are based on distances from the river or the extent of natural floodplains.

Concern 50: The NPS should revise the boundary of the Merced Wild and Scenic River corridor to include less of the developed area in East Yosemite Valley.

> *It is my understanding that the managing agency is permitted to establish the river corridor boundary, and that to date, the NPS has delineated the boundary in all segments of the Merced at the widest distance allowed under the WSRA. Short of de-designation, perhaps an adjustment of the river corridor boundary consistent with the provisions of the WSRA would be appropriate. Again, the Organic Act and other applicable statutes would continue to provide legal protection against degradation of any area that would be removed from the Wild and Scenic River corridor.*
>
> (Individual; Correspondence #2133)
>
> *A compromise between the sensitive river bank area and recreational uses within the ½ mile zone can be accomplished to protect of the Merced River. Federal legislation is an avenue to pursue. What makes common sense: a maximum artificial line or a more reasoned flood line?*
>
> (Individual; Correspondence #2216)
>
> *the public and park would be best served if the NPS chose to designate the minimum width through Yosemite Valley for the W&S corridor (average 3 year high water mark) instead of the maximum (1/4 mile on each side of the river banks). Clearly the designation of a 1/2 mile wide exclusionary zone through the center of Yosemite Valley leaves little space outside of rock fall zones for visitor services. ... This Board believes that both the river values and the visitor experience can be preserved by designating the minimum -width W&S corridor through Yosemite Valley, rather than the maximum.*
>
> (County Government; Correspondence #2956)

Response: When establishing a river corridor boundary, managing agencies consider the location of Outstandingly Remarkable Values and the ability of the boundary to protect the river's free flowing condition and water quality. In earlier versions of the Merced River Plan, the NPS considered narrower boundaries for certain river segments including Yosemite Valley and El Portal. The NPS's proposal to adopt a narrow boundary for the El Portal segment was challenged in court and found to be inconsistent with the

Wild and Scenic Rivers Act. Thereafter, the NPS adopted an expanded boundary for the El Portal segment that included all land within a quarter mile of each side of the river, consistent with all of the other river segments. As explained in "River Boundaries and Segment Classifications" (Chapter 3), the NPS believes that a boundary encompassing one quarter-mile on each side of the river is appropriate for each segment, regardless of classification.

Purpose and Need—WSRA Elements (Classifications)

Concern 51: The NPS should prioritize the preservation of recreational opportunities in Yosemite Valley over strict adherence to the WSRA.

> *It seems to me that due to the unique ORVs of the Merced River as it flows through the Yosemite Valley, this portion of the Merced River should be exempt from strict adherence to the WSRA. Since it is a river that flows through a national park, I think that preserving recreation opportunities for visitors takes precedence over the Wild and Scenic qualities.*
>
> (Individual; Correspondence #1982)
>
> *I believe it is worth the extra effort to get Congress, if necessary, to exempt the portion of the Merced River that does not qualify as "wild and scenic" from the Merced River Plan. It is wise to protect the river, banks, fisheries, and use in such ways as do not further impinge on its sanctity and beauty as part of an inspiring world heritage.*
>
> (Individual; Correspondence #3326)

Response: Congress designated the 81 miles of the Merced River that flow through Yosemite National Park as a component of the National Wild and Scenic Rivers System. As a component of the system, the NPS is mandated to complete a legally valid Comprehensive River Management Plan for the river and to manage the river in accordance with WSRA. Only Congress can exempt the NPS from the planning requirements of the WSRA.

The alternatives in "Alternatives" (Chapter 8) present different approaches to meeting the requirements of the WSRA. Alternatives 2–6 would each protect and enhance ORVs including the Recreational ORV. However, not every type of public use that occurs in the Merced River Corridor is included as part of the Recreational ORV. The Recreational ORV for Yosemite Valley encompasses river-related recreational pursuits that allow visitors to directly connect with the river and its environs amidst the spectacular scenery of Yosemite Valley. Recreational activities that are part of the Recreational ORV include active pursuits such as hiking, biking, swimming, floating and water play, climbing, camping, or fishing; creative pursuits such as writing, painting, photography, and other arts; and educational and interpretive pursuits such as attending ranger-led walks and programs. These experiences allow visitors to immerse themselves in their surroundings, taking in the sights, sounds, and feel of the river and its dramatic backdrop. The recreational pursuits that comprise the Recreational ORV would be preserved in Alternatives 2–6.

Concern 52: The NPS should more thoroughly detail how the Merced River's segment classifications were decided for this version of the Merced River Plan.

> *NPS should reevaluate management zones with the goal of optimizing protection of ORVs. Segment classifications, in particular, establish NPS's management standards. DCMP/EIS 5.111 ("management standard is defined according to river segment classification"). For the NAA, "segment classifications would be the same as those in the 1982 National Rivers Inventory in which the river was designated wild and scenic." DCMP/EIS 8.13. NPS omits any discussion of the decision-making process it undertook to determine the segment classifications for the River. ... NPS acknowledges that it has simply recycled the segment classifications used in previous CMPs. DCMP/EIS 3.1. But those CMPs were invalidated by the*

courts and may not be resurrected now. ... NPS should also expand wild zones to encompass other zones with a low degree of visitor use and facility development. Preserving existing wild zones, and expanding upon them, will insure that ORVs are adequately protected. Similarly, zones allowing a moderate range of visitor use and facility development should be managed in such a way that at least some portion of these zones can one day be restored to their former wild condition. See 16 U.S.C. 1281(a) (requiring "a nondegradation and enhancement policy for all designated river areas, regardless of classification.")

(Civic Group; Correspondence #2945)

Response: The approach that NPS used to determine segment classifications for the various segments of the river is contained in "River Boundaries and Segment Classification" (Chapter 3) of the plan. Additional information has been added to Chapter 3 explaining the basis for each river segment's classifications.

Concern 53: The NPS should not remove any recreational facilities from Yosemite Valley because it is inconsistent with the recreational classification of the river segment.

The people of Mariposa County understand that park managers have been severely constrained by the 9th Circuit ruling and Footnote 5, which call on the NPS to explain how maintaining such services protects or enhances the river's unique values. If recreation is the value, not being able to experience it is certainly a loss. That will be the case for the many thousands of visitors impacted by the removal of the above opportunities.

(County Government; Correspondence #2956)

Of all the Wild and Scenic rivers managed by the National Park Service, only in Yosemite Vally has a court [Ninth Circuit through Footnote 5] decided that the designation of "recreational" really means "wild" in seeming direct conflict with the original Act. We further fear that application of this mandate will spell the end to any further W&S designations in the country. What community would agree to having their recreational and economic lifeblood turned into, essentially, a museum piece? How is it that 23 miles of the Wild and Scenic American River flows directly through the city boundaries of Sacramento? It is designated under the same Act and clearly the framers did no expect a 1/2 mile wide swath of the city's development to be removed... this action [removal of the swimming pools], as well as the removal of the tennis courts at the Ahwahnee Hotel, seems totally incongruous with the W&S designation of "recreation" for the Valley section of the Merced and provides no additional enhancement for the river.

(County Government; Correspondence #2956)

Response: Please see response to Concern Statement 30.

Concern 54: The NPS should refine the facilities analysis to distinguish between facilities that are truly necessary to support public use and those that are merely desired for convenience by the visiting public, and only retain those necessary facilities that cannot be relocated outside of the river corridor.

we believe it is imperative that the Park distinguish between "desired by some segment of the recreating public" and "necessary" when it comes to facilities and uses proposed for retention within the river corridor. ... the Park cannot justify satisfying visitors' desires for lodging, recreation, or other visitor-serving facilities if those facilities create any significant negative impact that fails to protect and enhance the values which caused it to be included as Wild and Scenic, especially when those facilities could be located outside of the river corridor. ... a court will judge that a facility, use, or operation is not "necessary" when it simply fills desires of visitors who prefer convenience in contrast to a more direct experience with wild nature. The Park's socioeconomic consultant stated clearly at the Socioeconomic Workshop in the Yosemite Valley auditorium that if lodging or some other use is not provided INSIDE the Park, private interests will respond to the market need and provide the desired lodging or use OUTSIDE the Park.

(Individual; Correspondence #2207)

Response: Facilities deemed necessary for public use must be determined for each wild and scenic river area with reference to the particular resource and other concerns specific to that area. Because the Merced Wild and Scenic River is located in Yosemite National Park, the foundation for decisions regarding the kinds of facilities that are necessary for public use was the park's General Management Plan (GMP), along with NPS Management Policies (2006) and relevant information about natural hazards, visitor use, land availability, and fiscal constraints. The GMP intended to resolve questions about necessary facilities and serves as "the basic foundation for decision-making" within the park. Under NPS policy, the purpose of a GMP is to identify "the kinds and levels of management activities, visitor use, and development that are appropriate for maintaining the desired conditions" of resources and "that will best fulfill the purpose of the park." The GMP helps to define what is "necessary" for the Merced River Corridor within Yosemite National Park. As shown in Table 7-1, the Merced River Plan exhibits a high degree of consistency with the facility and development decisions of the GMP. Many of the facilities that are removed in the GMP are also removed in this Merced River Plan. "Feasible" is defined in this Plan as "capable of being done, accomplished, or carried out; possible, practicable." The NPS considered economic and technical constraints in addition to resource and safety hazards in making a determination as to whether or not a facility could feasibly be relocated out of the river corridor, also presented in detail in Table 7-1.

Purpose and Need—WSRA Elements (ORVs)

Concern 55: The NPS should not remove facilities or services unless they adversely impact ORVs.

> *The hurtle that needs to be met is to remove activities which clearly detract from the Outstanding River Values. Your organizations' plan removes items which neither add nor detract from the river but rather happen to be located within a specific distance from the river. This flawed assumption leads to the removal of activities which are specifically supported by your own organizations' Call to Action. These activities such as river rafting, bike rentals and horseback riding are the exactly what our forefathers envisioned when they set aside these lands for future enjoyment.*
>
> (Individual; Correspondence #1671)
>
> *Further, none of these activities [river rafting, bike rentals and horseback riding] detracts from the Outstanding River Values.*
>
> (Individual; Correspondence #1671)

Response: In addition to limiting development based on segment classification, the Secretarial Guidelines contain additional criteria for facilities located in the corridor. Facilities are divided into two categories: major public use facilities and basic facilities. The Secretarial Guidelines state that "major public use facilities such as developed campgrounds, major visitor centers and administrative headquarters will, where feasible, be located outside the river area. If such facilities are necessary to provide for public use and/or to protect the river resource, and location outside the river area is infeasible, such facilities may be located within the river area provided they do not have an adverse effect on the values for which the river area was designated." Thus, the Secretarial Guidelines first emphasize that facilities should be relocated outside the river corridor if feasible. Chapter 7, Table 7-1 provides an evaluation of each facility within the river corridor using these criteria. This analysis identified certain facilities, such as bike and raft rentals, that can feasibly be relocated outside of the river corridor.

Concern 56: An independent review should be conducted of the ORVs, indicators, standards, monitoring methods, and definitions of adverse effects.

> *Suggest an independent review be conducted of the ORVs, indicators, standards, monitoring methods, and definitions of adverse effects and degradation as proposed in the draft to ensure the plan will provide long-term protection and enhancement of the Merced River and its suite of values. This review panel should not include NPS employees or their contractors, and should include no one who was involved in the development of these elements of the plan.*
>
> (Individual; Correspondence #2273)

Response: ORVs were developed collaboratively with consulting agencies and the public, according to the Secretarial Guidelines. All supporting studies performed in preparation of the Draft Baseline Conditions Report were submitted for the appropriate level of peer review as specified in the 2008 NPS Interim Peer Review Policy available on line at http://www.nature.nps.gov/publications/NRPM/assets/docs/NPS_draft_peer_review.pdf.

Indicators, standards, definitions of adverse effects and degradation: Following the 2008 NPS Interim Peer Review Policy, NPS conducted a review of each of these components for each individual indicator proposed in the Draft MRP. Following guidance from NPS policy, appropriate reviewers were selected by the peer review manager. The selection of peer reviewers was conducted in adherence to the NPS Interim Peer Review Policy and coordinated through the Park Superintendent and the Chief of Resources Management and Science. Changes required by peer review have been made in the FEIS.

Monitoring Methods: When possible, MRP indicators follow established peer-reviewed protocols for data collection as noted in the text for each specific indicator. For newly developed indicators specifically designed to protect natural or cultural resources in Yosemite National Park from a unique suite of threats and stressors, managers are working closely with agency partners, university collaborators and subject matter experts to refine protocols. These methods will receive further review upon plan implementation through independent peer review or publication in a peer-reviewed journal.

Concern 57: The NPS should consider new or altered definitions of ORVs.

> *I feel that the Yosemite Valley should remain accessible and accommodating to the visitors who may not be the most rugged backpackers and rock climbers or the most experienced or equipped campers. The Valley provides a valuable exposure to the beauty and majesty of the Sierra Nevada to beginners, to families with children, to elderly, disabled, and visitors from around the world. ...Recreation opportunities should be preserved as part of the ORVs.*
>
> (Individual; Correspondence #1982)
>
> *I recommend that ALL biological entities in the Valley be included in the ORVs, and protected accordingly. The draft contains too few biological ORVs. This contrasts starkly with cultural ORVs, which include all American Indian ethnographic, archeological, and historic resources in Yosemite Valley. I support this holistic approach, so why wasn't the same approach applied to biological resources? All of Yosemite Valley is inextricably linked to the river, and you will find no more Outstandingly Remarkable Value anywhere else in the world.*
>
> (Individual; Correspondence #2273)
>
> *These programs offered by NatureBridge, which are dependant on low-cost lodging in the Valley are certainly in-line with Congress's intent under the Wild and Scenic River Act to be an ORV as they rely on the proximity of the lodging to the resources of the East Valley and the Merced River to provide a unique, rare, and exemplary experience for thousands of schoolchildren from diverse socioeconomic backgrounds.*
>
> (Individual; Correspondence #2918)

Response: The National Park Service carefully applied the Interagency Wild and Scenic Rivers Coordinating Council's guidance in determining the Merced's ORVs. That criteria is provided in "River Values and their Management" (Chapter 5) (a value must be river-related or river-dependent, and rare, unique, or exemplary). The agency found that river-related recreation in the valley and the meadows and riparian areas of the valley did indeed meet the criteria for inclusion as ORVs. However, the other resources mentioned are not river-related or dependent. Consequently, these do not meet the criteria for inclusion as ORVs.

Concern 58: The NPS should use the Segment 2 Recreational ORV description developed in May 2011 through public comment in order to secure constraints on the human-built environment.

> *Another example of "redefining " or selective editing is the DEIS rendition of the Segment 2 Recreation ORV which appears to now be termed a "rationale" (page 5-126). Amid much ado about the value of public input shaping the definitions of the ORVs back in May 2011, the Segment 2 Recreation ORV had been revised to include the following statements concerning the human-built environment and the visitor experience. "Exemplary experiences are protected and enhanced when proximity to the river allows close contact with its resources; visitors can choose time frames and seasons that suit activities, ranging from short day trips to multi-day opportunities. Appropriate infrastructure and services facilitate river-related activities but do not dominate the landscape or interfere with the natural setting that visitors have come to enjoy. Visitor use levels are appropriate so as not to contribute to crowding or congestion." In the Draft EIS, these statements now appear to have been edited out. Without constraints on the human-built environment so that it does not "dominate the landscape or interfere with the natural setting that visitors have come to enjoy," it would appear that the door is now open for expanded development in Curry Village at Boystown (e.g., multiple 2-story motel-style structures) and elsewhere as proposed in the preferred alternative.*
>
> (Individual; Correspondence #1617)

Response: ORV 20, the Recreational ORV, was revised to emphasize those activities that were truly dependent upon the Merced River and its iconic setting. Proximity to the river and the ability to choose one's form of recreation are inherent in this ORV. Alternatives 2–6 consider a variety of use and development levels, all intended to advance the alternative's theme while protecting and enhancing the river values, including the Recreational ORV.

Concern 59: The NPS should complete a thorough assessment of visitor use, visitor experience, and of the condition of outstandingly remarkable recreation values in Segment 2.

> *it was hoped that this [recreation] Chapter [of the Draft ORV Baseline Conditions Assessment Report] would also shine a light on the substantial increase in impacts when an activity such as rafting, bicycling, or mule/horseback rides is commercialized (i.e., managed for profit); the extra infrastructure required to support the activity (i.e., rental facilities, stables, bridle paths, paved trails, employee housing); as well as how increased participation rates increase opportunities for conflicts between users (e.g., bikers vs. hikers/walkers; stock use on trails vs. hikers; rafters vs. picnickers/Sentinel Beach; etc.). Increased participation also increases wear and tear on the natural resources perhaps conflicting with other ORVs (e.g., raft put-in/pick-up, trail maintenance, needs of stock, etc.). But the Report fell short failing to establish a clear 1987 baseline (instead relying on 1980 in some cases) and relying on previous self-administered generic surveys assessing visitor participation in activities and at facilities Park-wide (including shopping and dining) rather than focusing on activities specific to the Merced River Corridor. The primary research was directed toward attraction site use levels (e.g., Yosemite Falls, Bridalveil Fall, etc.) leaving critical data gaps with respect to other activities that are outstandingly remarkable in their own right. ... So it seemed there was not a lot to work with here with respect to focused research enabling a thorough assessment of the condition of the Segment 2 outstandingly remarkable recreation values, other than what had been done at attraction sites? And though the Recreation ORV definition highlighted appropriate recreation activities in the River corridor, there appeared to have been no attempt to gather direct input from those participating in the identified activities as to how they perceive*

> *the quality of their experience and suggested management considerations for the protection and enhancement of those experiences.*
>
> (Individual; Correspondence #1617)

Response: Visitor use and visitor activities in Segment 2 (Yosemite Valley) are widely varied. The NPS relies on a variety of studies, surveys, and methodologies to create a collection of data sources to generate condition assessments for the Recreational ORV. The Draft Baseline Conditions Report is one place where the Recreational ORV is characterized; however, there are other places in the document that communicate how the Recreational ORV is affected by various actions (See "River Values and their Management" [Chapter 5]) and the comprehensive River Value Analysis in "Alternatives" [Chapter 8]). Additionally, the visitor experience is analyzed in the EIS ("Affected Environment and Environmental Consequences" [Chapter 9]) as a discrete topic area and addresses how the visitor experience may be impacted by the implementation of each alternative.

Concern 60: The NPS should retain facilities and services in the corridor based on whether that facility or service is 1) river related or river-dependent; 2) rare, unique, or exemplary in a regional or national context; and 3) protects and enhances river values.

> *... example of selective omission might be the infamous Footnote 5 that is part of the 9th Circuit Court Ruling. Though planners focus on the first half of the Footnote, addressing at face value the list of facilities and services that are briefly outlined (e.g., rental facilities for bicycles and rafts, ice-skating rink, snack stands, gift shops, etc.), it appears the latter half of the Footnote is disregarded. "Although recreation is an ORV that must be protected and enhanced, see 16 U.S.C. § 1271, to be included as an ORV, according to NPS itself, "a value must be (1) river-related or river dependent, and (2) rare, unique, or exemplary in a regional or national context. The multitude of facilities and services provided at the Merced certainly do not meet the mandatory criteria for inclusion as an ORV. NPS does not explain how maintaining such a status quo in the interim would protect or enhance the river's unique values as required under the WSRA."*
>
> (Individual; Correspondence #1617)
>
> *... it is unclear why the Park does not explain to the public that the '82 WSRA Guidelines as well as the legal interpretation of the Court clearly state that programs/services in the Merced River corridor must be river-related and/or river dependent, and must be rare, unique, and exemplary in a regional or national context.*
>
> (Individual; Correspondence #1618)

Response: The Recreational ORV for Yosemite Valley does not include facilities and services. As explained in "River Values and their Management" (Chapter 5) of the Plan, the Recreational ORV for the Valley encompasses river-related recreational pursuits that allow visitors to directly connect with the river and its environs amidst the spectacular scenery of Yosemite Valley. Recreational activities that are part of the Recreational ORV include active pursuits such as hiking, biking, swimming, floating and water play, climbing, camping, or fishing; creative pursuits such as writing, painting, photography, and other arts; and educational and interpretive pursuits such as attending ranger-led walks and programs. These experiences allow visitors to immerse themselves in their surroundings, taking in the sights, sounds, and feel of the river and its dramatic backdrop. Facilities and services (e.g., Yosemite Lodge, food service facilities, shuttle bus stops) are not part of the ORV, nor do they need to be in order to be retained in the corridor. The Act allows facilities and services to be located within designated river corridors provided that they do not degrade ORVs and are necessary to support public use or resource protection. The response to Concern 345 explains the detailed process that NPS used to determine the facilities and services that could be retained in the river corridor.

Concern 61: The NPS should define camping in Yosemite Valley as an ORV and take appropriate actions to protect and enhance this value.

> *During one of the webinars (2/14?), it was stated that camping was an ORV. With respect to ORVs, the 1982 Guidelines state that "each component will be managed to protect and enhance the values for which the river was designated, while providing for public recreation and resource uses which do not adversely impact or degrade those values" (aka the nondegradation standard). WSRA then provides examples of possible River values such as scenery, recreation, fish and wildlife, geology, history, culture, and other similar values'though the primary emphasis still rests with the esthetic, scenic, historic, archaeologic, and scientific features. That being the case, there would seem to be no doubt that available camping opportunities in Yosemite Valley are in desperate need of protection and enhancement, especially considering the 54% loss of "family friendly" auto campsites.*
>
> (Individual; Correspondence #1617)

Response: Camping is widely available throughout the Sierra Nevada and the American West, so by itself does not meet the criteria for being "rare, unique, or exemplary." Consequently, it is not an independent outstandingly remarkable value, but is instead included as one of the many activities included in the recreational ORV in Yosemite Valley. For many people, camping is a fundamental part of their overall Yosemite Valley experience. That experience is certainly exemplary and for many is river-related or dependent. For these reasons, camping is one of the many activities specifically included within ORV 20, River-related Recreation in Yosemite Valley, though it is not called out an independent ORV.

Concern 62: The NPS should reconsider the designation of Sierra sweet bay as a species with Outstandingly Remarkable Value or provide additional information in the MRP/EIS to support the designation.

> *Having conducted some research on the Internet concerning the range of the Sierra Sweet Bay, I am not confident that this plant, found in the Wawona campground, meets the WSRA test required of an Outstandingly Remarkable Value by being, "rare, unique or exemplary on a regional or national scale." I am concerned that the designation of the Sierra sweet bay as an Outstandingly Remarkable Value is a construct used to justify the removal of campsites in the Wawona Campground. If the Sierra sweet bay found at the Wawona Campground is indeed, "rare, unique or exemplary on a regional or national scale, "the final MRPCMP/EIS should be revised to support that conclusion.*
>
> (Individual; Correspondence #2133)

Response: The Sierra sweet bay is found in only ten places in the world, two of which are in Yosemite. All populations are in the central Sierra Nevada. The shrub is listed on the California Native Plant Society list of Rare and Endangered Plants because of the restricted range which this species occurs. The NPS concurs that this plant is rare on a regional level. This plant also meets the IWSRCC criteria of being river-related or river-dependent. The population is in good condition, and management actions to protect and enhance the population, such as moving development farther away from the population, are not necessary at this time. The NPS will monitor the population per the methods described in “River Values and their Management” (Chapter 5). Should action be necessary to protect or enhance the population in the future (decline in abundance of more than 20%), the NPS would fence and/or augment the population with seeds or cuttings as described in Chapter 5.

Concern 63: The NPS should correct the inconsistency in how impacts to ORVs are presented in “River Values and their Management” (Chapter 5), specifically in the conclusion.

> *... it is evident that existing use of the Merced River watershed is not adequate to protect ORVs. As the DCMP/EIS acknowledges, existing and historical use of the River has resulted in numerous adverse impacts. While sometimes acknowledging these impacts, NPS concludes nonetheless that each ORV has*

been sufficiently protected from adverse effects, degradation, and management concerns. But NPS has not supported these conclusions with adequate analysis. For example, NPS' discussion of the free-flowing condition of the River admits adverse impacts such as channelization, continued bank erosion, constriction of River flows due to bridges and elevated trails, creation of artificial rapids, and widening. DCMP/EIS 5.19. Yet, without significant analysis, NPS claims that "[t]he free-flowing condition of the Merced River is determined to be absent of adverse effects, degradation, and management concerns." DCMP/EIS 5.23. This style of empty analysis bereft of facts continues throughout the rest of the DCMP/EIS's ORV baseline discussion.

(Civic Group; Correspondence #2945)

Response: The NPS has addressed the inconsistencies identified. Please see "River Values and their Management" (Chapter 5), for the revised analysis.

Concern 64: The NPS should provide justification for the removal of Recreational ORVs from Segments 3,4,5,7 and 8 in the current version of the Merced River Plan.

The ORVs have substantially changed since the 2010 draft ORV report. The MRP does not explain the reasons for these changes.

(Business; Correspondence #2818)

The Recreational ORV in the MRP is only identified in Segment 1 and Segment 2. The 2011 ORV Comparison Table shows that every other planning effort to identify ORVs of the Merced River noted recreational values in ALL segments of the river (except Segment 6 - Wawona Impoundment, where there are no ORV5). The descriptions of the Recreational ORV in Segment 3, 4, 5, 7, and 8 in the 2010 Draft ORV Report were accurate and showed that these segments had recreational value that was unique, rare, exceptional, river related and river dependent - all requirements to be an CRy. Why were recreational values removed from these segments in the current MRP? Why are the recreational opportunities the entire river has to offer not being protected and enhanced? The NPS should provide substantial justification (in the form of a post-2010 scientific recreational study) for the removal of the Recreational ORV from Segments 3, 4, 5, 7, and 8 ...

(Business; Correspondence #2819)

Response: The Recreational ORVs were removed from Segments 3, 4, 5, 7, and 8 because the river-related activities in these segments are not rare, unique, or exemplary. For a complete history of the ORVs and how they have developed over time, please see Appendix M of this document.

Concern 65: The Yosemite Valley Historic Resources ORV (ORV 10) should be broadened to include nationally-significant historic resources and should appropriately address protection and enhancement of the ORV.

Unfortunately, we believe the new ORV [10] as currently proposed, fails to adequately incorporate and protect historic buildings, structures, and landscapes in Yosemite Valley. This failure stems both from the excessively narrow scope of the ORV, which fails to protect historic resources outside of the ORV, as well as from the Management Program, which fails to protect historic resources inside the ORV. ... In developing ORV 10, the NPS describes a "linked landscape of river-related or river-dependent, rare, unique or exemplary buildings and structures that bear witness to the historical significance of the river system." But despite this appropriate framing of the ORV, it appears to actually consist not of that linked landscape, but rather of seventeen individual structures that are said to "represent" the "collective" Yosemite Valley Historic Resources ORV. This means that fewer than 2% of the 929 contributing resources in the Yosemite Valley Historic District have been deemed eligible for inclusion in the ORV. There is no reasonable basis for excluding such a huge number of historic structures.

(Civic Group; Correspondence #8328)

... the MRP's Yosemite Valley Historic Resources Outstandingly Remarkable Value (ORV) 10 is undersized and should be broadened to be more inclusive, and therefore more protective, of nationally significant

river-related historic resources in Yosemite Valley. ... The National Trust believes that NPS must reassess the proposed alternatives and develop a new, improved alternative approach that expands the Historic Resources Outstandingly Remarkable Value (ORV 10), adopts several elements from Alternative 6 that protect historic resources (notably preserving intact all historic bridges, preserving entire Merced High Sierra Camp and retaining and rehabilitating Residence 1 on its current location), in order to ensure that the MRP protects and enhances historic, archeological, cultural, and natural values as required under federal law. ... The Management Standard, Adverse Effect Standard, and Degradation Standard for ORV 10 fail to adequately protect even those historic resources included in the ORV

(Civic Group; Correspondence #8328)

... why in this case, the ORV [9] and the National Register-listed district are coterminous, in glaring contrast to the boundaries of the Yosemite Valley Historic Resources ORV (17 historic properties) and the National Register-listed Yosemite Valley Historic District (929 contributing historic properties). While the entire Yosemite Valley Historic District is both river-related and nationally significant, it is not afforded the same ORV recognition as this [ORV 9] district

(Civic Group; Correspondence #8329)

A review of the other ORV's shows that none are described as merely "representing" a river value. For example, ORVs 1 and 2 do not purport to include one or two meadows as representing all meadows, but rather include the entire "meadow-riparian complex". MRP at 5-3. While the NPS may choose a particular element of an ORV as an indicator for an ORV, that indicator shouldn't be a substitute for a cohesive ORV. For example, we note that riparian bird abundance is used as an indicator for riparian habitat, but at no point does the MRP suggest that riparian birds are the ORV. The ORV 10 should logically consist of the resources of the Yosemite Valley Historic District, not a representative collection. If the same approach were used for biological resources, the NPS would be developing a plan not to manage ecosystems, but rather to protect individual species. Of course, that sort of resource stewardship fell out of favor long ago, and yet for its historic resource ORV, the NPS is picking a few buildings and structures to protect that merely "represent" the nationally significant historic district that they are part of.

(Civic Group; Correspondence #8329)

The NPS should modify ORV 10 to be coterminous with the Yosemite Valley Historic District and also include any additional resources in its boundaries that are determined eligible for the National Register. The draft Management Standard sets a reasonable mark for improvement of a structure's condition, but leaves a huge loophole which allows for building demolition. It should be reconstituted to proactively encourage the retention of historic properties in the ORV and also to protect and enhance historic landscapes.

(Civic Group; Correspondence #8329)

[Yosemite Valley Historic District National Register Nomination] This National Register nomination – a nomination that was prepared by NPS it

(Civic Group; Correspondence #8329)

Response: Please see response to Concern 38.

Concern 66: The NPS should not justify the removal of Residence 1 as an action to protect and enhance the Biological ORV.

... the MRP fails to "preserve and enhance" historic resources as required under the WSRA. The MRP defines "enhancements" as "actions taken to improve the condition of a river value." This definition does not take into account whether an "enhancement" also negatively impacts other river values. The National Trust believes that in order to legitimately qualify as an "enhancement," a proposed action should both improve the condition of a river value and avoid or minimize harm to other river values. This review of the impacts of the preferred alternative makes it clear that "enhancements" proposed in the Plan will result in significant harm to historic resources that contribute to the Merced's ORVs and that these historic resources will suffer excessive harm when compared to other resource types. There is

no adequate foundation in law or policy to support proceeding with an alternative whose impacts will so disproportionately harm historic resources.

(Civic Group; Correspondence #8328)

This is the approach that is described at some places in Alternative 6, such as at 8-292. While the MRP contends that the Biological ORV would be enhanced by the demolition of Residence 1, because it "may reduce informal trailing in the adjacent meadow" and it "may enhance the Cultural ORV by allowing for recruitment of black oaks," these possible "enhancements" to other ORVs (which have numerous opportunities for enhancement in other ways) should not be justified at the expense of Residence 1, and are in any case threats that the Park knows how to address. MRP at 8-341,345.

(Civic Group; Correspondence #8329)

Response: Demolition of the Superintendent's House and Garage (Residence 1) in Alternative 5 (Preferred) was determined to be the preferred action after fully considering other treatments such as elevation of the buildings in place, relocation of the Superintendent's House, and stabilization of the building. The options to elevate or stabilize the buildings to prevent excessive flood damage were dismissed because they do not guarantee protection of the buildings from flood damage. The option to relocate the Superintendent's House was dismissed because of cost considerations and because it would result in adverse effects to the Yosemite Village Historic District. Demolition of these buildings will have the additional benefit of enhancing meadow and floodplain areas, due to floodplain restoration and the removal of informal trails.

Concern 67: The NPS should provide clear rationale that explains why the user capacities for the East Valley (2A) and West Valley (2B) segments are not considered separately.

The plan itself evaluates impacts to free flow and ORVs on a "segment wide basis." The impacts of the alternatives cannot be accurately evaluated for the Scenic West Yosemite Valley segment if that segment has no separately identified user capacities. Failure to identify distinct user capacity levels suggests that NPS believes that the West Valley can sustain the same level of use as the East Valley. It is arbitrary to analyze impacts to these two river segments as one, when they have different classifications and therefore different qualities/baseline ORVs to protect and enhance.

(Civic Group; Correspondence #8330)

Response: Please see response to Concern 47.

NEPA

Concern 68: The NPS should clarify the baseline levels from which impacts to resources are evaluated.

The Tuolumne County Chamber of Commerce ... appreciate the expansion of campsites and lodging as well as day-use parking, but are confused with the precentage increases since we ar enot sure what the baseline is. Is the baselin at today's levels or pre-flood levels?

(Business; Correspondence #2197)

There seems to be a lot of reference to removing and restoring to a previous natural state. Just how far back in time do you propose the restoration point? If that point is a few million or so years, how do you propose to undo the evolutionary processes that have taken place since then?

(Individual; Correspondence #2606)

Response: Alternative 1 (No Action) describes the current condition (or baseline condition) from which Alternatives 2–6 are compared to. Capacity increases or decreases proposed in Alternatives 2–6 are in comparison with what exists on the ground today for camping, lodging and parking. Some "pre-flood

condition" levels of camping, lodging and parking are explored as components across the range of alternatives. For example, Alternative 6 proposes restoring the number of units at the Yosemite Lodge to 440 units (the number of units that existed prior to the 1997 flood).

Concern 69: The NPS should organize the cumulative impacts analysis by listing related projects, then providing a discussion of how impacts from these projects—combined with impacts from the proposed project—will cumulatively impact the environment.

> *The current alternatives are unaceptable because they do not consider cumulative impact on park visitation patterns and the impact of this on the natural and cultural environment.*
>
> (Individual; Correspondence #1091)
>
> *The DCMP/EIS ... does not present a clear and concise cumulative impacts analysis that informs the public and decisionmakers about the cumulative impacts of each potential action, as taken with past, present and future projects. Instead, it chops its discussion into disjointed sections, randomly sprinkled throughout Volumes 2A and 2B. DCMP/EIS Appendix B catalogs a jumble of past, ongoing and future actions within Yosemite, the adjacent forest lands and Mariposa County but does not (1) describe private projects undertaken in the River corridor and (2) analyze whether these actions "have any additive impact on a particular resource." DCMP/EIS App. B.1.17 The DCMP/EIS's main discussion of action alternatives is also silent as to the cumulative impacts of these alternatives. See DCMP/EIS Chapter 8, generally. Instead, NPS examined cumulative impacts on biological resources only within DCMP/EIS Appendix N. Appendix N is the Draft Biological Assessment (DCMP/EIS App. N.62) which looks at the potential impacts of the action alternatives on specific listed species, when taken with past, present, and future actions. DCMP/EIS App. N.62-N.104. This analysis does not, however, examine cumulative impacts to ORVs. The majority of the DCMP/EIS's discussion of these impacts is scattered about the eight sub-sections of Volume 2a, Chapter 9, Affected Environment and Environmental Consequences. The DCMP/EIS's haphazard organization undermines public understanding of these impacts. The discussion of cumulative impacts within Chapter 9 stymies rather than advances public and agency decisionmaking. A true cumulative impacts analysis lists related projects and then provides a discussion of how impacts from these projects, combined with impacts from the proposed project, will cumulatively impact the environment. Here, however, NPS discusses only a modest sampling of projects that have occurred, or will occur, as it analyzes the NPA's impacts to eight subsections of DCMP/EIS Chapter 9. It then makes general statements regarding the impacts of the action alternatives, without providing substantive analysis. This must remedied.*
>
> (Civic Group; Correspondence #2945)

Response: In accordance with the National Park Service's Director's Order 12: Conservation Planning, Environmental Impact Analysis and Decision Making, Section 2.4 (1508.7, 1508.25 (a)(2)) "Cumulative actions are those that have an additive impacts on a particular environmental resource. It is irrelevant who takes these actions (i.e., they are not confined to NPS or even federal activities), or whether they took place in the past, are taking place in the present, or will take place in the future." “Affected Environment and Environmental Consequences” (Chapter 9) evaluates cumulative impacts by impact topic type. Each impact topic has been evaluated in accordance with Director’s Order12.

Concern 70: The NPS should propose additional protection and restoration for biological resources along the Merced River and Yosemite Valley, as the existing plan lacks adequate protection for rare and unique biological resources.

> *I have great concerns about the adequacy of this DEIS. It lacks adequate protections for the rare and unique biological resources found along the Merced River and the surrounding Yosemite Valley. It also disregards opportunities to restore some of the damaged ecosystems including riparian and meadow. The purpose of a DEIS is to fully disclose biological project/plan impacts and then to mitigate for such impacts by protecting another equivalent site/area or if that is not possible to provide an alternative project/plan onsite that is environmentally superior to the proposed project/plan that removes the*

unmitigable impacts. Since the Merced River and its surrounding Yosemite Valley are a one of kind biological and geological ecosystem there is no offsite/other area to restore that is equivalent.

(Individual; Correspondence #1758)

Response: Please see Appendix E: Ecological Restoration for a comprehensive and detailed description of restoration actions, including actions to restore meadow and riparian habitats. "Alternatives" (Chapter 8) enumerates actions that are required to protect and enhance river values and other unique biological resources found along the Merced River.

Concern 71: The NPS should revise the DEIS to reduce the length of the document and improve its readability.

The DEIS is massive making it virtually impossible for the public to digest. How does such a massive document meet the CEQ regulations and other NEPA requirements for length and readability? There appears to be problems with including the appropriate information in the appropriate chapter.

(Individual; Correspondence #2730)

It is difficult for the public to understand what services will be offered in Yosemite's future by reviewing only one of these plans and complete understanding of all these plans in full is beyond the capacity of most members of the public. ... With the release of so many land management plans, the NPS, in essence, is completing a new, piecemeal General Management Plan for the park. Because of this reality, the NPS should consider a comprehensive report to the public of the most significant impacts to their day-to-day experience, Including the elimination, reduction, increase and/or relocation of visitor services and limits on or expansion of recreational opportunities throughout the park would be especially helpful. This document could more fully describe the cumulative impact of management actions on Visitor Experience and Recreation and the cost, funding and time line for implementation than any of the individual plans do.

(Business; Correspondence #2819)

Response: Please see the response to Concern 2.

Concern 72: The NPS should revise and expand the cumulative ADA accessibility analysis in the EIS.

Another example of inadequate cumulative analysis is the removal of many ADA accommodation services throughout the park in the various plans, as well as many traditional and historic visitor services

(Business; Correspondence #2819)

Response: The Merced River Plan/FEIS has been revised to retain many services and facilities originally proposed for removal under the DEIS. Accessibility issues are governed by federal law, but are not generally an issue separately analyzed in the cumulative impacts section of an EIS.

Concern 73: The NPS should graphically display impacts of all proposed construction on maps and comprehensively analyze these impacts, as the current impact tables and maps do not clearly communicate the full impact of proposed construction in the river corridor.

As many areas of new construction are not shown on the maps, it is not clear whether these impacts were included in the acres of vegetation impacted. Please clarify and re-calculate if necessary.

(Unaffiliated Individual; Correspondence #3434)

Response: The EIS evaluates the potential impacts of all of the proposed actions under each alternative with the best available information the NPS has at this time. In some cases, additional project information for a

specific action may be developed as the plan is implemented, and in some cases additional NEPA compliance may be necessary to address those changes.

Concern 74: The NPS should make its analysis between Chapter 5 (River Values) and Chapter 9 (Affected Environment and Environmental Consequences) consistent.

> *There appears to be problems with including the appropriate information in the appropriate chapter. Chapter 5 includes much information about the affected environment lacking in Chapter 9, even though Chapter 9 (in volume 2) is both the affected environment and environmental consequences section. For example, Chapter 9 includes no specific information on the condition of the meadows in the wilderness portion of the upper Merced River. Chapter 5 includes some of that information, though it is not adequate*
>
> (Individual; Correspondence #2730)

Response: The NPS has updated "Affected Environment and Environmental Consequences" (Chapter 9) with the relevant information. Note, however, that NPS Director's Order 12 states: "An EIS is to be analytic rather than encyclopedic." The NPS has appended, summarized, or incorporated by reference background material, highly technical material, and less important descriptive information to reduce the size of an already very large document.

Concern 75: The NPS should not set the baseline for visitor use based on existing conditions, but should instead employ lower use levels, such as those established for the original Merced River Plan.

> *All of the Park's analyses are inaccurate because they chose to set new baseline conditions based on visitor use and facilities in 2011 instead of using the already established baseline conditions from the original MRP. The differences between use levels is substantial enough that the entire plan should be thrown out. The court's ruling on the 2005 MRP stated that the user capacity should not be set based on current use levels but levels of use that are protective of the river values. Yet, in this third edition of the plan, the Park still sets a user capacity that reflects current use levels. The Park clearly favors the visitor experience ORVs and is caving to the political pressures instead of standing up for what is good and right for protecting the river. Any biologist without fear of losing their job or facing the immense visible political pressure being placed on the Park would not find current use levels to be protecting and enhancing the river.*
>
> (Unaffiliated Individual; Correspondence #3412)

Response: The visitor use levels established in Alternatives 2-6 are not based on existing conditions. As explained in response to Concern ID 216, the NPS followed a rigorous and thoughtful process to develop the plan's user capacity program. All of the action alternatives propose a number of changes to the kinds, amounts and timing of use that would be allowed in the future. Use levels under many of the action alternatives would be lower than existing levels in Segments 1, 2, 6 and 7 of the river corridor. In addition, all of the action alternatives propose a number of changes to the type and level of facilities in the river corridor and would remove or relocate facilities that are causing localized impacts to river values.

Also see response to Concern ID 83 which explains the difference between WSRA's requirement to protect and enhance ORVs compared to NEPA's requirement for the No Action alternative.

Concern 76: The NPS should clarify inconsistencies in the impacts analysis relating to retaining the Merced Lake High Sierra Camp.

> *In terms of biological impacts, the DEIS seems to claim (erroneously) there is little or no difference between the preferred alternative and the options that eliminate the Merced River camp when comparing the summary of impacts. However, Chapter 9 does show, albeit inconsistently, major difference between options regarding wilderness character, which include biological factors. This creates confusion for a decision-maker.*
>
> (Unaffiliated Individual; Correspondence #2730)

> *In terms of wilderness character, ... the DEIS has problems of inconsistent analysis. For example, the DEIS clearly shows major impacts to wilderness character from the Merced camp. They are termed "major." At the same time, the DEIS claims that the preferred alternative (alternative 5) would have impacts that are "long term, negligible to minor, and beneficial." Why is there this inconsistency? ... The DEIS documents increasing recreation use for the years under study (see table 9-146). However, the analysis of impacts does not take these increases into account in terms of wilderness character. Why not?*
>
> (Unaffiliated Individual; Correspondence #3412)

Response: The impacts analysis has been updated to include clarifying language on the impacts to wilderness character as a result of actions associated with the removal or retention of the Merced Lake High Sierra Camp. In Volume 1 of the FEIS any impacts associated with the presence of the high camp are categorized as "management concerns" that are considered enhancement actions, and not actions that are associated with major adverse effects.

Concern 77: The NPS should quantify day use impacts in the wilderness segments of the Merced and South Fork Merced Rivers.

> *The DEIS also fails to quantify day use impacts in the wilderness segments of the Merced and South Fork Merced Rivers. It doesn't consider whether adjustments in numbers would obviate the need for trail reconstruction or relocation. In fact, there is almost no discussion of the impacts of trails on wilderness character. There is no finding that relocated or reconstructed trails are indeed the minimum necessary and if so, what standards of work are the minimum necessary. There is no explanation of outfitting allocation, with stock or without, versus self-guided parties and how impacts may vary between the different groups. Lastly, there is no clear analysis of impacts from diverting wilderness use from one place to another (see ES-21).*
>
> (Unaffiliated Individual; Correspondence #2730)

Response: All wilderness segments do quantify estimates of day-use within the capacity calculations that are used to assess impacts. Please see summary tables in Chapter 6 for the calculations used to achieve these quantifications.

Concern 78: The NPS should compare the conditions of the river now with those extant in 1987, in order to identify and address degradation of the river's ORVs.

> *. . .Yet the DCMP/EIS does not adequately incorporate these historical 1987 baseline conditions when analyzing the benefits and risks of the alternatives and the No Action Alternative ("NAA"). Instead, Chapter 8 establishes that the NAA "represents existing conditions in 2011" and "serves as a baseline from which to compare the action alternatives." DCMP/EIS 8-13.2 This ignores NPS' duty to compare the conditions of the river now with those extant in 1987, in order to identify and address degradation of the river's ORVs. This omission violates NPS' duty under the WSRA to protect and enhance the river's ORVs.*
>
> (Civic Group; Correspondence #2945)

Response: Chapter 5 of the plan includes a discussion of the condition of each ORV at the time of designation and compares that condition to the ORV's current condition. The NPS used this information, together with the indicators and standards included in Chapter 5, to identify whether adverse impacts or degradation were present. As discussed in response to Concern ID 118, no instances of degradation have been detected.

Concern 79: The NPS should include elements from the 1980 GMP, the Wilderness Plan, and other key management plans such as the Superintendent's Compendium in the "No-Action Alternative."

> *The NAA should include "a full description of what the status quo is and how it was reached . . . ." Center for Biological Diversity v. BLM, 746 F.Supp.2d 1055, 1091 (2009) (vacated in part, 2011 WL 337364*

(N.D.Cal.2011)). It must inform the public of the changes that have occurred to the River since its 1987 designation so that the public may "accurately assess the true nature of the status quo, as well as the proposed alternatives against which it is compared." Id. "The 'no-action' alternative should have included the elements from the 1980 GMP, the Wilderness Plan and other [key management plans] such as the Superintendent's Compendium." Friends of Yosemite Valley v. Kempthorne, 520 F.3d 1024, 1038 (9th Cir. 2008) (describing the elements that NPS should have included in the Merced River CMP). Yet the DCMP/EIS fails to follow these guidelines. For example, it fails to integrate its discussion of River-related recreational uses from 1987 onward with its discussions of user capacities or the NAA.

(Civic Groups; Correspondence #2945)

Response: As described in the Overview section of the No Action Alternative in Chapter 8, the No Action alternative is based on management direction provided in the 1980 GMP and the 1989 Wilderness Management Plan. The Superintendent's Compendium is not a planning document. Rather, it is a compilation of the designations, closures, permit requirements and other restrictions that relate to visitor use in particular areas of the park. Relevant restrictions from the Compendium, such as the Half Dome permit system, have been included in the No Action alternative.

Concern 80: The NPS should include private projects undertaken within the river corridor in the cumulative impacts analysis, and analyze whether these actions have any additive impact on a particular resource.

Appendix B catalogs a jumble of past, ongoing and future actions within Yosemite, the adjacent forest lands and Mariposa County but does not (1) describe private projects undertaken in the River corridor and (2) analyze whether these actions "have any additive impact on a particular resource."

(Civic Group; Correspondence #2945)

Response: The NPS has permitting authority over development projects on private land in Section 35. This authority does not derive from WSRA. Instead, it derives from NPS's legislative authority over lands within park boundaries. The only private lands within or near the Merced Wild and Scenic River corridor are found in Wawona, in an area known as Section 35, and in El Portal. NPS has revised the cumulative impact discussion to address past and reasonably foreseeable development projects on private land.

NEPA—Planning Process

Concern 81: The NPS should affirmatively commit to management actions to protect river values by using clear, plain language in the management action tables.

Suggest you delete the word "possible" in the tables of management actions that could be implemented if standards are reached or breached for each river value. As long as the word "possible" is included, you have made no solid commitment to take any action at all.

(Individual; Correspondence #2273)

This [5-39] table suggests that if two locations (note: not primary viewing areas) exceed capacity more than 10% of the time over a 3-year interval, then the park staff may increase monitoring and advise people of other recreation opportunities. (Note that "10% of the time over a 3-year interval" does not specify time of year for monitoring.) In this proposal, only when 5 "locations" are above the site standard will actual action be taken to reduce crowding. Even then, permitting use of an affected area is only a "possible management action."

(Individual; Correspondence #8330)

Response: The wording in the tables of management actions has been revised to state "Required Management Actions."

Concern 82: The NPS should clearly describe the phasing or schedule of implementation of the Plan.

I am very aware of the need to develop a legally sufficient MRPCMP/DEIS that will serve as the basis for the next primary concession contract. The final MRP should clearly state how phasing of actions called for in the plan will be scheduled and funded. The interim strategies that will be necessary to continue park operations and resource protection until actions called for in the MRP can be fully implemented should be clearly described to set reasonable expectations on the part of the public, gate community residents and businesses, park concessioners and park employees. There should be no illusion that actions will be imminent (unless they are) and that patience will be required by all parties.

(Individual; Correspondence #2133)

Suggest you provide a detailed timeline for the plan. What actions will occur first, and which ones will be highest priority? Suggest you complete ecological restoration and actions that clearly protect the river first, as opposed to construction of new campgrounds and road re-routes.

(Individual; Correspondence #2273)

A more comprehensive summary of the cumulative impact of the plans should be provided to allow the public to understand the comprehensive impact on Yosemite's visitors and to provide a realistic assessment of the time frame and cost of implementation

(Business; Correspondence #2818)

Response: Actions identified in the plan will be completed as prioritization warrants and funding becomes available, which cannot be projected at this time. However, restoration actions (outlined in Appendix E), actions to address vehicle/pedestrian conflicts, and other actions that reduce traffic congestion in Yosemite Valley are a high priority and will likely be implemented as soon as practicable.

Concern 83: The NPS should analyze an alternative using 1987 as the baseline for comparison in order to fully analyze impacts to resources since the time of designation.

The Wild and Scenic Rivers Act stipulates that a CMP "shall address . . . user capacities . . . to achieve the purposes of this chapter." 16 U.S.C. § 1274(d)(1). WSRA's regulations define user capacity as "the quantity of recreation use which an area can sustain without adverse impact on the Outstandingly Remarkable Values and freeflowing character of the River area, the quality of recreation experience, and public health and safety." 47 Fed. Reg. at 39455. NPS is thus required to place specific and measurable restrictions on the use of the River. Friends of Yosemite v. Norton, 348 F.3d 789, 796 (9th Cir. 2003). By failing to propose any user capacity thresholds in the past, NPS violated the plain language of the Act. All of the alternatives examined in the DCMP/EIS use currently existing conditions and user capacities as a baseline. .... In the Merced Gorge, there are no alternatives presented aside from currently existing management capacities. DCMP/EIS 6.34. But NPS has a duty to consider visitor levels in 1987, the baseline year. Its failure to do so undermines achievement of WSRA's objectives to restore and enhance the River's ORVs. ... NPS should not base the River's capacity solely on existing use levels. Just because the River has handled a certain number of visitors in the past does not mean that the River can continue to do so in the future without adversely affecting the River's ORVs. The NAA [No Action Alternative] does not, in fact, analyze existing and projected adverse impacts to ORVs from the perspective of the 1987 baseline. DCMP/EIS 8.13-8.52. Nor is there any discussion of whether existing user capacities are in fact adequate to protect ORVs. Without such analysis, it is not possible to determine whether reductions below current levels would protect ORVs better than the preferred alternative, which would increase user capacities. NPS should not merely assume that historical capacities are adequate to insure protection of ORVs.

(Civic Group; Correspondence #2945)

.. Yet the DCMP/EIS does not adequately incorporate these historical 1987 baseline conditions when analyzing the benefits and risks of the alternatives and the No Action Alternative ("NAA"). Instead, Chapter 8 establishes that the NAA "represents existing conditions in 2011" and "serves as a baseline from which to compare the action alternatives." DCMP/EIS 8-13.2 This ignores NPS' duty to compare

the conditions of the river now with those extant in 1987, in order to identify and address degradation of the river's ORVs. This omission violates NPS' duty under the WSRA to protect and enhance the river's ORVs.

(Civic Group; Correspondence #2945)

The NAA should include "a full description of what the status quo is and how it was reached . . . ." Center for Biological Diversity v. BLM, 746 F.Supp.2d 1055, 1091 (2009) (vacated in part, 2011 WL 337364 (N.D.Cal.2011)). It must inform the public of the changes that have occurred to the River since its 1987 designation so that the public may "accurately assess the true nature of the status quo, as well as the proposed alternatives against which it is compared." Id. "The 'no-action' alternative should have included the elements from the 1980 GMP, the Wilderness Plan and other [key management plans] such as the Superintendent's Compendium." Friends of Yosemite Valley v. Kempthorne, 520 F.3d 1024, 1038 (9th Cir. 2008) (describing the elements that NPS should have included in the Merced River CMP). Yet the DCMP/EIS fails to follow these guidelines. For example, it fails to integrate its discussion of River-related recreational uses from 1987 onward with its discussions of user capacities or the NAA. See, generally, DCMP/EIS Chapters 5, 6, and 8. While the DCMP/EIS identifies areas that fall below its "management standards" for various ORVs, it does not clearly tie these deficiencies to the NAA's baseline. Because the NAA fails to discuss how the degradation that has occurred subsequent to the River's designation has impacted ORVs, it obscures a true assessment of the River's historic and current conditions.

(Civic Group; Correspondence #2945)

All of the Park's analyses are inaccurate because they chose to set new baseline conditions based on visitor use and facilities in 2011 instead of using the already established baseline conditions from the original MRP. The differences between use levels is substantial enough that the entire plan should be thrown out. The court's ruling on the 2005 MRP stated that the user capacity should not be set based on current use levels but levels of use that are protective of the river values. Yet, in this third edition of the plan, the Park still sets a user capacity that reflects current use levels. The Park clearly favors the visitor experience ORVs and is caving to the political pressures instead of standing up for what is good and right for protecting the river. Any biologist without fear of losing their job or facing the immense visible political pressure being placed on the Park would not find current use levels to be protecting and enhancing the river.

(Individual; Correspondence #3412)

The DEIS does not properly disclose the extent of many construction-increased capacity projects, capacity-increasing management actions, as well as related environmental and social impacts which have affected the Merced since designation in 1987. The DEIS generally uses 2011 as the baseline within the No-Action discussion. But much of what happened between 1987 and 2011 is not evaluated. An added problem is the long use or abuse of the categorical exclusion--although this improved after the Settlement.

(Individual; Correspondence #3693)

Response: This comment confuses the NPS's mandate under WSRA with the requirements of NEPA. Our response to Concern Number 39 explains that the NPS followed guidance from the Interagency Wild and Scenic Rivers Coordinating Council in presenting detailed information about baseline ORV conditions. This information is found in "River Values and their Management" (Chapter 5) of the plan, which describes the condition of each ORV at or near the time of designation and compares that condition to current conditions and then explains whether the ORVs have been degraded or adversely impacted since the river was designated. No instances of degradation or adverse impact were found, however various management concerns were identified. Chapter 5 presents management actions to remedy these concerns. All of the management actions have been incorporated into Alternatives 2-6, as described in the section on Actions Common to All Alternatives.

The requirement to consider a No Action Alternative is a requirement of NEPA, not WSRA. According to the Department of Interior's regulations for implementing NEPA, the No Action Alternative either means "no project" or "no change" from "the current management direction or level of management intensity." 43 C.F.R. Section 46.30. The No Action alternative here falls into the latter category and is based on "current guiding management documents." It assumes that "current trends in the condition of natural and cultural resources and visitor experiences would continue, consistent with the management activities that are ongoing under currently approved plans."

The No Action alternative does not ignore past actions that have impacted the ORVs. For example, the No Action alternative explains that the river's free flowing condition would continue to be impacted by riprap and revetment that would remain in place; abandoned underground infrastructure in the river channel that would not be removed; and large woody debris which would be removed to facilitate rafting and protect infrastructure. These are all examples of past development that Chapter 5 identified as "management considerations." Because the No Action Alternative would not change these on-the-ground conditions, the environmental consequences analysis in "Affected Environment and Environmental Consequences" (Chapter 9) analyzes the impact of retaining this type of development into the future. By contrast, each of the management considerations related to free flowing condition is remedied in the action alternatives, and the resulting beneficial impacts are described in Chapter 9.

Concern 84: The NPS should have finalized the *Merced Wild and Scenic River Values Draft Baseline Conditions Report* as a foundational document prior to engaging in public outreach.

> *the final version of the ORV Baseline Conditions Assessment Report still had not been completed. This foundational document was integral to the alternative development planning process 'especially as it applied to the Recreation ORV.*
>
> (Individual; Correspondence #1617)

Response: The NPS began public outreach with the best available information based on decades of research related to river values. Public outreach has been a foundational element throughout this planning effort. The public was given an opportunity to weigh in on the Draft Baseline Conditions Report, and this input was used to revise the report. Several research studies that were completed in 2011also informed this revision. As public involvement efforts and the development of the Draft Baseline Conditions Report occurred simultaneously, it would not have been possible to finalize this report before engaging in public outreach for the plan. "River Values and their Management" (Chapter 5), River Values and their Management, provides a detailed assessment of the baseline conditions of river values.

Concern 85: The NPS should revise the EIS to include current demographic data on Yosemite visitors in the socioeconomic impacts analysis.

> *Especially disconcerting in the socioeconomic analysis is the absence of any data updating the status of the current Yosemite visitor. Past plans have documented annual household income, ethnicity, etc., with respect to Yosemite visitors, California residents, and Yosemite Region residents, even though most of the data was gathered in 1990-91*
>
> (Individual; Correspondence #1617)

Response: Per the requirements of NEPA, the socioeconomic impact analysis examines the effects of each alternative on the regional economy versus a particular demographic. Accordingly, the focus of the analysis is necessarily regional. The "Affected Environment and Environmental Consequences" (Chapter 9)

socioeconomic analysis captures the regional economic implications of changing visitation patterns for all demographics across alternatives.

Concern 86: The NPS should take a comprehensive approach to managing the Merced River, and cooperate with other federal agencies to develop a comprehensive management plan that addresses the entire watershed.

> *... the River is protected for an additional 41 river-miles as it flows through federal lands administered by the U.S. Forest Service ("USFS") and Bureau of Land Management ("BLM"). While 16 U.S.C. section 1274 (a)(62) mandates that NPS establish detailed boundaries and determine appropriate classifications for River segments within Yosemite's boundary, sections 1281 and 1283 also require NPS to "cooperate" with other federal agencies such as BLM and USFS that share responsibility for managing the River. ... BLM and USFS jointly administer the 1991 South Fork and Merced Wild and Scenic River Implementation Plan ... Going forward, NPS must coordinate with BLM and USFS to take a fully comprehensive approach to managing the River in order to best protect the River's ORVs for all 122.5 protected river-miles.*
>
> (Civic Group; Correspondence #2945)

Response: When Congress added the Merced River to the National Wild and Scenic Rivers System, it indicated that the planning requirements of the WSRA for the portions of the river managed by the NPS could be fulfilled through revisions to the park's General Management Plan. Therefore, the NPS has decided to prepare the MRP as an amendment to the GMP. The NPS is not required to prepare a joint river management plan with the BLM and USFS. However, the NPS, BLM, USFS and other federal agencies follow the guidance of the Interagency Wild and Scenic River Coordinating Council to ensure river management is consistent across agencies.

Concern 87: The NPS should revise the EIS to address socioeconomic impacts to local counties resulting from the loss of commercial recreation and lodging.

> *From September to June, a period of typically low park visitation, our NatureBridge students occupy lodging at concessioner-operated facilities, purchase breakfast and dinner at food service facilities, and pay for transit within the park. This equates to an annual contribution to the local Mariposa County economy of over $1.6 million in contracted services. A large portion of this amount (that related to lodging) contributes to Mariposa County's Transit Occupancy Tax. Should NatureBridge no longer be able to house students in concessioner-operated facilities at Boystown (or elsewhere in Yosemite Valley) due to implementation of any of the Merced River Plan action alternatives, a portion of the Transit Occupancy Tax that our programs provide to Mariposa County would likely be diminished or disappear. As we just discovered with the closure of student lodging due to hantavirus last fall, it is likely that the number of jobs would shrink commensurate with our ability to run programs. This analysis should be accounted for within Chapter 9, Socioeconomics.*
>
> (Individual; Correspondence #3376)
>
> *I am very concerned about what was not addressed of the impact of the River and my County and would be concerned another lawsuit would delay the Plan even longer.*
>
> *"Footnote 5" was put into the MRP with no study of the impact on the River if the commercial operations are removed. In addition the SocioEconomic Impact Study did not include the loss of sales tax to the County, which will be a big financial impact. It is the neglect of including these issue in the Plan that leads me to believe there will be grounds to challenge it.*
>
> (Individual; Correspondence #3522)

Response: Please see response to Concern ID 407.

Concern 88: The NPS should consider and give greater emphasis to the recreational use patterns of economically disadvantaged and multicultural visitors when refining the preferred alternative.

> *It would seem quantitative studies with respect to recreational patterns of low-income and non-Anglo populations are critical to land-use decisions and user capacity determinations in Yosemite Valley as well as elsewhere in the Park and would be an integral part of alternatives development. It is not clear in the DEIS whether any such studies have occurred or played a part with respect to any of the decisions in the preferred alternative.*
>
> (Individual; Correspondence #1617)

Response: Comment noted.

Concern 89: The NPS should coordinate with the Army Corps of Engineers to complete a wetland delineation for their review.

> *To ascertain the extent of waters on the project site, the applicatn should prepare a wetland delineation, in accordance with the "Minimum Standards of Acceptance of Preliminary Wetlands Delineations", under "Jurisdiction" on our website at the address below, and submit it to this office for verification. A list of consultants that prepare wetland delineations and permit application documents is also available on our website at the same location.*
>
> (Individual; Correspondence #2806)

Response: The Army Corps of Engineers has certified a number of wetland delineations in the MRP project area as a part of past project planning. Should additional wetland delineations be required, the NPS will ensure that Army Corps of Engineer certification is in place prior to project implementation as part of the permitting process. For overall conceptual planning at a larger scale, and to describe and analyze overall wetlands in the river corridor, the NPS used a compilation of data generated through the National Wetlands Inventory (USFWS 1996), the Yosemite National Park Parkwide Vegetation map (1997), and site-specific wetland delineations.

Concern 90: The NPS should coordinate with the Advisory Council on Historic Preservation, SHPO, American Indian tribes and groups, local governments, and other consulting parties in preparing Section 106 documentation regarding the nature and extent of the adverse effects caused by the proposal.

> *We recommend that the NPS prepare documentation to supplement the ongoing Section 106 consultation. Such documentation should include the following: maps illustrating the segments of the river; the location of all proposed activities in the selected alternative; historic property boundaries for buildings, structures, objects, sites, and districts; buildings/structures proposed for demolition; and location of new developments and restoration activities matrix of all proposed activities in the selected alternative; list of historic properties in the APE for each activity including eligibility status; list and description of adverse effects to historic properties, if any; conditions for no adverse effects to historic properties*
>
> *With the submittal of this documentation, the NPS should seek agreement with the SHPO, ACHP, Indian tribes, local governments, and other consulting parties on the nature and extent of the adverse effects caused by the program.*
>
> (Individual; Correspondence #29406)

Response: In accordance with the National Historic Preservation Act (NHPA), the NPS must consider avoidance and minimization of adverse effects which includes retention, relocation, or adaptive re-use of all irreplaceable cultural resources including historic buildings and structures. This consideration is conducted through consultation with the State Historic Preservation Office, the Advisory Council for Historic Preservation, traditionally-associated American Indian tribes and groups, and other consulting parties. The

NPS participated in numerous consultation meetings the above-mentioned agencies and groups regarding the effects of plan actions on historic properties. As a result of the consultation process, the NPS has negotiated a plan-specific programmatic agreement (Appendix I) that identifies measures to minimize and mitigate unavoidable adverse effects.

Concern 91: The NPS should determine the kinds and amounts of recreational uses that are protective of river values, and manage to those use levels to allow visitors to enjoy their national park, rather than simply eliminating recreational uses.

> *The NPS has mistakenly chosen to propose alternatives in the Merced River Plan that "solve" perceived management challenges of use (even when the Court has ordered the Service to set use limits to conserve values) by eliminating, not managing, use.*
>
> (Individual; Correspondence # 3550)
>
> *The 9th Circuit stated that the NPS failed to establish use limits. I submit the proposed Merced River Plan once again "fails" to meet the Order because it chooses to remove opportunities for visitor enjoyment rather than to manage the use in a manner that allows for park visitors to enjoy their national park. Rather than determine how much bicycle use is appropriate, the NPS proposes to eliminate opportunities for use in an assumption that "less" use and "fewer" opportunities will satisfy the Court, or previous litigants. How is a rented bicycle more, or less, impacting on park values then one brought into the Park by a visitor? This is never explained. If there is "impact" to park values by bicycles, how are those impacts mitigated by selecting only bicycles owned by the bicycle rider, rather than rented for a short time? This is not explained by the proposed plan.*
>
> (Individual; Correspondence # 3550)
>
> *Rather than determine how to manage stock use on trails, or what the appropriate use limits are, the NPS proposes to "solve" apparent conflicts between other trail users by eliminating the stock use. Where in the various laws, management policies and legislative background from Congress are the requirements that park visitors who use their feet on trails are somehow superior to those who ride on horseback? Where are the accommodations for those who are physically impaired, aged or infirm, or who meet the standards of impairment by the Americans with Disabilities Act of 1990 to access the wonders of the wilds of Yosemite? The NPS has opened itself up to future litigation by saying only those who are bipeds, "in shape," and capable of hiking or climbing steep grades out of Yosemite Valley on its trails are to "enjoy" the values for which Congress set aside Yosemite as a national park because of some other values of the Merced River.*
>
> (Individual; Correspondence # 3550)

Response: Alternative 5 (Preferred) in the FEIS no longer eliminates bicycle rentals. Bicycle rentals will be provided outside the corridor, and in a manner that reduces their costs, minimizes the development footprint, and encourages bicycle use to reduce congestion. Stock use has several impacts, such as dust, manure, smell, flies, and conflicts with other trail users. Without eliminating this traditional use, the FEIS proposes to reduce commercial stock use to provide higher quality hiking experiences and trail conditions.

NEPA—Public Involvement

Concern 92: The NPS should extend the public comment period due to the length and complexity of the *Draft Merced River Plan/EIS*.

> *I have read in the newspaper this weekend that a number of California Congressional representatives have requested that the NPS extend the comment period for the Merced River Plan by 90 days. Because of the length and complexity of the draft MRP, and the fact that it was issued for public review at the same time as the draft Tuolumne River Plan and Mariposa Grove Restoration Plan, I am sure that many members of the public would benefit for an extension of time to submit their comments. If the*

public would benefit, I believe that the park would benefit as well. Please extend the comment period not only to allow additional time for comments, but to demonstrate the willingness of the National Park Service to be responsive to the needs of the public.

(Individual; Correspondence #2133)

We believe the Merced river Plan comment period needs to be extended so that the public has a chance to read and understand this complex document and have adequate time to comment.

(Individual; Correspondence #2327)

Finally, I am aware that NPS has received a number of requests for an extension of the public comment period on the Merced River plan. This is entirely understandable given that the plan and its exhibits are over 4,000 pages long, and that the comment period overlaps with the comment periods on two other major Yosemite Park plans. To ensure that the public has an adequate opportunity to provide its input, I concur that an extension is necessary, and therefore have requested that NPS extend its public comment period on the Merced River Plan by 90 days to ensure full public opportunity to comment on this important issue.

(Federal Government; Correspondence #2702)

Response: The Council for Environmental Quality requires a minimum 45-day public comment period for all draft environmental impact statements. National Park Service policy requires a 60-day public comment period. For the Merced River Plan DEIS, the NPS announced a 90-day public comment period from January 8-April 18, 2013. In response to public request for an extension, the NPS extended the public comment period until April 30, 2013. In total the Merced River Plan DEIS public comment period was open for 112 days.

Concern 93: The NPS should provide a more informative summary guide to the Merced River Plan.

Regarding the communication of the this plan, I would hope that a better summary (vs. thousands of pages) be circulated to a wider audience in the future (i.e.- members of the Yosemite Foundation and campers who've reserved sites through Recreation.gov).

(Individual; Correspondence #1915)

Whether by intent or ineptness the Summary Guide is wholly inadequate as a tool for informing the public due to its nebulous wording, lack of specific information relative to the effects of the Alternatives, inconsistencies and conflicting information. The public should not be expected to read the 2,500 pages of the E.I.R. in order to understand what is actually meant by the information in the Summary Guide.

(Individual; Correspondence #2177)

Response: The NPS provided a summary guide, a suite of fact-sheets, a series of webinars, and a series of public workshops that included display posters to clearly communicate the Draft Plan to the public. The NPS will provide summary reference materials and hold a public meeting to communicate to the public about the major changes between the Draft and Final Plans.

NEPA—Alternatives

Concern 94: The NPS should adopt Alternative 6 or an alternative that has a higher user capacity and allows for future growth in visitation.

Of the alternatives presented, [the Tuolumne County Board of Supervisors] strongly supports Alternative 6. It best represents the Board's values, providing a wide array of outdoor opportunities. This alternative retains most of the existing services, and even enhances what Yosemite currently offers. A diversification of visitor activities is one of the features which makes Yosemite Valley so attractive to millions each year. While Yosemite encompasses nearly 1,200 square miles, most come to experience the

grandeur of Yosemite Valley, the exact location with a shortage of camp sites, lodging, and parking. Alternative 6 addresses these problems in an ecologically responsible manner. Pedestrian underpasses are proposed to enable safe walking paths and avoid vehicle conflicts. Alternative 6 is the only option which retains the current level of support for the popular Merced Lake High Sierra Camp.

(County Government; Correspondence #3114)

Response: Please see response to Concern 95.

Concern 95: The NPS should adopt an alternative that maintains or increases current levels of lodging and maintains existing commercial services.

Combine alternative 1 and 6, expand accommodations in park and keep or expand services.

(Individual; Correspondence #889)

I am disappointed that every alternative other that the "no change" removes the bike rentals, ice rink and Yosemite Lodge pool. If no alternative can keep the bike rentals, please pass the "no change" alternative

(Individual; Correspondence #2617)

I understand there may be some reasoning to move lodgings that are in danger of rock slides or flooding. However, I do not see a strong need to reduce the user capacity markedly as in Alternatives 2 and 3. It seems that Alternative 1 and 5 are similar in the camping and lodging, except primarily for the New Development of 210 camping sites. I am not sure what that plan is or it's benefits, but combined with the loss of commercial services and the cost of more than $235 million for Alternative 5, that does not seem like a good option. I therefore feel Alternative 1 is my preferred option, unless an Alternative 7 is added that maintains the commercial services, possibly increases lodging/ camping options and /or restoring some acreage at a far less cost than the $2-400 million alternatives being discussed.

(Individual; Correspondence #2650)

Response: The NPS has evaluated a range of alternatives that incorporate many of these suggestions, and maintains that Alternative 5 (Preferred) best meets the goals of providing visitor access and protecting resources.

Concern 96: The NPS should adopt Alternative 1 (No Action) because the current range of alternatives is insufficient.

In response to the Merced River Plan, my position is that no action should be taken and the plan should be redone, and, centered to the needs of the U.S. taxpayers and guests, who have always funded the park.

(Individual; Correspondence #2603)

As a 60-year visitor to Yosemite National Park, I am writing to strongly oppose Alternative 5 and strongly support Alternative 1.

My family is comprised of active, environmentally aware people who love nature and adore Yosemite National Park. We are appalled by the proposed changes. If approved, our Yosemite experience, and those of many other citizens, will be drastically diminished.

(Individual; Correspondence #2649)

Response: Alternative 1 (No Action) does not fulfill NPS's legal requirements under the Wild and Scenic Rivers Act. WSRA requires the NPS to adopt specific measurable limits on use that ensure the protection and enhancement of ORVs. Because Alternative 1 does not include a user capacity program that meets this requirement, it cannot be selected for implementation in the Record of Decision for this plan.

Alternatives 2 through 6 present a range of reasonable alternatives to address the purpose and need for this action, which is the development of a comprehensive management plan consistent with the requirements of WSRA and the *2009 Settlement Agreement*. These alternatives present different management visions for the river corridor, ranging from Alternative 2 which removes many major facilities from Yosemite Valley and other developed portions of the corridor and reduces use levels in some segments of the river, to Alternative 6 which would retain many of the facilities and services that exist today and allow for some increases in visitation levels. These variations exemplify the types of distinctly different choices presented in Alternatives 2 through 6 for the future management of the Merced River corridor.

Concern 97: The NPS should modify Alternative 5 (Preferred) to retain appropriate outdoor activities but limit new development.

> *The Merced River Plan and alternatives report is an excellent, comprehensive document. After reviewing the alternatives, I believe that the recommended Alternative (5) goes to far in terms of compromising the river ecosystem in order to allow public access.*
>
> (Individual; Correspondence #2572)
>
> *"The Concessions Management Improvement Act requires that contracts for visitor facilities and services 'be limited to those that are necessary and appropriate for public use and enjoyment' of the national park area in which they are located..."*
>
> *I believe that in Alternative 5, NPS is unnecessarily limiting the definition of "necessary and appropriate" facilities and services such that some very appropriate (and healthful) outdoor activities in Yosemite Valley will be discouraged. They may not be "vital visitor services," as noted in the MRP, but neither is anything else except food and lodging, so that's a weak argument. If they bring visitors in closer contact with nature and don't have a negative environmental impact, where's the problem?*
>
> (Individual; Correspondence #2607)
>
> *Keeping rafting and biking in the Valley are an integral part of the "Yosemite experience" but increasing campsites and parking only would do further harm to the fragile environment. Therefore, I strongly urge that Alternative 5 be modified or another option be considered.*
>
> (Individual; Correspondence #2637)

Response: Please see response to Concern 95.

Concern 98: The alternatives do not provide enough diversity or distinction from one another.

> *The proposed alternatives are seriously flawed. Alt 2 through 6 are not separate alternatives, they are variations. The lack of real alternatives will render your environmental document invalid. I strongly urge you to develop real alternatives to address the purpose and need. The range of alternatives should include alternatives I between alt 1 and 2. Yes improvements can be made, however the public has not been given a range of alternatives to consider. I request that the alternatives cover real choices, not just variations.*
>
> (Individual; Correspondence #1091)
>
> *All of the options proposed to protect the Merced River are too similar in concept and detail with the exception of the pro-forma option #1.*
>
> (Individual; Correspondence #2238)
>
> *In the judge's ruling of "Friends of Yosemite v. Kemthorne" on pgs. 3081 and 3082 sub-paragraph 5 the National Park Service has interpreted the sub-paragraph to mean that any traditional mercantile or recreational facility "within the river corridor" must be removed as unnecessary. In reality the judge's ruling was, and I quote: "NPS does not explain how maintaining such a status quo in the interim would protect or enhance the river's unique values as required under the WRSA."... Therefore the alternatives do*

not accurately fulfill the requirements outlined in the ruling of the court. They are simply reactionary to sub-paragraph five and all but # 1 sharing a single solution for compliance i.e. removal of all site based recreational and mercantile facilities from the river corridor. Because there are no options that answer the challenge of the court to explain how these site based facilities would add to the scenic or wild natural health of the river, there is no alternative that offers enough diversity for planning purposes or compliance to other responsibilities of the National Park Service i.e. providing for the relaxation and enjoyment of the park, providing handicap access to the park, and protecting historical use.

(Individual; Correspondence #2238)

The Park Service has completely failed to provide a reasonable range of alternatives. There is no alternative (other than the No Action) that allows for the continuation of day rides as currently allowed, nor is there an opportunity to increase the number of rides to accommodate the number of visitors who enjoy the experience to see and learn about Yosemite.

(Individual; Correspondence #3483)

Response: Alternatives 2 through 6 present a range of reasonable alternatives to address the purpose and need for this action, which is the development of a comprehensive management plan consistent with the requirements of WSRA and the *2009 Settlement Agreement*. These alternatives present different management visions for the river corridor, ranging from Alternative 2 which removes many major facilities from Yosemite Valley and other developed portions of the corridor and reduces use levels in some segments of the river, to Alternative 6 which would retain many of the facilities and services that exist today and allow for some increases in visitation levels. These variations exemplify the types of distinctly different choices presented in Alternatives 2 through 6 for the future management of the Merced River corridor.

In response to public comment, the NPS has revised Alternative 5 to retain facilities such as the ice skating rink and bicycle rentals. These and other changes made in response to public comment further differentiate Alternative 5 from the other action alternatives in the plan. The NPS believes that the range of choices presented in the action alternative is more than adequate under NEPA.

Concern 99: The NPS should adopt Alternative 2 to increase restoration and protect river values.

I strongly recommend that Alternative 2 be adopted in order to restore more degraded area and to preserve the river attributes which were well documented in the report.

(Individual; Correspondence #2572)

Response: Comment noted.

Concern 100: The NPS should create a new alternative that limits user capacity and does not increase parking or lodging.

What alternatives 5 and 6 fail to address is that Yosemite is ALREADY too crowded. Air quality, noise levels, traffic, water quality, wildlife habitat and trail use levels are already all significantly impacted by this overcorwding. No alternative that increases parking and acommodation should be considered.

(Individual; Correspondence #1014)

Suggest you develop a new alternative as follows. Take the current estimate of 3.2 million Valley visitors per year and divide by 365 days, for 8,767 visitors per day. Make this the maximum daily capacity for starters, and then monitor carefully to see if, in fact, the condition of river values is enhanced with this level of visitation. This will ensure that capacity is held to no more than about 3.2 million per year in the Valley, while allowing for increases in the shoulder seasons. It will end traffic jams, which will eliminate the need for costly road re-construction. If the condition of resources improves under this scenario, then consider increasing visitation. The draft states current overnight capacity is 6,564 people. For the moment, maintain the status quo in terms of lodging and camping. Remove campsites and lodging that

are too close to the river, remove shoulder parking along meadows-do all that positive ecological restoration work. And go ahead and create more camping in already developed areas to offset losses. And finally, establish a day use reservation system now-it is patently obvious that one is needed.

(Individual; Correspondence #2273)

Response: Alternatives 2 and 3 in the Draft Merced River Plan /EIS accomplish the objectives of reducing capacities and not increasing the total number of parking spaces and/or lodging units in Yosemite Valley.

Concern 101: The NPS should implement a modified version of Alternative 3 in order to best meet the requirements of its complex legal framework.

... A MODIFIED ALTERNATIVE 3 CAN AVOID CLEAR LEGAL VIOLATONS THAT WOULD MAKE SELECTION OF THE PREFERRED ALTERNATIVE HIGHLY VULNERABLE IN COURT. ... The guiding principles of Alternative 3 focus on restoration of large portions of the floodplain and the riparian area within 150 feet of the river. Alternative 3 would accommodate lower maximum visitor use levels than high visitor use periods of recent years, and it would offer a lesser degree of commercial services and facilities. But the quality of the visitor experience would no longer be diminished or degraded during the busy summer season because visitor use levels would be managed for dispersed visitor experiences with a significantly reduced amount of crowding and congestion. ... Modified Alternative 3 would cost less initially than Alternative 5 and would cost far, far less than the Preferred Alternative for annual recurring costs of non-facility operational costs (8-326). . . . The bottom line is that the Park Service has multiple legal mandates that direct the Park to follow the General Management Plan, the Wild and Scenic Rivers Act, and various other regulatory requirements. Either the Park must adopt Alternative 3 or a similar alternative that reduces legal conflicts between Park actions and legal directives, or the Park must adopt Modified Alternative 3 that meets those legal mandates, but softens some of the actions, changes, adjustments, and removals of facilities.

(Individual; Correspondence #2212)

Response: All of the action alternatives in the plan are consistent with the Wild and Scenic Rivers Act mandate to protect and enhance ORVs and with the requirements of the 2009 Settlement Agreement. Figure 1-2 of the plan depicts how the various chapters of the plan address the requirements of the Act. The information contained in those chapters presents the analysis and information required by the Act. The NPS notes the commenter's preference that a modified version of Alternative 3 be adopted in the Record of Decision.

Concern 102: The NPS should consider an alternative that better preserves historic resources, and demonstrates it is not necessary to prioritize the protection and enhancement of natural resources over cultural resources under the Wild and Scenic Rivers Act.

... all of the alternatives proposed by NPS will harm historic resources, and by NPS's own admission, the no action alternative is the least damaging to historic properties. As a result, the National Trust cannot endorse any of the proffered alternatives because of the magnitude of the negative impacts that each of the alternatives will have on historic resources. ... The large majority of significant adverse impacts anticipated under the preferred alternative would harm cultural resources in particular – potentially over 100 historic properties. In fact, cultural resources appear to be the only resource class that fares worse under the preferred alternative than under the no action alternative. ... The degree to which cultural resources as a group fare worse than other non-cultural river values and resource types is striking. Table 9-259 (Merced Wild and Scenic River Plan Alternative Summary Table) summarizes impacts of the six proposed alternatives across eighteen "analysis topics." Three of the eighteen analysis topics (16 'Historic Buildings, Structures, and Cultural Landscapes; 17'Archeological Resources; and 18'American Indian Traditional Cultural Resources) focus on impacts to cultural resources. The sum of all moderate and major adverse impacts to cultural resources across the action alternatives is an astonishing 56, half of which are "moderate to major" or "major." In contrast, the sum for adverse impacts to non-cultural resources is 18, all of which are moderate at worst. ... The fate of cultural

resources under the preferred alternative offers a stark and disturbing contrast. The three cultural resource analysis topics (16, 17, & 18) include a total of ten adverse impacts (as compared to four in the case of non-cultural resources), including four cases of potential or probable major adverse impacts (as compared to none in the case of non-cultural resources). Historic Buildings, Structures, and Landscapes in Yosemite Valley (Segment 2) are especially hard hit under the preferred alternative.

(Civic Group; Correspondence #8328)

We are concerned that the alternatives provided in the MRP do not satisfy the National Park Service's preservation stewardship responsibilities. Existing law and policy requires the National Park Service to preserve the historic resources located within Yosemite. . . . The Draft MRP proposed by the Park Service will adversely affect a host of historic Park properties. The plan's proposals could result in the demolition or removal of more than 100 historic properties in Yosemite National Park, ranging from the Sugar Pine Bridge, to cabins in Curry Village, to the first Superintendent's house (Residence 1), to the historic apple orchard at Curry Village. ... Because of the negative impacts to historic resources, the National Trust opposes NPS's adoption of any of the action alternatives, including the preferred alternative (Alternative 5: "Enhanced Visitor Experience and Essential Riverbank Restoration"), because each of these action alternatives, if implemented, will result in unnecessary and unacceptable adverse effects to historic properties.

(Civic Group; Correspondence #8328)

Response: Alternative 1 (No Action) is the most protective of historic properties and structures because it does not call for any demolition or introduction of non-historic features within historic districts. However, this alternative does not fulfill NPS's legal requirements under the Wild and Scenic Rivers Act. WSRA requires the NPS to adopt specific measurable limits on use that ensure the protection and enhancement of ORVs. Please see the response to Concern 96 for additional detail.

In response to public comment, the NPS has included a Yosemite Valley Historic Resources ORV in the *Final Merced River Plan/EIS*. The NPS has also modified Alternative 5 to retain Sugar Pine Bridge and the majority of the historic tent cabins in Boys Town. While the preferred alternative will result in adverse effects to historic properties, the NPS, together with the SHPO, ACHP and consulting parties, have developed a Programmatic Agreement as part of the Section 106 consultation process that includes terms and conditions to resolve adverse effects to historic properties.

Concern 103: The NPS should include alternatives that avoid impacts to wetlands or other waters of the United States, should restore and maintain the largest possible natural corridor for the Merced River to ensure its full restoration within the 100-year floodplain, and should fully restore the Wawona Meadow.

The range of alternatives considered for this project should include alternatives that avoid impacts to wetlands or other waters of the United States. Every effort should be made to avoid project features which require the discharge of dredged or fill material into waters of the United States. In the event it can be clearly demonstrated there are no practicable alternatives to filling waters of the United States, mitigation plans should be developed to compensate for the unavoidable losses resulting from project implementation. The Corps of Engineers supports the alternative that restores and protects the most waters of the United States, including wetlands, for this project. It is important to restore and maintain the largest possible natural corridor for the Merced River to ensure its full restoration within the 100-year floodplain. We also support full restoration of the Wawona Meadow.

(Federal Government; Correspondence #2806)

Response: The range of alternatives considered for this plan includes alternatives that avoid impacts to wetlands or other waters of the United States. Alternatives 2-4 all restore sizeable and highly valued wetland communities, and Alternatives 2 and 3 restore the Wawona Meadow. Actions within the range alternatives

could, however, also have minor adverse impacts on existing wetlands. Although Alternative 5 (Preferred) does not fully restore the 100-year floodplain or the Wawona Meadow, it best meets the purpose and need of the plan.The NPS will continue to avoid impacts to wetlands through the project design stage, and ensure no net loss of wetlands, in consultation with the U.S. Army Corps of Engineers and the NPS Water Resources Division.

Concern 104: The NPS should increase camping in the preferred alternative, with an equivalent reduction in lodging, which would approximate the same overnight capacity proposed in Alternative 5 (Preferred).

> *The Preferred Alternative Should Provide Additional Camping Opportunities*
>
> *The Access Fund supports the direction reflected in Preferred Alternative 5 ("enhanced experiences and essential riverbank restoration"), which increases camping opportunities 37% from current conditions. We also support all the proposed additional camping-related actions in Alternative 5 or which are common to all alternatives. These are:*
>
> *- Camp 4: Retain 35 existing walk-in campsites and the construct an additional 35 walk-in sites east of the existing parking facility;*
>
> *- A "new" Upper River Campground: 30 walk-in sites;*
>
> *- West of Backpackers Campground: 16 walk-in campsites;*
>
> *- Upper Pines: 49 walk-in campsites, 2 group campsites, and 36 RV sites; and*
>
> *- Eagle Creek: 40-drive-in and 2 group sites (but see our proposal below to change the drive-in sites to walk-ins and make them available on a first-come, first-served basis).*
>
> (Civic Group; Correspondence #3689)
>
> *We also ask Yosemite planners to consider adding to the Preferred Alternative up to seven additional camping locations in the East Valley with a potential for 204 new individual sites and 2 new group sites. An equivalent reduction in lodging units would maintain, or at least approximate, the overnight capacity in Proposed Alternative 5.2*
>
> (Civic Group; Correspondence #3690)

Response: One of the issues identified during scoping was to maintain or expand upon the existing campgrounds in Yosemite Valley. Therefore, during alternatives development the park planners looked for areas where camping could be developed without impacting to ORVs. As a result of this objective, all alternatives increase the proportion of camping in overnight accommodations in Yosemite Valley from the No Action alternative (29%), with the greatest proportion of camping in Alternative 4 (46%). This balance between campgrounds and lodging has to consider the trade-offs with land use allocations and restoration objectives as campgrounds typically take up more space that hotels for the same number of visitors. To achieve the same capacity as alternative 5, with a greater proportion of camping, would have required the park to reduce or remove restoration objectives and could have put ORV's in jeopardy.

Concern 105: The NPS preferred alternative should expand visitor use and visitor services.

> *We cannot support the preferred alternative and strongly believe that the full array of alternatives required by the National Environmental Policy Act has not been considered in the plan's development. The NPS scoping process apparently discounted the value of, and the opportunities for, expanded public use of the Merced River corridor. This is not right. We believe that Alternative 5 can and should be modified significantly to include available strategies and facilities for an expansion of visitors and visitor services.*
>
> (Unaffiliated Individual; Correspondence #3529)

Response: Please see the response to Concern 221.

River Values and Restoration

Park Management—Restoration/Stewardship

Concern 106: The NPS should ensure new development is concentrated in previously disturbed areas.

> *Do not remove/mediate already impacted areas only to remove trees and put more pavement elsewhere! (Taft Pt) (Upper Pines campground)*
>
> (Unaffiliated Individual; Correspondence #70)

Response: The *Final Merced River Plan/EIS* will limit most construction activities to sites that have been developed or disturbed in the past. The *Draft Merced River Plan/EIS* initially proposed campground development at Eagle Creek and a staging area at El Capitan Crossover in the West Valley, but those concepts are no longer included in Alternative 5 (Preferred). In Alternative 5, the NPS is proposing camp sites and parking areas in previously disturbed areas, such as Upper Pines Campground, Upper and Lower River Campgrounds, Yosemite Village Day-Use Parking Area and west of Yosemite Lodge.

Concern 107: The NPS should not conduct any additional restoration within the park, as sufficient areas are already being restored and restoration limits visitor access.

> *I don't agree that we need to restore additional acres of meadow and riparian habitat in the valley: there is enough already.*
>
> (Individual; Correspondence #768)
>
> *Please, NO MORE RESTORATION! This just makes pretty areas unaccessible to the people that the park is here for.*
>
> (Individual; Correspondence #29336)

Response: National Park Service policies include allowing natural processes to prevail and protecting and enhancing natural resources. In places within the river corridor, a multitude of social trails crisscross meadows and stream banks are denuded from trampling. Restoring soils and native plant communities will provide habitat for Yosemite wildlife, add nutrients to aquatic systems, and provide a quality experience for visitors. Visitors will still be able to access meadows, and where necessary, boardwalks will be provided to ensure visitor access while protecting sensitive habitat. River access will be directed to sand and gravel bars where the substrate is durable enough to accommodate visitor use without damage to the resource.

Concern 108: The NPS should focus more effort on restoring and enhancing Black oak woodland habitat.

> *As far a restoration goes, I think more should be done to enhance the Black Oak woodlands in the Valley. Removing more conifers that are beyond the reach of low intensity prescribed fire, and get these areas closer to a natural condition.*
>
> (Individual; Correspondence #576)

Response: The Park continues to mechanically remove young conifers in some groves to maintain the cultural landscape of relatively pure black oak stands in a number of areas in the Valley. We are also actively introducing new young black oak trees into many groves in the Valley to replace adults lost to mortality since recruitment of young oaks is not occurring in sufficient numbers without our intervention.

Concern 109: The NPS should remove the segment of Southside Drive that bisects Stoneman Meadow to correct biological impacts and enhance sheet flow and meadow connectivity.

> *I don't really see a problem with rerouting Southside drive to avoid the meadow as proposed in options 2 and 3, unless this adversely affect traffic patterns at the higher use levels.*
>
> (Individual; Correspondence #95)
>
> *Stoneman Meadow Enhancement – This alternative calls for applying "engineering solutions to promote water flow and to increase drainage to Stoneman Meadow". A former plan for this area called for the removal of Southside Drive through Stoneman Meadow for the same reason. Based on this former plan the underground utilities that were along this road corridor have been relocated through the Curry Village Parking lot. Why is the removal of Southside Drive through Stoneman Meadow not included in this plan? Removal of this segment of road would definitely promote water flow through the meadow. Removal of the road would require the relocation of the campgrounds entrance road through Boys Town, which is feasible since it has already been partially designed.*
>
> (Individual; Correspondence #1690)
>
> *The 1335 feet of Southside Drive that goes through Stoneman Meadow should be removed to reconnect the meadow and floodplain and to better protect river values. Any road that bisects a meadow creates a range of biological effects, and the impact of Southside Drive on Stoneman Meadow is clearly undesirable. There is the direct runoff of petroleum products, air pollutants, and other degradation that washes into the meadow issue of hydrologic connectivity being broken and the severed flows no longer wetting the entire meadow as would naturally occur. - Prohibiting roadside parking along that portion of Southside Drive does not protect the river from the impacts created by the road itself.*
>
> (Individual; Correspondence #2210)

Response: The NPS acknowledges that rerouting Southside Drive outside of Stoneman Meadow would have major beneficial impacts on the ecological integrity of this meadow. This action would also enhance the iconic views from the meadow to Half Dome, Washington's Column, and Glacier Point. While other alternatives in the DEIS propose removal of the road through Stoneman Meadow, Alternative 5 (Preferred) does not include this action because further study is necessary to determine whether emergency egress from the east end of the Valley would be acceptable under Alternative 5. The NPS will conduct a transportation and engineering study regarding the potential of removing Southside Drive thru Stoneman Meadow. Underground utilities have already been relocated in preparation of the potential removal of this road segment, and no actions that preclude the road removal and relocation are proposed in Alternative 5. In the interim, the road will remain and design and engineering solutions will be applied to promote water flow and improve meadow health.

Park Management—Restoration/Stewardship—Riparian Restoration

Concern 110: The NPS should restore the free-flowing condition of the river by removing bridges that constrict the river channel.

> *Finally, I really believe the restoration of the proper river channel at Sugar Pine bridge and the meadow restoration at El Cap and other places is what Yosemite is really all about. Sugar Pine bridge is a bridge to nowhere and it is a duplicate of the Ahwahnee Bridge. I recall the Merced River did not like the SPB and cut its own channel recently. Can we prevent this in the future? The random channel it cut is ugly. In fact, I would support also removing the Ahwahnee Bridge and the berm between the bridges.*
>
> (Individual; Correspondence #3267)

Response: Under Alternative 5 (Preferred), all historic bridges including the Sugar Pine Bridge would remain in place for the near term. The park would commission a third party study concerning hydrologic impacts of

Sugar Pine Bridge. To address the localized impacts that have been attributed to Sugar Pine Bridge, the NPS will initiate a study to assess the merits of various long-term bridge management strategies. The study will first assess the nature and extent of impacts associated with the bridge, and then identify and test potential mitigation measures. If mitigation measures fail to meet defined criteria for success, consideration of bridge removal would involve a public review process and additional environmental compliance.

Park Management—Restoration/Stewardship—Meadow Restoration

Concern 111: The NPS should reduce impacts to meadows by limiting parking adjacent to meadows instead of erecting fences and signs.

Parking along El Capitan Meadow should be regulated and concentrated, as in Alternative 2, to best protect the meadow. El Capitan Meadow has one of the highest concentrations of invasive plants, which can be partially attributed to roadside parking and the proximity of the available Parking to the meadow.

(Individual; Correspondence #2212)

My suggestion is too take that long strip of parking along the meadows away. Then there would be less foot traffic and might think twice about walking the distance. There are so many people that just drive and stop and drive and stop, and only get out to look or photograph the easiest of areas to walk.

(Individual; Correspondence #2428)

El Capitan Meadow would be better served by moving parking away from the area so that individuals would have to walk a distance to view it. Cluttering up the place with signs can only distract from such a unique view...

(Individual; Correspondence #2456)

I think that moving the parking lot a little further from the meadow would really help preventing human footsteps.

(Individual; Correspondence #2457)

I support removing parking from El Capitan meadow to reduce wear and tear on the meadow but allow it to stay open to foot traffic.

(Individual; Correspondence #2557)

Possibly moving the parking so that people have to cross the road would cut down on the number of people and help preserve the meadows ... I do believe that there are too many cars in Yosemite and that they may be doing more damage to the environment and meadow than people walking in the meadow.

(Individual; Correspondence #2610)

I believe that the best option to protect the meadow and yet preserve the experience of Yosemite is to move the parking further away from the meadow, thereby reducing foot traffic to this site.

(Individual; Correspondence #2657)

The current proposal of limiting or eliminating access to the Meadow would make it difficult or impossible to enjoy photographically.

I propose the following changes to mitigate potential damage to the meadow:

1. *limit nearby parking to those with valid and legal disabled placards only.*
2. *make a boardwalk for handicapped use only.*
3. *Require all visitors to the meadow to park at least a half mile away; these visitors would be allowed access to all parts of El Cap Meadow as they can today.*

(Individual; Correspondence #3010)

Response: The NPS intends to remove much of the roadside parking adjacent to meadows in Yosemite Valley. Also, a variety of options are being considered to best protect Yosemite Valley's meadows from the impacts associated with trampling via foot traffic. Informal parking along meadows such as Cook's meadow will be removed therefore reducing foot traffic into the meadow. In El Capitan meadow, the restoration plan will address access issues through a combination of roadside curbing, some split rail fencing and boardwalks. The overall design will still accommodate visitors in the meadow while greatly reducing trampling impacts to the most sensitive and highly used areas of the meadow. Visitors will be directed towards less sensitive areas of the meadow and towards boardwalks and viewing platforms. These actions will concentrate visitor use in areas that reduce meadow impacts, limit introduction of non-native species and greatly reduce habitat fragmentation.

Concern 112: The NPS should reduce impacts to meadows by limiting foot traffic during certain times of the year.

> *If vegetation growth is an image, close the meadows to foot traffic during the spring, i.e. March 15 – June 15 to allow plants to gain the strongest foothold without trampling.*
>
> (Individual; Correspondence #2402)
>
> *Restricting (not eliminating) the amount of people in the meadow is the best solution for your conservation concerns. Removing excess parking, giving meadows 'rest days' or 'rest weeks' (using signage, etc.), adding a limited number of paths or boardwalks (w/o signage - most visitors would stay on them - serious photographers would want to meander a bit), and requiring 'passes' are just a few ideas that would go a long way to preserving the meadows.*
>
> (Individual; Correspondence #2420)

Response: Recreation ecology research has demonstrated that informal trails can form with only a small amount of repeat use. With repeat use, trail impacts can occur even with much lower numbers of visitors. Soil compaction, one of the impacts from trampling, can occur throughout the year and can limit the potential for plant growth. Seasonal closures of Yosemite Valley meadows would not benefit meadow health as much as a combined effort of restoration and education. The NPS aims to reduce fragmentation impacts through the removal of redundant trails and highly compacted trails through sensitive meadow habitats, reducing road side parking and by adding boardwalks to the most highly visited and threatened areas of meadows.

Concern 113: The NPS should not erect fences or signs as part of meadow restoration because that would impact visitor experience to Yosemite.

> *The quintessential Yosemite experience is to wander out into a meadow, stare up at the cliffs and waterfalls, and soak up the tranquility. I would hate to see that experience taken away. There has to be a better solution than fencing and "Keep Out" signs for the valley's meadows.*
>
> (Individual; Correspondence #2609)

Response: Please see response to Concern 143.

Concern 114: The NPS should consider alternatives to mitigate impacts to meadows, such as raised boardwalks or increased visitor education.

> *Do not remove impromptu trails in meadows. Those trails exist because a fair number of people use them as they seem to connect places where people want to go. Instead of removing them as in some of the plans, convert them to boardwalks.*
>
> (Individual; Correspondence #125)

When I lived there, Cooks meadow had elevated wooden paths through some parts of it so people could still get the feeling they were walking through the meadow without leaving their footprints. Couldn't something like this be done in El Capitan meadow to?

(Individual; Correspondence #2380)

Some thoughts on responsible access to areas between the river and the meadows would be:

- *Better information handed out to park visitors at entrance stations about the importance of not trampling the meadows*
- *Permits for access to edges of meadows and river banks for a limited num*

(Individual; Correspondence #2479)

In my national and state park travels I have noticed that most park visitors get out of their cars, take a quick picture, wander not too far from their vehicle, get back in and drive away. I wonder if moving the parking areas that currently run along the side of the meadow might be of some help. I think foot traffic would be reduced substantially and we could perhaps avoid having to close this most precious area to all.

(Individual; Correspondence #2624)

Response: Please see response to Concern 113. Additionally, the design concept for El Capitan meadow includes boardwalks as part of Alternative 5 (Preferred). The boardwalk design incorporates several studies that have examined use patterns of visitors in this meadow. This will allow the park to protect sensitive areas of the meadow while still preserving the visitor experience of visiting the meadow and viewing the cliffs above. The restoration design will also incorporate visitor access, parking and location of shuttle stops to best protect the most vulnerable areas of the meadow from trampling impacts due to both sensitivity of vegetation and proximity to parking. Increased visitor education about these new efforts will be key to their success.

Resources—Natural

Concern 115: The NPS should conduct studies to assess the condition of native species that are most vulnerable, most at risk, or potentially extirpated from within the River corridor.

... Park staff has failed to comply with our Center's request for Park staff to undertake studies to assess the status of known native species that are most vulnerable, most at risk, or potentially extirpated from within the River corridor. No studies have been done for the majority of such species.

(Individual; Correspondence #2211)

Response: None of the park's most at-risk species are river-dependent, or inextricably tied to the river corridor. However, Yosemite currently has projects that are aimed at assessing the condition of Sierra Nevada yellow-legged frogs, Yosemite toad, great gray owl, peregrine falcon, and Pacific fisher as our highest priority species. In the case of the frogs, we have an active restoration program that will continue indefinitely, given the precarious status of this species. Projects that address other priority species are developed as funding and staffing become available.

Concern 116: The NPS should comply with the Wild and Scenic Rivers Act (WSRA) by prioritizing the protection of natural resources within the Merced River corridor over visitation, lodging, recreational and administrative uses.

A legal, sustainable, and responsible Merced River Plan will place protection for the resources of the river corridor and of Yosemite Valley, El Portal, and Wawona as the pre-eminent priorities, with

visitation, lodging, and all the other recreational and administrative uses allowed to the degree that the interwoven Valley and Merced River ecosystems are highly protected and recovering

(Individual; Correspondence #2207)

If the Merced River Wild and Scenic River Management Plan should ever be evaluated by a court for compliance with legal regulations, CSERC strongly asserts that the court will agree that the Park's desire to provide convenient (and highly profitable) lodging or amenities should never trump compliance with the Wild and Scenic Rivers Act (WSRA).

(Individual; Correspondence #2207)

Allowing for an increase in visitor use as would occur in the Preferred Alternative would negatively affect habitats and wildlife that are already stressed from human activities. Specifically the intention to add the overflow West Valley parking area (p 9-425) would ripple human disturbance out into a new area. The increase in overnight accommodations in Yosemite Valley (p 9-425) and other elevated user capacity provisions would mean more people out and about in the various habitat areas of the Valley.

(Individual; Correspondence #2211)

Response: Under WSRA, the NPS is required to protect and enhance the river's outstandingly remarkable values. As explained in "River Values and their Management" (Chapter 5), the NPS followed guidance from the Interagency Wild and Scenic Rivers Council in determining which features of the river were outstandingly remarkable. Not all natural resources in the river corridor met this definition. However, those natural resources that were outstandingly remarkable were included in the Biological, Geologic/Hydrologic and Scenic ORVs as appropriate. The NPS also followed the direction of the Interagency Council in determining which recreational pursuits were appropriate for inclusion in the Recreational ORV for river segments 1 and 2. Alternatives 2–6 presented in the plan allow for visitation, lodging, and administrative uses provided that these uses do not adversely affect or degrade the river's ORVs, including those natural resources that are components of a particular ORV.

Concern 117: The NPS should not rely so heavily on CRAM for its monitoring program, as this tool may have similar legal deficiencies as VERP, allowing resources to fall below a management standard before management action is taken.

As NPS concedes, the version of CRAM that NPS plans to use for analyzing wet meadows is (1) still being developed and (2) "best used in combination with quantitative measures." DCMP/EIS 5.32-33. ... NPS relies upon CRAM to provide a "qualitative evaluation of meadow condition[s]" even as it notes that, for wet meadows CRAM works best "in combination with quantitative measures." 5.32-33. Yet NPS fails to identify the quantitative measures it plans to use with CRAM. Id. As noted, the DCMP/EIS admits that CRAM is not specifically tailored for wet meadow monitoring, but yet it fails to consider any substantive alternatives. DCMP/EIS 5.32-33 (wet meadows version of CRAM in development). Nor does the DCMP/EIS include analysis sufficient to ensure that NPS' reliance on CRAM is justified. Thus it is foreseeable that CRAM may overlook significant degradation, and allow River segments to fall below appropriate management standards. As it stands, NPS has not shown that its reliance on CRAM will successfully protect the River's ORVs. NPS must correct this flaw before it approves a CMP for the River.

(Civic Group; Correspondence #2945)

The Ninth Circuit has repeatedly admonished NPS about employing inadequate indices to measure compliance with WSRA. For example, in 2008 the Court forbade NPS from exclusively relying on a similarly deficient assessment method, called Visitor Experience and Resource Protection ("VERP"), warning that "VERP requires management action only when degradation has already occurred, and is therefore legally deficient." ... critics have suggested NPS improve VERP by mandating management measures when it appears that a standard may soon be violated (i.e., before, not after, the standard or threshold is exceeded).9 CRAM suffers from similar flaws, because it does not identify departures from

management standards before they occur. ... Thus it is foreseeable that CRAM may overlook significant degradation, and allow River segments to fall below appropriate management standards. As it stands, NPS has not shown that its reliance on CRAM will successfully protect the River's ORVs. NPS must correct this flaw before it approves a CMP for the River.

(Civic Group; Correspondence #2945)

Response: The CRAM score for riparian condition is being used as only one component of the management of Biological ORV in segment 2 (Yosemite Valley). This includes defining quantitative measures for three trigger points, management standards, adverse impact, and degradation. When the trigger points are reached, then the NPS will act as defined in the plan to reverse the negative trend. CRAM is sufficiently sensitive to identify poor, moderate, and good conditions at the 200-meter river reach scale as shown in Cardno-ENTRIX (2012). CRAM scores indicate that the second trigger point has been reached and the NPS will correct this condition upon implementation of the plan. Other alternate secondary assessment tools with specific protocols are currently in development.

Concern 118: The NPS should invest in resources that support the identification, documentation, and remediation of degraded natural resources within the Merced River corridor because the finding of "no degradation" is inaccurate and unacceptable.

CSERC STRONGLY disputes the accuracy of statements ... that no degradation has been found in the river corridor. That is simply not correct. As spelled out in the Secretarial Guidelines, degradation includes both past and present impacts. There is no arguing that certain species native to Yosemite Valley and the Merced River corridor have been crowded out, killed off, or otherwise harassed to the point that they are seldom or never seen in the Valley or elsewhere in the river corridor at the present time. ... certain "common" wildlife species were once known to be visibly present in the River corridor and now appear to be wiped out or at such low numbers that they are not known to persist. Native riparian wildlife species have disappeared. The loss of the western pond turtle, the foothill yellow-legged frog, the willow flycatcher, the harlequin duck, and the great gray owl from the aquatic, riparian, and meadow habitats along the river corridor in Yosemite Valley and along the South Fork is a loss that is a classic example of degradation.

(Individual; Correspondence #2211)

First and foremost, I want to express that the Park's finding of "no degradation" of the Wild and Scenic Merced River Corridor to be entirely false and inaccurate. To claim that bridges that constrict flows and cause serious harm to the river's natural processes and free flowing condition are not a degradation of the corridor leads one to wonder if the Park knows what "degradation" really is. In addition, the loss of significant wildlife species from Yosemite Valley is a degradation, to put it lightly. The fact that I can no longer walk along the banks of the Merced River in the Valley and see Western Pond Turtle or Willow flycatcher represents a serious degradation of the river ecosystem as well as my visitor experience.

(Individual; Correspondence #3412)

Response: Neither the Wild and Scenic Rivers Act nor the Secretarial Guidelines define the term degradation. The plan uses a definition of the term degradation that comports with its common everyday meaning. (See, "River Values and their Management" [Chapter 5].) The plan defines degradation as "the state in which a river value has been fundamentally altered by public use or development to the point that its value is lost for at least a decade."

The NPS translated this definition into a set of scientifically-based measurable conditions that, if detected, would mean that an ORV was in a degraded condition. The conditions that constitute a degraded state for each ORV are identified in Chapter 5. As part of the monitoring program associated with the plan, the NPS also adopted indicators and standards for each ORV that are set well above the point of degradation or

adverse impact. Monitoring data related to these indicators and standards are currently being used to assess the condition of each ORV. Data from monitoring efforts conducted to date indicate that none of the ORVs are in a degraded state.

Concern 119: The NPS should strengthen the monitoring program because it lacks the resources to ensure adverse impact to resources will be detected and corrected before they occur.

> *NPS' insistence on using such a defective tool to evaluate its management measures is inexcusable. The Ninth Circuit has repeatedly admonished NPS about employing inadequate indices to measure compliance with WSRA. For example, in 2008 the Court forbade NPS from exclusively relying on a similarly deficient assessment method, called Visitor Experience and Resource Protection ("VERP"), warning that "VERP requires management action only when degradation has already occurred, and is therefore legally deficient." Friends of Yosemite Valley v. Kempthorne, 520 F.3d 1024, 1034 (9th Cir. 2008) (emphasis added). Even NPS staff has questioned the effectiveness and adequacy of VERP.8 These critics have suggested NPS improve VERP by mandating management measures when it appears that a standard may soon be violated (i.e., before, not after, the standard or threshold is exceeded).9 CRAM suffers from similar flaws, because it does not identify departures from management standards before they occur.*
>
> *In spite of CRAM's obvious flaws, NPS relies on CRAM to function as the baseline for environmental degradation throughout the Merced River area. DCMP/EIS 5.22 (subsequent monitoring of riparian conditions tied to CRAM), 5.42 (relied on to indicate meadow recovery), 5.45 (establishing baselines), 5.47, 5.48 (management and degradation standards), 5.49 (monitoring standards and triggers), 5.64-68 (indicators for geological and hydrological ORVs), 6.20-21 (user capacities), 8.290 (monitoring of riparian conditions).*
>
> (Civic Group; Correspondence #2945)
>
> *Worse yet, the monitoring plan looks like the same voodoo science in the prior plan. In simple terms, the lack of boots-on-the-ground resources and insufficient funds simply guarantees late detection of deterioration - meaning that adverse changes will occur and will take extreme and emergency measures and extreme amounts of money to correct. We have already seen this. The lack of honest and documented specific remediation commitments highlights how serious the issues will become.*
>
> (Individual; Correspondence #3490)

Response: Throughout the planning process, the NPS has continued to improve and refine all of the indicators and standards. All indicators have been developed to represent the best available assessment tools that are feasible and efficient within reasonable funding expectations. All indicators are designed to detect change well before degradation occurs and outline specific management tools to protect and enhance river values. Current sampling during the 2012-2014 field seasons will determine whether conditions are nearing management standards and identify appropriate management actions. In cases where conditions are already nearing adverse effect, corrective actions are identified in the plan. To ensure long term monitoring of all indicators, the budget needed to maintain the monitoring program has been identified within the operational budget needs for the life of the MRP.

Concern 120: The NPS should not allow degradation on a localized-level because the outstandingly remarkable value is protected at the segmentwide-level.

> *Justification for allowing a degradation because the value is protected "segmentwide" is unacceptable. Dilution is not the solution to pollution, and to claim that an adverse effect can go on, such as the effects from undersized bridges, because the river is free-flowing on a segment-wide basis is analogous to diluting the pollution.*
>
> (Individual; Correspondence #3412)

Response: "River Values and Their Management" (Chapter 5) discusses each river value and identifies areas where localized concerns or management concerns are present. Enhancement actions are identified in Chapter 5 that are necessary to mitigate these concerns. These actions have been incorporated into actions common to all alternatives (See "Alternatives-Actions Common to Alternatives 2-6" [Chapter 8]). Thus, all action alternatives will address localized impacts to river values, thereby protecting and enhancing these values.

Resources—Natural (Wildlife)

Concern 121: The NPS should adopt an alternative that will increase the potential for long-term viability of rare wildlife populations in the park.

> *1. Great gray owl: The wide range of noise generated by human activities often has radiating impacts for species such as the owl that are easily disturbed and that go to extremes to avoid noisy humans. Increased noise caused by traffic and crowds may also have the potential to hamper the birds' ability to successfully hunt for prey. This species is found in other Yosemite Park meadows where human presence is not dominant. As presented by Sarah Stock at the recent Yosemite Gateway Partners session, the great gray owl may number as few as 200 total individuals in all of California. Thus it stands that NPS should act to select an alternative that would act to INCREASE the owls success, population, and potential for long-term sustainability. Reducing visitor nu xmbers would help with this (p 9-339).*
>
> (Individual; Correspondence #2211)
>
> *Bats: Increases in human activities in Segments 3 &4 would have a negative effect on many "special status bat species." (p 9-348) Bats are under significant human-generated stresses throughout their range, even in relatively undeveloped areas of the Sierra Nevada. Any additional protection given to riparian and meadow habitats by Alternative 3 compared to Alternative 5 will clearly benefit numerous at-risk bat species.*
>
> (Individual; Correspondence #2211)
>
> *Willow flycatchers: Once a frequent Park nesting species, sightings are now rare. In comparison with Alternative 3 and other alternatives with more restoration planned, the reduced amounts of riparian restoration shown in Alternative 5, only 203 acres and only 100 feet from the river (p E-31 Apppendix E) are not supportive of the NPS memorandum "to restore and enhance migratory bird habitat" (p 9-339). Alternative 3 not only provides for 302 acres but "provides for significant restoration within 150 feet of the river" (p E--26) which is much more in keeping with the memorandum as Willow flycatchers require riparian tree and shrub species such as willows, alders and other deciduous species. Additionally, Alternative 3 would "reduce recreation allowing for increased resource restoration" (p 9-397).*
>
> (Individual; Correspondence #2211)
>
> *Alternative 3 is a superior alternative for wildlife compared to the Preferred Alternative because the decreased amoun*
>
> (Individual; Correspondence #2211)

Response: The increased protection and restoration of riparian and meadow habitat the MRP affords, such as the establishment of a development-free riparian buffer and restoration of streambanks, would result in a net benefit to wildlife by increasing the amount and quality of these diverse and productive habitats to support both sensitive and common species.

Concern 122: The NPS should continue to monitor amphibian populations within Yosemite National Park due to their widespread decline.

> *I hope you continue to monitor the amphibian populations, as they are in trouble everywhere. In all, Yosemite is a wonderful ecosystem, interconnected with human activities, and this union is to be celebrated, not prevented.*
>
> (Individual; Correspondence #2826)

Response: Restoration and monitoring efforts are now underway to address declining amphibian populations, and are planned to continue into the future.

Concern 123: The NPS should not increase capacity or development in Yosemite Valley or Wawona because it will negatively impact suitable habitat for migratory bird species.

> *- The NPS memorandum (in response to Executive Order 13186) "requires park units to restore and enhance migratory bird habitat and support conservation of migratory birds"p 9-337. ... Impacts from current and past visitor use and management activities in the Yosemite Valley and the Wawona meadow area have reduced the occurrence of both the Great grey Owl (Strix nebulosa) and the Willow flycatcher (Empidonax tarillii) (p 9-339). To increase day use parking and overnight accommodations, which would result if Alternative 5 is adopted, would do nothing to reduce stressors affecting those species and instead, it would decrease the suitable habitat available to those birds.*
>
> (Individual; Correspondence #2211)

Response: Any increase in development to accommodate visitors would be carefully planned to limit impacts to migratory bird habitat. This planning, coupled with protection and restoration of riparian and meadow habitat, should result in a net benefit to migratory birds. Additionally, bird surveys would be required prior to beginning construction or other site disturbance (see Appendix C, MM-WL-7). No actions in Wawona would adversely affect the Yosemite great gray owl.

Resources—Natural (Wildlife)—Bears

Concern 124: The NPS should not increase user capacity because that would increase negative human-wildlife interactions.

> *Black bear: While the black bear is not limited to riparian or meadow habitat, and it certainly is not considered a riparian species, the fact is that the black bear is highly affected by Park management of vehicles, people, and infrastructure. Current heavy visitor use already results in high amounts of property damage each year and 110 incidents just in 2011 (p 9-346). To INCREASE day use capacity, parking and overnight use would be irresponsible both from a fiscal and environmental perspective (negative wildlife interaction).*
>
> (Individual; Correspondence #2211)

Response: User capacity will remain very close to current levels of use in Yosemite Valley. Any increase in conflicts between humans and bears for any reason would be counteracted by the park's highly successful Human-Bear Management Program. The cornerstone of this program is having field staff contact and educate visitors, and detect and correct food storage problems.

Resources—Natural (Wildlife)—Special Status Species

Concern 125: The NPS should take feasible actions to protect remaining special-status species and ensure the recolonization or reintroduction of those native species to Yosemite Valley and the Merced River Corridor.

> *WHERE DEGRADATION IS FOUND WITHIN THE WILD AND SCENIC RIVER CORRIDOR, THE MANAGING AGENCY SHOULD BE WORKING TO PROTECT OR ENHANCE RESOURCES BY TAKING FEASIBLE ACTIONS TO PROTECT ANY REMAINING INDIVIDUALS OF AT-RISK SPECIES AND BY TAKING FEASIBLE STEPS TO ENSURE THE RECOLONIZATION OR REINTRODUCTION OF THOSE NATIVE SPECIES.*
>
> *- CSERC STRONGLY ASSERTS THAT SIGNIFICANT RESOURCE DEGRADATION HAS OCCURRED IN YOSEMITE VALLEY WITHIN THE RIVER CORRIDOR AND THAT SUCH DEGRADATION IS CONTINUING TO OCCUR. CSERC FURTHER ASSERTS THAT THE DEGRADATION TO WILDLIFE SUSTAINABILITY IS DUE IN PART TO TOO MUCH HUMAN DISTURBANCE, TOO MANY VEHICLES CAUSING MORTALITY ON ROADS, TOO MUCH DIMINISHMENT OF THE NATIVE RIPARIAN VEGETATION (ESPECIALLY WILLOWS) ALONG THE RIVER, AND TOO MANY OTHER HUMAN EFFECTS ON THE NARROW RANGE OF HABITAT NEEDED BY THE AT-RISK SPECIES.*
>
> (Individual; Correspondence #2211)
>
> *The loss of special status plant and wildlife species, specifically the foothill yellow-legged frog, western pond turtle, harlequin duck, willow flycatcher, and in the meadows, the great gray owl, are all degradations that have occurred and continue to occur via the absence of these species (or in the case of the great gray owl, its shift to other less suitable meadow habitats). These degradations should be managed to set a positive trajectory, the reintroduction of these species to their native habitat instead of a vague promise to protect the habitat they no longer utilize.*
>
> (Individual; Correspondence #2211)

Response: As explained in response to Concern 118, monitoring conducted to date of the indicators and standards associated with each ORV, including the Biological ORVs, indicates that degradation is not occurring.

The NPS will continue to take feasible actions to protect special-status species and associated habitat. One of the primary goals of the park's ecological restoration program and the Merced River Plan is to protect and restore riparian and meadow habitats and the special-status species associated with them. This is exemplified by the current intense efforts to restore Sierra Nevada yellow-legged frog population. While this species is not river-dependent, and occurs widely across the park, it has declined by over 95%, sparking a long-term, comprehensive effort to restore habitat and reintroduce the frogs. Protection and restoration of riparian and wetland complexes associated with the Merced River would help protect the special-status species that depend on these habitats.

Resources—Natural (Vegetation)

Concern 126: The NPS should consider preserving the legacy of the apple orchard through cuttings or seed collection.

> *While I'm not sure when the orchard was planted, and I presume it was by the Curry family, it occurs to me that these trees have survived and continue to produce apples (to our dismay and the bears' and deer's delight) for a very long time. Has any effort gone into identifying the variety they are? Are they still available today? Can an effort be made to ensure survival of the genotype for future use? Could cuttings be made, and seeds banked? This is a remarkable set of trees because they survive and produce*

in high altitudes, and could be valuable to a world facing growing hunger and a rise in patented crops. It pains me to see these productive trees in such sad shape from decades of neglect. I would be sorry to see them removed, but they are not native, and do indeed pose an attractive nuisance with regards to bears and deer. Let's ensure that the genotype survives!

(Individual; Correspondence #2464)

Response: The Curry Village Parking Area apple orchard is listed as a character-defining feature of the Yosemite Valley Historic District. These orchards represent this early era of homesteading and settlement in the Sierra Nevada, prior to the establishment of Yosemite National Park. The Curry Village orchard, although in poor physical health, possesses high historic integrity due to the orchard-like setting preserved by the ordered rows of the parking facility. The location of the Curry Orchard in a high visitor-use area presents the increased potential for human-bear interactions; it compounds the problem in such a way that bears are lured close by the orchards and then become attracted to other sources of human food. The Yosemite Orchard Management Guidelines recommend removal and ecological restoration of the Curry Orchard with the following conditions: documentation, possible germplasm conservation, and propagation of rare varieties in a rehabilitated and interpreted Lamon Orchard.

Concern 127: The NPS should consider long-term management issues such as wildlife interactions and maintenance needs prior to planting landscaping plants adjacent to facilities within the park.

When planting trees for screening purposes (e.g., Village Drive behind the Village Store in the concept drawing for alternative 5), keep the long term in mind. Planting numerous incense-cedars in front of the Valley Visitor Center has resulted in many of them being cut down or pruned because they provide too much screening.

(Individual; Correspondence #3402)

When planting native vegetation in and near developed areas, ensure the plants are non-fruiting plants to prevent human-wildlife conflicts.

(Individual; Correspondence #3402)

Response: NPS Project Management staff coordinates closely with park scientists in the Resources Management and Sciences division prior to and during planting of landscape vegetation around facilities. The NPS plants only native vegetation and ensures that invasive weeds don't become establish in disturbed areas, which is important for wildlife habitat. Wildlife corridors within Yosemite Valley largely occur in riparian areas along the banks of the Merced River and its tributaries. Protecting and restoring native vegetation within these corridors and requiring setbacks for new facilities ensures that migration paths for wildlife are retained. Vegetation around buildings is maintained both for wildlife purposes and to ensure that structures are protected from fire.

Concern 128: The NPS should take measures to prevent invasive plant transmission in the Yosemite Wilderness, including improved management of pack stock.

An additional study documents weed invasions in Yosemite (Exotic Species Threat Assessment and Management Prioritization for Sequoia-Kings Canyon and Yosemite National Parks, by J. Gerlach and others, April 2001), and provides clear evidence that domestic stock animals (i.e., horses and mules) are responsible for introducing and spreading weeds in Yosemite. The DEIS fails to honestly evaluate and fully disclose these impacts, and the Plan fails to incorporate mandatory measures that would effectively prevent the introduction and spread of weeds.

(Civic Group; Correspondence #3125)

Response: Please see response to Concern 147.

Resources—Natural (Vegetation)—Blackberries

Concern 129: The NPS should preserve blackberry bushes because they are a historical part of Yosemite Valley and a cultural heritage worthy of preservation.

> *Blackberry bushes. Please leave them alone. I've read that these are being poisoned to kill them off, and are also being ripped out, the logic being that they are non-native... These blackberry bushes are a historical part of the valley, and have just as much right to be preserved as any other non-native species, artifact, and cultural heritage worth preservation.*
>
> (Individual; Correspondence #993)

Response: Blackberry is not identified as a character-defining feature of the Yosemite Valley Historic District. Some of the greatest threats to the natural and cultural resources of Yosemite National Park come from wetland and riparian invasive plants such as Himalayan blackberry (*Rubus discolor*), velvet grass, and reed canary grass (*Phalaris arundinacea*). Himalayan blackberry is a rhizomatous species that is frequently found in riparian corridors and currently occupies about 100 acres within the park. Himalayan and cut-leaved blackberry (*Rubus laciniatus*) are the primary invaders of wetlands in Yosemite Valley.

Resources—Natural (Vegetation)—Special Status Species

Concern 130: The NPS should establish baseline conditions and permanent reference points in order to accurately assess current and future impacts to Sierra Sweet Bay.

> *Sierra Sweet Bay: The DCMP/EIS notes "minor localized trampling associated with recreational River access near the Wawona Campground." DCMP/EIS 5.62. Yet NPS has not yet established permanent reference points, so its goal ? maintenance of "<80% of the reference stands" ? allows further harmful impacts beyond the current conditions. DCMP/EIS 5.62. Because NPS has concluded that the population "is in good condition" (DCMP/EIS 5.64), despite the existing trampling, NPS fails to adequately address measures to eliminate the trampling and fully restore and enhance the River in this segment.*
>
> (Civic Group; Correspondence #2945)

Response: Botanists have completed an overall condition assessment of Sierra sweet bay populations in Yosemite. From this information, botanists will determine the best placement of permanent photopoint monitoring locations and begin long-term monitoring, per the methods described in “River Values and their Management” (Chapter 5).

Resources—Natural (Hydrology and Free Flowing Condition)

Concern 131: The NPS should remove the three bridges that cause the most significant hydrologic impacts to the river in order to enhance its free-flowing condition.

> *The three stone bridges, although quite lovely to look at, should be removed because they cause hydrological problems. Again they health of the River system is of primary importance.*
>
> (Individual; Correspondence #1747)
>
> *[While it may be inarguable that bridges can't be relocated, bridges can feasibly be removed, and the Ahwahnee Bridge and Stoneman Bridge are both clearly identified in the DEIS as causing significant impacts on river hydrology and natural process. It is feasible to remove both bridges that adversely affect river values.] . . . The Ahwanhee and Stoneman Bridges Should Be Removed.... These bridges are not only restricting flow and reducing the health of the floodplain; they are placing visitors in danger of injury or loss of life ... The Stoneman, Sugar Pine, and Ahwahnee Bridges are currently causing hydrologic constrictions that are interfering with the natural hydrologic process of the river. Under*

Alternative 5, the negative impacts caused by leaving the Stoneman and Ahwahnee Bridges would continue. The proposed mitigations (installing large wood debris, brush layering, and engineered log jams) would not completely alleviate the constricting affect of those bridges; only removing the bridges will completely eliminate their negative impact on the Merced River. ... To be consistent with the Secretarial Guidelines, facilities that adversely affect ORV resources in the river corridor must be removed or relocated outside of the river corridor. CSERC asks for the FEIS to fully acknowledge the conflict between retaining the bridges and the Secretarial Guidelines, due to the failure to adequately protect the mid-elevation alluvial segment of this River (ORV-6).

(Individual; Correspondence #2212)

Response: Please see response to Concern 110.

Concern 132: The NPS should not remove the historic bridges because there is no certainty that this action will enhance the free-flowing condition of the river.

However, I am opposed to the removal of the Sugar Pine Bridge. I understand it is to allow the river to flow more naturally. Water is water, it naturally flows around the pillars. I can't see how removing this beautiful historic bridge is seriously useful and to what purpose. The bridge completely fits the ambiance of the park and demolishing it seems like it would cause a lot of damage to the river and it's banks for a long time to come.

(Individual; Correspondence #75)

On the subject of the historic bridges, they should all remain, and not just because they are historic and beautiful to behold, they serve the purpose of keeping the Merced on course. The Merced River meandered and changed its course at least twice before the bridges were built, and will do so again if they are removed, creating more problems for the Park Service. ... we wondered what a flood would do to the Valley if the bridges were not there to slow it down and keep it on course ... And lastly in Chapter 5, page 12 of the EIS it says that the commissioners of 1890 stated that the shifting banks of the Merced River were responsible for much of the destruction of timber and meadowland in the Valley. If the river were returned to its free-flowing condition and allowed to meander and shift its banks, it will destroy the meadows and timber you are trying to save.

(Individual; Correspondence #2325)

The NPS has not adequately studied and documented the purported benefits of removing historic bridges from the Merced River. The Plan fails to prove that any enhancements to free-flow and hydrology supposedly attributable to the destruction of the Sugar Pine Bridge would constitute a net enhancement to river values.

(Civic Group; Correspondence #8328)

Response: Under Alternative 5 (Preferred), all historic bridges including the Sugar Pine Bridge would remain in place for the near term. The park would commission a third party study concerning hydrologic impacts of Sugar Pine Bridge. Along with this information, the park would evaluate the cultural, physical, biological, and economic tradeoffs associated with retention versus removal of the bridge.

Concern 133: The NPS should replace the historic bridges that constrict flows with redesigned bridges that will accommodate peak flows.

People who know rivers can automatically see that these bridges confine and restrict peak flows due to their limited size. If you do not make adequate bridges that work not just for cars, but for the river itself, you will always have problems.

Apparently whoever made your bridges just wanted a pretty thing that passes cars over the water. Bridges need to allow flood capacity to flow under them, otherwise you will get floods again like you have in the past. You can't manage a river that floods without redesigning the bridges, so they work.

(Individual; Correspondence #22)

**Remove the Sugar Pine Bridge and berm connecting it to the Ahwahnee Bridge; reroute the multi-use trail along the north bank of the river. *Retain the Ahwahnee Bridge; mitigate the hydrological effects of the bridge by placing large wood on the riverbanks to address scouring, adding brush layering, and increasing channel complexity between Clarks Bridge and Sentinel Bridge (as described in Chapter 5 and Appendix E). Construct a multi-use trail from the end of the Ahwahnee Bridge to connect to the Lower Pines area.*

I'm not sure why this is necessary. The 'damage' is already done here, why remove the path and relocate it to the north bank? This will impact another area of the river corridor that will likely be reassessed in a few years and determined to be 'damaging' to the Wild and Scenic nature of the river. I say let it alone and save the money, or spend the money on rebuilding the bridges so the supports for the bridge do not enter the river and are set far enough back as to not restrict the free flow of the river. I do agree with mitigating the hydrological effects of the Ahwahnee bridge, so please consider leaving Sugar Pine and implementing similar protection against hydrological effects of that bridge.

(Individual; Correspondence #1756)

Response: Under Alternative 5 (Preferred), all historic bridges including the Sugar Pine Bridge would remain in place for the near term. The park would commission a third party study concerning hydrologic impacts of Sugar Pine Bridge. Along with this information, the park would evaluate the cultural, physical, biological, and economic tradeoffs associated with retention versus removal of the bridge. The retrofitting or replacement of historic bridges with redesigned bridges is not being considered as there are additional studies and mitigation measures proposed in the plan that will address hydrologic impacts and free-flowing condition at various bridge locations.

Concern 134: The NPS should not remove channel hardening infrastructure such as rip rap and revetment to enhance the free-flowing condition of the Merced River because this action will allow potential channel migration and evolution.

Using plants instead of rip rap to stabilize banks is a bad idea. Adding a riparian buffer and putting large wood into the river channel will make the river more dangerous and inaccessible to visitors. What is there works just fine, and because the water quality is good already, these techniques are not necessary and are expensive.

(Individual; Correspondence #2325)

Response: Section 16 of the Wild and Scenic Rivers Act defines free-flowing condition as a river "existing or flowing in natural condition without impoundment, diversion, straightening, rip-rapping or other modification of the waterway." Moreover, one of the five goals of the 1980 Yosemite General Management Plan calls for allowing natural processes to prevail and floodplain management to be in "deference to these natural phenomena". Riparian and aquatic habitat in Yosemite Valley is some of the richest and most important wildlife habitat in the park. Proposed removal of rip rap in Yosemite Valley will improve the free flowing condition of the river, the Biological ORV, and the Geologic/hydrologic ORV.

Concern 135: The NPS should not allow large wood to accumulate in the river because this may pose threats to infrastructure and limit recreation opportunities.

How are placing large wood and log jams in river channels, particularly between Clark's & Sentinel Bridges compatible with letting people use their own rafts along that stretch? Someone will get hurt if current runs them into seasonal detritons.

(Individual; Correspondence #1204)

Since the 1870's large wood, such as downed trees and logjams, were removed from the river to reduce flood risk near bridges and to facilitate road construction and river recreation. If the bridges remain

and you reintroduce big wood back into the river, it could damage the bridges and roads, and restrict recreation.

(Individual; Correspondence #2325)

Response: Large wood is a critical component of river systems (Gregory et al 2003). Wood in general provides nutrients for aquatic organisms; large wood provides cover and shade for fish, causes local scour in the streambed to form pools, protect banks from erosion, and protect the banks from trampling (Madej, 1994). Allowing wood to accumulate in the river is consistent with the Yosemite General Management Plan goal of allowing natural processes to prevail, and the requirement of the Wild and Scenic Rivers Act to protect and enhance the biological and geologic/hydrologic outstandingly remarkable values in Yosemite Valley. The latter require a robust flood regime that is associated with large wood accumulation. River recreation, like every recreational activity in Yosemite, contains inherent risk. Section 8.2.5.1 of NPS Management Policies (2006) states "Park visitors must assume a substantial degree of risk and responsibility for their own safety when visiting areas that are managed and maintained as natural, cultural, or recreational environments". The management of large wood in the Merced River is outlined in Yosemite Directive #31.

Concern 136: The NPS should not replace one method of bank stabilization (e.g., rip-rap) with another method (e.g., log jams, willow planting, bioengineering techniques) because it will not enhance river free flow.

Suggest you do not replace one method of bank stabilization with another. The draft proposes to build artificial log jams and use bioengineering techniques, like willow planting, where riverbank stabilization is needed to protect infrastructure. This is good, but one method of stabilization (riprap) is just being replaced with other methods, which doesn't make sense if the goal is to enhance river free flow.

(Individual; Correspondence #2273)

Nature repeatedly demonstrates its control over hydrology and other natural conditions in the Valley. The plan makes presumptive comments about the restorative effects of expensive investments in restoration that can be annihilated in hours or day when flood events occur. There should be a higher priority attached to the LEAST expensive measures which have the GREATEST likelihood of enduring natural processes, even when violent. Comments in the plan about eroded banks are a case in point. Erosion is a natural process, which in the long term will, in fact, remove the Sierra peaks and fill in its valleys. We should not attempt to war with nature in the erosion process. Nature will win.

(Individual; Correspondence #2839)

Response: Rip-rap revetment constructed from rock is less desirable than bioengineering approaches from both ecological and hydrological perspectives. Bioengineering approaches slow flow velocity in a manner similar to natural riparian vegetation by promoting sediment deposition and riparian plant growth which render riverbanks more resilient to floods than rock rip-rap. Removing rip rap that is no longer functional and replacing rip rap with bioengineering protects and enhances the free flowing condition of the river, as defined in Section 16(b) of the Wild and Scenic Rivers Act.

Concern 137: The NPS should maintain and create cut off channels or culverts to prevent channel migration and subsequent damage to infrastructure.

Sugar Pine Bridge removal – The justification to remove this historic bridge is to enhance the free flowing condition of the river. Although I support enhancing the free flowing condition of the river I feel every effort should be made to protect this bridge, a historic resource. Instead of removing the historic bridge I propose the construction of a bypass channel around the bridge. The former road (now a bike path) between the Ahwahnee and Sugar Pine bridges is built on a long dike. This dike could be breached at the western approach to the Sugar Pine Bridge to allow the river to continue flowing around the

downstream oxbow during high water conditions. The breached area could be bridged to allow the bike path to remain where it is.

(Individual; Correspondence #1690)

I'm suggesting that the existing cutoff channel be cleaned out and possibly enlarged, and additionally (and this is quite problematic) an additional cutoff channel or underground tunnel or culvert be created north of the Upper and Lower River campgrounds. In effect, this would straighten out the river in the case of 50-100-year floods similar to the January 1997 event. Perhaps 20-30 year floods wouldn't even need the additional water carrying capacity. I know this is heresy with regard to keeping the valley floor "natural", but it's been a long time since it's been totally naturally, and if camping is to be maintained on the valley floor and damage to facilities avoided, some heroic efforts are going to have to be taken. Perhaps shallow but broad cutoff channels located in strategic areas can mitigate the damage done in 30-50 year floods. Maybe nothing can be done to mitigate the effects of the 100-year floods, and the only solution is just to fix the damage. The river is trying to meander. It needs to be restrained as much as possible in the vicinity of the campgrounds.

(Individual; Correspondence #1697)

Response: Manipulations that affect the free flowing condition of the river is contrary to both the spirit and the letter of the Wild and Scenic Rivers Act. Maintaining the free flowing condition of the river, as required by WSRA, may result in natural channel migration and avulsion. Proposed actions to remove facilities within the proposed riparian buffer would help to reduce damage from future flooding.

Concern 138: The NPS should strengthen the management standards for free-flowing condition in the plan, as the current standard does not provide enough accountability.

Suggest you strengthen the management standard for free-flowing condition. "Preservation of the river in its current state" is too weak. This standard requires you to do nothing, even though the river has been so altered by human activity. But then the draft describes several actions you will do to enhance free flow: river bank revegetation, removal of bridges and abandoned infrastructure like sewer lines, and removal of riprap ... and you commit to not develop anything new within the bed and banks of the river, but you are not holding yourselves to any standard beyond the status quo. This assumes the river's free-flowing condition is not already degraded, which is not true. Why not develop a standard that encourages, measures, and monitors improvement of the river's free-flowing condition?

(Individual; Correspondence #2273)

Response: Protection of free-flowing condition is mandated by section 7 of the Wild and Scenic Rivers Act. The Act also prescribes a process whereby new developments within the bed and banks of the river are to be examined before potentially being allowed, so a different standard is unnecessary. The Merced River's free-flowing nature, by virtue of Wild and Scenic designation, receives the highest level of protection, as specified in the Act's section 7 stipulation. To further enhance this river value, the plan proposes a number of actions to improve the free-flowing condition of the Merced River in Yosemite Valley, including the establishment of a riparian buffer and removal of over 6,000 linear feet of rip-rap.

Concern 139: The NPS should examine the feasibility of rebuilding the historic bridges instead of removing them

If the NPS is serious about restoring free flow, you should remove all riprap and all bridges, not just Sugar Pine Bridge. ... Instead of removing all the bridges, which will never be politically or culturally acceptable, I suggest you determine the feasibility of rebuilding the bridges instead.

(Individual; Correspondence #2273)

Response: Please see response to Concern 133.

Concern 140: The NPS should remove a consistent number of linear feet of riprap across all the alternatives.

> *... the amount of riprap to be removed varies by alternative, which makes no sense-if it needs to be removed for the sake of a free flowing river, it needs to be removed ...*
>
> (Individual; Correspondence #2273)

Response: Common to Alternatives 2–6 is the removal of 5,700 feet of rip-rap. Additional rip-rap associated with Sugar Pine, Ahwahnee, and Stoneman bridges would be removed if the corresponding bridge were removed. Because the bridge-related actions vary by alternative, the amount of rip-rap removed also varies.

Concern 141: The NPS should remove the Stoneman and Ahwahnee Bridges because they are negatively impacting the free-flowing condition of the Merced River.

> *The proposed mitigations (installing large wood debris, brush layering, and engineered log jams) would not completely alleviate the constricting affect of those bridges; only removing the bridges will completely eliminate their negative impact on the Merced River. ... ? As shown in the quoted sections of the DEIS, the presence of the Stoneman and Ahwahnee Bridges are negatively impacting the free-flowing condition of the Merced River and the associated negative impacts cannot be fully mitigated unless these bridges are removed.*
>
> (Individual; Correspondence #2212)
>
> *At present, the Merced River in Yosemite Valley is far from free-flowing. ... Because of human actions, including application of riprap to stabilize river banks, one channel now largely confines the river, except during floods. ... If the NPS is serious about restoring free flow, you should remove all riprap and all bridges, not just Sugar Pine Bridge. Removing one bridge will not restore the river or surrounding area; it will have a localized effect, and will destroy a valuable piece of history.*
>
> (Individual; Correspondence #2273)

Response: Please see response to Concern 100.

Resources—Natural (Meadow and Riparian Complexes)

Concern 142: The NPS should not create additional campgrounds because that would prevent natural ecosystems from recovering.

> *As for campers, I can't imagine taking showers away from people who are at Housekeeping camp or campgrounds. Adding additional campgrounds may take away from natural areas and prevent ecosystems from continuing to survive.*
>
> (Individual; Correspondence #2605)

Response: The NPS has withdrawn the campground at Eagle Creek that was initially proposed in the DEIS under Alternative 5(Preferred). All other proposed campgrounds or proposed camp site expansions have been carefully considered during the planning process. All proposed campgrounds and camp site expansions are situated on sites adjacent to other campgrounds or that have been previously disturbed. Careful site design of proposed campgrounds will ensure that all ORVs, including natural resource ORVs, remain protected.

Concern 143: The NPS should not introduce fencing to the meadows, as it would detract from the Yosemite experience.

> *It would be very disappointing to have fencing around the meadows. It would detract from the whole Yosemite experience.*
>
> (Individual; Correspondence #2526)

Response: A variety of options are being considered to best protect Yosemite Valley's meadows from the impacts associated with trampling via foot traffic. Preserving visitor experience and access to the meadows is a fundamental component of this restoration planning. At times, fencing and signs may be required to protect the most sensitive meadow areas. For example, the plan addresses impacted areas in El Capitan meadow and access issues through a combination of roadside curbing, limited split rail fencing and boardwalks. The overall design will still accommodate visitors in the meadow while greatly reducing trampling impacts to the most sensitive and highly used areas of the meadow. Visitors will be directed to less sensitive areas of the meadow and boardwalks and viewing platforms. These strategies will concentrate use in areas that reduce meadow impacts, limit introduction of non-native species and greatly reduce habitat fragmentation.

Concern 144: The NPS should take additional proactive management actions to correct existing impacts to meadow and riparian areas.

> *... the narrative suggests that an adverse affect won't be considered until twice the bare soil that occurs in areas of low ecological condition are found (page 5-31). Please explain how this and triggering mechanisms will lead to change? Simply put, the status quo is the default position in the preferred alternative even though problems are documented.*
>
> (Individual; Correspondence #2730)
>
> *Rare, Mid-elevation Alluvial River: Degradation is present as "about 20% of the riparian area along the Merced River in Yosemite Valley" is in "low condition." DCMP/EIS 5-67. Several management actions are listed, demonstrating the inadequacy of the status quo baseline. Id. NPS acknowledges that remedies for these conditions are necessary, but identifies none. DCMP/EIS 5.68. Again, NPS fails to repair, restore and enhance the River's ORVs*
>
> (Civic Group; Correspondence #2945)
>
> *High-elevation Meadows and Riparian Habitat: Adverse conditions include "braided and rutted formal trails," "very low vegetation cover and high bare-ground levels associated with several years of pack stock grazing," and "extensive informal trails." DCMP/EIS 5-28. Yet NPS has established no current baseline from which it can evaluate these impacts. DCMP/EIS 5-41. Mid-elevation Meadows and Riparian Habitat: Many meadow- and riparian- related issues remain, yet NPS only promises to monitor conditions. DCMP/EIS 5.42-5.61. NPS further lists management actions necessary under Alternatives 2-6, yet proposes no measures to repair, restore and enhance the already-impacted baseline conditions. DCMP/EIS 5.61.*
>
> (Civic Group; Correspondence #2945)

Response: The NPS is taking multiple measures to ensure protection of meadows and riparian areas. The methods referred to in this comment are monitoring tools that the park will use to track meadow and riparian condition. In the Yosemite Valley river segment, three indicators are used to concurrently monitor the status and trend of meadow and riparian habitats including the Fragmentation Indicator, the Riparian Habitat Indicator and the Riparian Bird Indicator. Additional studies and projects are ongoing but not specifically part of the monitoring protocols. For example, Yosemite National Park is currently monitoring riverbank condition at 48 permanent plots to determine if vegetation condition trends suggest further loss of soils and bank stability. In addition to the monitoring program, Appendix E outlines management actions that will restore many acres of meadow and riparian habitat as part of the Merced River Plan. The restoration efforts include meadow and riverbank restoration as well as installation of constructed logjams to improve the hydrologic regime of the Merced River through Yosemite Valley.

Concern 145: The NPS should educate all backcountry users about sensitive riparian areas and regulate boaters using the established overnight wilderness zone capacities managed by the wilderness permit system.

> *The Draft Plan's Preferred Alternative proposes a limit of 10 boats per day on the Merced River above Nevada Fall, stating that this limit is necessary to protect riparian habitat from trampling and bank erosion that could result from unlimited access. (Biological ORV-1). This is due to the fact that that put-in and take-out locations would be undesignated. Additionally, the Draft Plan explains that the limit would not substantively change the wilderness character or experience (Recreational ORV-19).*
>
> *Day and overnight hikers are also likely to trample bank vegetation in an effort to enjoy being close to the river, however there is no proposal to limit their ability to access the bank. We suggest that all backcountry users be educated at the time they receive their permit about sensitive riparian areas and ways to protect the resource. Boaters should be subject to the limitation on overnight group size (eight people per night if they are off trail, and 15 people per night if they are on) and boating use should remain within established overnight wilderness zone capacities, as managed by a backcountry permit system.*
>
> (Individual; Correspondence #2611)

Response: Boating in backcountry areas will be limited by capacities consistent with overnight wilderness zone quotas established for Alternatives 2-6. Alternative 5 (Preferred) in the FEIS proposes to manage boating permits through the existing wilderness permit system (Appendix R: Boating Opportunities provides more information). Issuing permits insures visitor contact and is a good opportunity to provide information about minimizing user impacts in sensitive riparian areas.

Concern 146: The NPS should conduct additional studies and gather scientific data on meadow conditions to better guide the management of pack stock grazing.

> *Before addressing the methodological adequacy of the bare soil method, it is instructive to look at research dealing directly with pack stock grazing as opposed to traditional livestock grazing. Indeed, the DEIS is not explicit whether the research done on the national forests in California and referenced extensively in the DEIS was done on livestock like cattle and sheep or pack stock. ... Grazing management research in wildland areas needs to address how these areas respond to use, and which community responses can be used to indicate acceptable or unacceptable change. Our objective was to determine the level of packstock grazing that a dry subalpine meadow can tolerate without changing ground cover, soil compaction, and plant growth. Such information will help land managers develop guidelines for packstock grazing. (see Olson-Rutz, et al., undated, Packstock grazing impacts on soil compaction, plant growth, and ground cover of a high altitude meadow, online at http://www.animalrangeextension.montana.edu/Articles/Equine/Packstock.htm). ...*
>
> *This study and a related report (Olson-Rutz, et al., undated, Final Report: The effects of packstock grazing on a dry, high elevation meadow, online at http://animalrangeextension.montana.edu/Articles/Equine/Final/Finalreport.htm)*
>
> *What constitutes moderate use in Montana's Lee Metcalf Wilderness would almost certainly be light use in a heavily used wilderness like Yosemite National Park.*
>
> (Individual; Correspondence #2730)

Response: The park will use recent, current and future work related to pack stock and metrics of meadow condition from Yosemite and the Sierra Nevada to inform pack stock management. Some examples of past studies include Cole et al. (2004), Holmquist et al. (2010, 2013), and Olson-Rutz et al. (1996). The NPS, USGS, and academic researchers are engaged in current stock use studies in Yosemite and results of those studies will also inform management practices as results become available.

The park also draws on literature from field studies from wild herbivores or livestock that have implications for large herbivore grazing in general (e.g., Fahnestock and Detling 2000, Pietola et al. 2005), or experimental clipping manipulations that simulate grazing (e.g., Miller and Donart 1981) to understand effects of grazing.

Concern 147: The NPS should include a complete discussion of weed management in the context of a weed prevention program in the EIS.

> *The DEIS has little on weeds in meadows. What measures for preventing weed transmission by pack stock will be taken to prevent their establishment in the wilderness? The DEIS discusses some measures, but they are not discussed in context of a weed prevention program. A complete program would consider the following:*
>
> *Require pelletized feed. There is a great deal of doubt that all certified hay is in fact weed free. Pellets are a simple and proven-effective remedy.*
>
> *Prohibit stock grazing and/or use in areas that currently contain weeds until the weeds are eliminated. Stock grazing on weeds along trails or in meadows carry and deposit those weed seeds into other parts of the Wilderness. Even if stock are free of weeds when entering the Wilderness, they can still spread weeds if allowed to graze in areas that contain weeds.*
>
> *Require that all assigned camp sites (outfitters) and administrative sites will be made weed free within 5 years, or those sites will be closed to public, commercial, and administrative use until they are certified as weed free. Failure to keep a weed-free site would result in an automatic permit revocation or airstrip closure.*
>
> *Implement Wilderness-wide campsite standards that will eliminate bare ground that serves as a ready site for weed invasion.*
>
> *Adopt policies that recognize that trail systems are weed vectors and act accordingly. Viewing wilderness through the lens of recreation-which includes attendant infrastructure -rather than emphasizing wilderness character, as the Wilderness Act requires, would be a huge step in preventing further weed spread.*
>
> *Quarantine all animals for at least 48 hours prior to entering the wilderness. The quarantine facilities, as well as commercial stock-holding facilities, should be outside of the Yosemite National Park boundary.*
>
> *Require an inspection of camping gear before entering the wilderness including boots, boats (canoes, kayaks, float tubes, etc.), and packs.*
>
> (Individual; Correspondence #2730)

Response: The NPS recognizes that weeds are one of the greatest threats to the ecological integrity of the park. Weeds in meadows are of particular concern, though the current threat of weeds lessens as elevation increases. For example, non-native plants were found in over 80% of meadow study plots in Yosemite Valley in 2010 (Ballenger 2011). Non-native plants at high elevations were absent from the over 2,000 plots studied the same period, though they were present at high elevations in close proximity to developed areas. Because there are a number of non-native plants that could invade high elevation meadows, action should be taken to prevent introduction of non-native plants in wilderness. The NPS will develop a comprehensive weed-free plan for stock use in wilderness, per the 2010 Invasive Plant Management Update. In the meantime, the NPS uses the following best management practices as part of everyday operations in Wilderness: (1) park staff and volunteers ensure that all clothing, gear, helicopters, and items entering the wilderness are weed-free, (2) park staff conduct surveys and eradicate invasive plant populations in wilderness, (3) park staff regularly inspect trailheads and other wilderness staging areas and remove non-native plants, (4) park staff coordinate invasive plant prevention and early detection with adjacent land management agency staff.

Concern 148: The NPS should remove Northside Drive through Ahwahnee Meadow and Stoneman Bridge because they impact Biological ORVs and the free-flowing condition of the Merced River.

> *There would be ecological benefit if Northside Drive was removed from Ahwahnee Meadow (and Stoneman Bridge should be removed). The impacts on the free-flowing condition of the river from Stoneman Bridge are unacceptable given the direction of the WSRA and because there is no assured mitigation for the Bridge disrupting the natural hydrology of the river. - CSERC disagrees with the Park's analysis in the DEIS that the Stoneman Bridge and associated road are not creating an adverse effect on Outstandingly Remarkable Values by degrading meadow and riparian habitat. We believe that the FEIS should show that there are significant resource impacts from the road and bridge, and that removal of both would benefit the river corridor ecosystem.*
>
> (Individual; Correspondence #2210)
>
> *CSERC disagrees with the Park's analysis in the DEIS that the Stoneman Bridge and associated road are not creating an adverse effect on Outstandingly Remarkable Values by degrading meadow and riparian habitat.*
>
> (Individual; Correspondence #2210)

Response: The NPS revised the analysis in the Final EIS to clarify the impacts from the continued presence of Stoneman Bridge and Northside Drive through the Ahwahnee Meadow. The EIS also acknowledges the loss of adjacent habitat from the new campground construction. Ecological benefits in the Ahwahnee Meadow/Stoneman Bridge area under Alternative 5 (Preferred) include extensive meadow and riparian restoration and establishment of a protective riparian buffer along the river.

Under Alternatives 2–6, the NPS determined whether adverse impacts are present on ORV 2 (mid-elevation meadows and riparian communities in Yosemite Valley), by assessing meadow fragmentation that results from proliferation of informal trails, the status of riparian habitat, and riparian bird abundance. Each of these indicators is associated with metrics that determine whether an adverse effect is present, as described in "River Values and their Management" (Chapter 5). The NPS determined that an adverse effect is not currently present on ORV 2. To ensure that this ORV is protected and enhanced in the future, the indicators will be regularly monitored, and specific management actions would take place should triggers be reached, as described in Chapter 5.

Concern 149: The NPS should use a different monitoring protocol than the bare-soil method for evaluating high elevation meadow conditions.

> *The protocol for managing meadow grazing use (bare soil, page 5-29) is not the best method. The DEIS notes that plant utilization is better, but concludes such measures are too difficult. However, those are precisely the measures used in traditional livestock management. Just because the NPS does not currently have expertise in range ecology is no reason to exclude these measures. If the NPS had done what it should have done and gathered range condition and trend data, it would have a better idea of how to proceed.*
>
> (Individual; Correspondence #2730)

Response: Resource managers have worked with academic collaborators and a team of subject matter experts to identify bare meadow soil as the best tool for long term monitoring of meadow impacts. Additionally, a secondary assessment tool is currently in development in order to ensure that meadow conditions are sufficiently evaluated with a higher resolution if impacts are evident.

Concern 150: The NPS should present information on the current utilization and baseline conditions of meadows in the wilderness segments, and determine the amount of stock that can be accommodated in these segments without adverse impact to river values.

> *What is the carrying capacity of the wilderness sections of the wild rivers in terms of number of stock? In any case, does maximum carrying capacity, which is generally a process to determine livestock grazing capacity on lands under multiple-use mandates, even apply to a National Park? In other words, shouldn't the National Park Service first determine what condition the meadows should be in, after public involvement, and then determine what kind of pack stock use, if any, might be compatible, in the meadows? Unfortunately, just as the multiple-use agencies default to the status quo, which is almost always an over allocation, the NPS here defaults to current use patterns without exploring a range of alternatives, as required by NEPA.*
>
> (Individual; Correspondence # 2730)

Response: The NPS is currently working on research and monitoring aimed at establishing meadow opening dates and grazing capacities for specific wilderness meadows. A meadow condition assessment was performed in 2010 at all meadows within the river corridor. This report addresses the current conditions of meadows as well as the condition at the time of designation. This report can be found at http://www.nps.gov/yose/parkmgmt/upload/MRP-Meadows_Report_20120424.pdf. In addition the park is currently implementing the bare meadow soil indicator as part of the monitoring program associated with the MRP. This measure will ensure appropriate protection for all meadows with a potential for livestock grazing and establish triggers and management standards as well as associated management actions to protect the ORV and to prevent the meadow quality from being adversely affected.

Resources—Natural (Water Quality and Water Supply)

Concern 151: The NPS should retain existing commercial services and facilities unless current water quality monitoring indicates effects from stock use.

> *I would be agreeable to removal of stables rides, all pools and the historic ice skating activities if there was truly clear indication that chemicals, etc. were leaching into ground water which would negative impact to the river. Though I would expect with no pools, more people will swim in and pollute the river.*
>
> (Individual; Correspondence #1283)
>
> *The NPS states in the River Value Condition, Protection and Enhancement portion of the DEIS under Current Condition page 5-23, "Current water quality in all Merced River segments is high, with most water quality sampling results near natural background levels." In Table 5-3 Management Actions and Trigger Points to Maintain Desired Conditions for Water Quality one of the trigger point's states: "If impacts result from stock use, redirect/reduce/limit stock use in certain areas." Due to the fact that the water quality currently does not indicate any effects from stock use BCHC does not see the immediate need for elimination of the stables or commercial horseback rides. With good scientific monitoring into the future, a trigger point can be used to address any degradation of water quality.*
>
> (Individual; Correspondence #1983)

Response: The water quality of the Merced River is exceptional, and far above state water quality standards. There are no water quality concerns that would necessitate a ban on stock use or removal of facilities from the river corridor. The decision to limit or remove commercial horseback rides in Alternative 5 (Preferred) is because of crowding and conflicts between hikers and stock on busy trail segments. However, private stock use is still allowed in all river segments. Through the plan, the NPS has modified the conditions under which stock use occurs and the areas where it occurs to address management considerations and the user capacity requirements of the WSRA.

Concern 152: The NPS should limit the facilities in and number of visitors to the park in order to conserve limited water resources.

> *Yosemite and the communities around it, do not have the resource to meet the demands of an increase in tourists/visitors. We live in Oakhurst and watch trees dying around us due to a lack of water due to the drought. Now is the time to conserve our resources, not expand them*
>
> (Individual; Correspondence #2141)
>
> *To protect and preserve the River and its ORVs as required by the WSRA, NPS must limit potentially harmful development of lands and facilities within the River corridor. Unchecked development within the corridor can only lead to impermissible degradation of the River and its ORVs. To protect these ORVs, the DCMP/EIS must consider regulating development over which NPS has permit authority. This includes planned development in Wawona10 and surrounding areas on private property where infrastructure such as housing and power-lines has been built or is proposed for expansion.11 ... NPS should limit "developed" land use zones (zones allowing intensive visitor use and/or developed facilities) in order to insure that Yosemite is not overburdened with facilities such as hotels, cabins, and restaurants that attract an excessive number of visitors and consume an unsustainable quantum of the Park's scarce natural resources such as ground-water. ... Specifically, projects such as the Yosemite Lodge Development,13 the Yosemite Village Parking and Transit Area Improvements,14 Curry Village Cabins,15 and Camp Wawona16 are likely inconsistent with WSRA's goals for protecting the River corridor. NPS must design land management zoning to mitigate, curtail or reject altogether projects that increase resource consumption or induce excessive visitor usage, and thereby harm ORVs.*
>
> (Civic Group; Correspondence #2945)

Response: The NPS conducted several scientific studies regarding available water for development. In Wawona, Holmquist and Waddle (2012) determined that a water conservation plan established in the early 1990's protected aquatic habitats in the South Fork Merced River. In Yosemite Valley, Newcomb and Fogg (2012) determined that "groundwater pumping likely would not produce significant short-term impacts on streamflow and the water table". These studies also provide important baseline condition information that may be re-examined in the future as conditions change. In the meantime, the NPS is committed to the sustainable use of resources when upgrading and building new facilities, which includes installation of low flow toilets and fixtures and drought-tolerant native landscaping. Additionally, the NPS will install bioswales in new parking areas in the Merced River Corridor, which will filter runoff and percolate water back into the aquifer.

Concern 153: The NPS should use appropriate surfacing materials in parking lots to reduce the potential of water quality impacts.

> *With regard to Camp 6, I would encourage NPS to take the plan one step further than previously discussed. Unless the plan is to place an impermeable membrane between the gravel parking surface and native ground, expect oils and other automotive fluids that come off cars in the parking lot to ultimately find their way to the river. While not the most aesthetically pleasing, asphalt concrete will hold up longer, and if properly maintained, will help keep automotive fluids out of the river, especially if drop inlets and water filters are included in the project.*
>
> (Individual; Correspondence #2602)

Response: To address water quality concerns, The NPS will consider both the use of asphalt and the installation of alternative surfacing methods in all parking areas (epoxy resin binders, soil cell dividers, or surfactants). Additionally, the NPS plans on installing bioswales in parking lots to filter runoff and pollutants. The final parking area design is subject to review and approval by the California State Regional Water Quality Control Board.

Concern 154: The NPS should limit stock use in the park in order to reduce impacts to water quality.

> *Because stock animals are known to contaminate surface waters with disease-causing pathogens (and because of the many other stock-related impacts ...), the use of stock animals should be prohibited within the Merced River corridor, except in cases where they are absolutely necessary.*
>
> (Civic Group; Correspondence #3125)
>
> *It's critical that impacts to Yosemite's aquatic ecosystem be controlled or mitigated by reducing concentrations of people in fragile areas. Reductions of clearly environmentally harmful activities -- especially horses -- must be stopped.*
>
> (Individual; Correspondence #3507)

Response: Please see the response to Concern 151.

Concern 155: The NPS should not retain the High Sierra Camps because both human and stock use related to the camps contributes to water pollution.

> *High Sierra is concerned about the commercial "High Sierra Camps" (HSCs) at Vogelsang, May Lake, Sunrise, and Merced Lake, all of which drain to the Merced River. ... numerous significant pollutants of human occupancy are produced at the camps, including sewage (human body wastes), "gray water" from showers, grease and detergent from kitchens, and other garbage and trash. Wastewater, sewage, and other wastes from these developments pollute the meadows, soils, and waters of Yosemite. Further, the numerous "packtrains" needed to supply the camps significantly damage and pollute trails and surrounding areas, including the Merced River. ... scientists from the University of California (U.C. Davis Medical School) have documented that Yosemite's waters are significantly polluted, and concluded that: "pack animals are most likely the source of coliform [bacterial] pollution" (Derlet and Carlson 2006).*
>
> (Civic Group; Correspondence #3125)

Response: Please see the response to Concern 151.

Concern 156: The NPS should more rigorously analyze two scientific papers documenting water-quality issues and environmental impacts from stock use in the Wilderness.

> *Although these two scientific papers (i.e., Derlet and Carlson 2006; Derlet and others 2008) are listed in the DEIS's bibliography, the DEIS fails to honestly analyze or disclose the papers' findings or to acknowledge the conclusion the Yosemite's waters are being significantly polluted by domestic stock animals. Simply listing papers in the bibliography does not constitute the analysis and disclosure of the significant environmental impacts documented therein.*
>
> (Civic Group; Correspondence #3125)

Response: Yosemite National Park staff have evaluated results from Derlet and Carlson (2006) and Derlet and others (2008) and have found the results suggestive, though not sufficiently rigorous to inform management decisions. The authors use non-standard bacterial analyses, fail to attribute sources of bacteria by their own admission, and do not provide evidence that measured values represent impacts to human health or the environment. Recent work by Roche and others (2013) has shown that areas used by cattle in U.S. Forest Service grazing allotments exhibit bacteria levels that are well below published environmental and human health criteria. This study used standard EPA analyses and compared the results to published standards, which is the level of rigor required to make land management decisions.

Resources—Natural (Air Quality)

Concern 157: The NPS should restrict or eliminate campfires in Yosemite Valley to improve air quality.

Do something about the smoke from fires at the campsites, perhaps limit fires from 5 PM to 8PM and 6AM to 8 AM. The smoke from the fires in the valley is the worst part of a trip into the valley.

(Individual; Correspondence #1147)

Prohibit all campfires in Yosemite Valley.

(Individual; Correspondence #1395)

I noticed on a recent visit that campfires are now prohibited at certain times of day. While this is a step in the right direction, it is not enough. The valley is still often smoky. One of the reasons I go to the mountains is to breath clean air and enjoy the views. Campfires are not compatible with clean air and good views. This change also has the advantage of costing nothing and being quick and easy to implement. Please eliminate campfires completely!

One thing that I wish for in Yosemite Valley is the reduction in campfires. When all the campsites have fires, it is almost impossible to breathe. We have had to cut a trip short because of this issue. However, I know this would be pretty controversial. Maybe there could be more communal campfire areas that use wood so that people can share that experience together.

(Individual; Correspondence #1581)

- Campfire smoke at Valley campgrounds: There is no justification for every campsite to have a roaring campfire at nig

(Individual; Correspondence #2212)

Campfires should be banned; if you cannot ban them all together then there should be only one fire per campground at the campground main fire ring that is started by a Ra

(Individual; Correspondence #3251)

Specifically I have concerns about: ... Air quality impacts from existing and now proposed 37% increase in camping areas. I have found that smoke in Yosemite Valley detracts from my enjoyment of the park especially in the evening and morning hours. Visiting a National Park should not be unhealthful, due to smoke in the air. ... Does the DEIS document the current particulate and other hydrocarbon pollution levels and amount of deposition that gets into the Merced River runoff? Does the DEIS map out the major sources of wood smoke pollution in Yosemite Valley? ... Are the levels of campground smoke pollution exceeding health standards in any areas of Yosemite today for peak 1 hour or 8 hour periods? We are told during forest fires that if you smell smoke, you should stay indoors and not excercise vigorously outdoors. Well, clearly I have experienced rahter smokey conditions in Yosemite, especially near and downwind of campgrounds. ... Does the DEIS calculate the expected increase in wood fire smoke that will be produced by the expansion of campgrounds?

(Individual; Correspondence #3513)

Response: The NPS acknowledges that campfires are an existing local source of air pollution in Yosemite Valley and this is described in the Air Quality analysis in "Affected Environment and Environmental Consequences" (Chapter 9). However, whether or not to eliminate or limit campfires in Yosemite campgrounds is a parkwide management issue that is not addressed in this plan. The NPS could restrict the use of campfires in the future through the Superintendent's Compendium, independent of the Merced River Plan.

Concern 158: The NPS should incorporate additional mitigation measures for air quality impacts resulting from construction.

If practicable, lease new, clean equipment meeting the most stringent of applicable Federal or State Standards. In general, only Tier 3 or newer engines should be employed in the construction phase.

(Individual; Correspondence #1899)

Identify all commitments to reduce construction emissions and incorporate these reductions into the air quality analysis to reflect additional air quality improvements that would result from adopting specific air quality measures.

(Individual; Correspondence #1899)

Prepare an inventory of all equipment prior to construction, and identify the suitability of add-on emission controls for each piee of equipment before groundbreaking. (Suitability of control devices is based on: whether there is reduced normal availablity of the construction equipment due to increased downtime and/or power output, whether there may be significant damage caused to the construction equipment engine, or whether there may be a significant risk to nearby workers or the public.) Meet CARB diesel fuel requirement for off-road and on-highway (i.e., 15ppm), and where appropriate use alternative fuels such as natural gas and electric.

(Individual; Correspondence #1899)

Utilize EPA-registered particulate traps and other appropriate controls where suitable, to reduce emissions of diesel particulate matter and other pollutants at the const

(Individual; Correspondence #1899)

Response: The NPS and its contractors will comply with EPA and California Air Resources Board (CARB) regulations regarding the operation of vehicles and equipment during construction. All construction vehicles are required to be equipped with Best Available Control Technology and must meet CARB'S most recent standards to reduce emissions. This is included in MM-AIR-2 Appendix C, "Mitigation Measures Applicable to All Action Alternatives".

Concern 159: The NPS should expand "On-road Vehicle Criteria Pollutant and GHG Emission Estimates" (Appendix G) and "Affected Environment and Environmental Consequences" (Chapter 9) to include timber harvest and pre-treatment equipment emissions and mitigation measures.

Chapter 9 and Appendix G of the document should be expanded to include timber harvest and pre-treatment equipment emissions and mitigation measures such as:

- *Mobile and Stationary Source Controls:*
- *Reduce use, trips, and unnecessary idling from heavy equipment.*
- *Maintain and tune engines per manufacturer's specifications to perform at California Air Resources Board (CARB) and/or EPA certification, where applicable, levels and to perform at verified standards applicable to retrofit technologies. Employ periodic, unscheduled inspections to limit unnecessary idling and to ensure that construction equipment is properly maintained, tuned, and modified consistent with established specifications. CARB has a number of mobile source anti-idling requirements. See their website at: http://www.arb.ca.gov/msprog/truck-idling/truck-idling.htm*
- *Prohibit any tampering with engines and require continuing adherence to manufacturer's recommendations*

(Individual; Correspondence #1899)

Response: On-road vehicles are the primary source of emissions, which were included in the emissions analyses for each alternative. The DEIS used best available information, and estimates of timber harvest and pre-treatment equipment is not readily availed for modeling purposes. However, several mitigation

measures suggested by EPA pertaining to operational maintenance equipment were added to Appendix C, "Mitigation Measures Applicable to All Action Alternatives".

Concern 160: The NPS should quantitatively evaluate air pollutant general conformity.

> *All direct and indirect emissions from both the construction and operational phases of the project should be quantitatively evaluated and compared to de minimis levels for general conformity purposes.*
>
> (Individual; Correspondence #1899)

Response: Quantitative General Conformity analysis for Alternative 5 (Preferred) is included in Appendix Q.

Concern 161: The NPS should further analyze and address air quality impacts resulting from different vehicle types and visitor use patterns, as well as migrant air pollution from remote emission sources.

> *Pages 9-704 and following. It should have been noted in the MRP/DEIS that vehicle emission systems work at peak efficiency once the vehicle engine has achieved normal operating temperature. Day visitor vehicles are operating at peak efficiency when they enter the Park, and since they are in the Valley primarily during the mid-day hours their vehicles remain close to peak efficiency even after having been parked a few hours. Overnight guests, on the other hand, often arrive late in the day when inversions can start to build, and often start their vehicles in early morning hours when air inversions are most common and emission control system least effective. Why is this not addressed in the MRP/DEIS? Engine type (fuel source) is also an issue and smaller vehicles are generally more likely to have the latest emission control technology than larger vehicles, such as transit buses, will. Why is this not addressed? Migrant air pollution is a major contributor to air quality degradation in Yosemite National Park. It should be noted in the MRP/DEIS that vehicles staged at gateway bus stops will cool down during their extended stay and this, coupled with idling buses, is an emission source that will be blown into the Park. Why is this not addressed in the MRP/DEIS? The NPS should also be a leading advocate for aggressive air quality measures being implemented in such places as San Francisco where remote emissions originate that affect Yosemite.*
>
> (Individual; Correspondence #2939)

Response: The approach to the air quality study uses the best available information. Passenger vehicles and buses were considered in the modeling, which incorporated the highest (most conservative) emission factors from EMFAC2007 for the air pollutants, and account for the emissions from start, running and idling exhaust. In addition, the ROG emission factors include diurnal, hot soak, running and resting emissions, and the PM10 & PM2.5 emission factors include tire and brake wear.

Concern 162: The NPS should reduce the number of vehicles allowed into the Valley in order to reduce air quality impacts.

> *If you want to do something productive to combat the overuse of the valley area, then why not restrict the number of vehicles that are allowed to enter the valley area of the park each day. We all know how terrible traffic and parking can get in the summer time. Why not reduce the pollution and reduce the amount of illegal parking destroying the habitats along the roadsides.*
>
> (Individual; Correspondence #2480)
>
> *One of the most troubling things I found on the DEIS is the Vehicle Pollutant Estimates. I would hope that one of your goals would be to reduce air pollution. That is good for the park and good for the visitors. I'm not sure if you are aware but air pollution can cause real health problems. Even permeant ones. I read that Asthma can be caused by pollution from cars and trucks. I think you have a responsibility to make the park a healthy place to visit. From what I can tell, during the summer months, the air quality could be considered un-healthy and even illegal. Especially for children. Sometimes it's hard to see across the valley and the Smog is pretty thick. I am alarmed by this problem in*

the park and shocked that your favorite Alternate #5 reduces some air pollutants but actually INCREASES some other air pollutants! That is UNACCEPTABLE. Any plan that the NPS adopts, should most certainly reduce all types of air pollution in the Merced River area! While Alternative 4 is not perfect, it at least maintains pollution levels or reduces them in all categories. I would ask the NPS to make sure any plan REDUCES air pollution in the park. Anything else is unacceptable.

(Individual; Correspondence #2622)

I urge the Park Service to do more to protect the air of the Merced River corridor. No one visits our national parks hoping to breathe toxic vehicle fumes. The opposite, of course, is true. But the encroachment of commercial interests and the support of some politicians for these interests threaten to make the air of the Merced River corridor even worse...Yosemite National Park is still a magnificent place to visit, but to improve its air quality, it needs stricter rules on vehicles and road use. National Parks must never be confused with amusement parks, and their air quality shouldn't be degraded by commercial interests such as unnecessary development, swimming pools, or an ice rink.

(Not specified; Correspondence #10135)

Response: By limiting the number of vehicles in Yosemite Valley to a maximum "at one time" number to manage capacity, the air quality analysis has indicated that there will be local, long-term, minor beneficial air quality impacts to Yosemite Valley associated with vehicle emissions. Please see "Affected Environment and Environmental Consequences" (Chapter 9) Air Quality, for additional information on this topic.

Concern 163: The NPS should prioritize reducing the carbon footprint of the park to reduce air quality impacts.

The river environment is mostly degraded by air pollution and noise. None of the options name a reduction in the carbon foot print as a goal.

(Individual; Correspondence #1194)

Response: The NPS has prioritized reduction of the park's carbon footprint as outlined in the "2020 Strategic Vision" for Yosemite National Park (NPS, 2012). The NPS has identified a number of strategic initiatives and has prioritized reducing energy consumption by 35%, diverting 65% of its waste, and updating its vehicle fleet to be more energy efficient. Also, please see response to Concern 165 regarding climate change impacts.

Concern 164: The NPS should implement practices to limit impacts to air quality during prescribed burns.

Although most of the proposed project is not located within the jurisdiction of the District and air quality in the San Joaquin Valley has improved significantly, the Valley faces many air quality challenges to meet the health-based air pollution standards. Towards that end, the San Joaquin Valley Air Pollution Control District (District) recognizes the importance of prescribed "planned ignition" burning as a means of reducing porential fuels and longer-term air quality impacts.

(Civic Group; Correspondence #3540)

The District requests that the Park limit emissions during CARB or local air pollution control district declared "No Burn" days to minimize smoke impacts to sensitive receptors. This can easily be done by limiting the project to smaller "manageable" acreage burns or short-duration burn windows (3-5 days) and effectively communicating these actions to the District and the public.

(Civic Group; Correspondence #3540)

Response: Fire management is outside of the scope of this plan. However, the NPS works closely with local and state regulators to protect air quality during prescribed fires, including mitigations such as matching

emissions with smoke dispersion conditions. A number of NPS employees at Yosemite are dedicated to fire information, public information, and education.

Other Comments—Global Climate Change

Concern 165: The NPS should more thoroughly address the potential impact of climate change on the Merced River.

> *Reducing the overall "carbon footprint." Climate change is affecting resources in the park and river corridor, and driving vehicles also contributes to congestion and air pollution in the valley while contributing to climate change. Therefore, I would like to see a section in the plan focused on reducing the overall carbon footprint and greater efforts to reduce driving. Some proposed steps such as increased shuttle service and formalized parking areas, already address this concern. I believe more efforts to encourage walking and bicycling instead of driving within the valley are needed, including greater promotion of trails and signage. In addition, creative ways must be found to encourage use of the shuttles. Could the hotel and lodge be required to provide shuttles from El Portal, for example? Could there be financial incentives for residents of nearby communities to use shuttles/buses rather than driving to the park? Could an additional fee be charged for those wanting to drive into the valley itself for day use rather than take a shuttle?*
>
> (Individual; Correspondence #1947)
>
> *Suggest you thoroughly discuss the potential impacts of climate change on the Merced River and its values, as well as the cumulative, or synergistic effects of proposed actions and climate change effects. Despite the fact that global climate change could have dire consequences for the Merced River and all of its values, the draft addresses this issue only in terms of the impact of the alternatives on greenhouse gas emissions. The NPS admits global warming has changed the water cycle and caused sea level rise in California; that the precipitation mix of snow and rain has shifted in favor of less snow and more rain over the last century; and that the Sierra Nevada snowpack is melting earlier in the spring. Temperatures in the region are expected to rise significantly during the 21st century, continuing these trends. Further, the draft acknowledges that "these changes have significant implications for water supply, flooding, aquatic ecosystems, forest health, and recreation, both throughout the state and within Yosemite National Park." The draft says observations and modeling of surface-groundwater pumping on streamflows in the Merced River is small. But, will this be the case if climate change results in drops in groundwater tables? How will visitor impacts on resources be exacerbated by climate change, and what will the NPS do when these combined impacts become reality?*
>
> (Individual; Correspondence #2273)

Response: Additional discussion regarding the effects of climate change are included in the Hydrology, Floodplains, and Water Quality, Wetlands and Vegetation; Wildlife; and Special Status Species analyses within "Affected Environment and Environmental Consequences" (Chapter 9). These sections are now cited in the Energy and Climate Change sections of Chapter 9.

Resources—Natural (Soundscapes)

Concern 166: The NPS should prohibit motorcycles in the park, or take actions to limit their impact, because the noise impacts the natural soundscape and negatively affects visitor experience.

> *I think motorcycles need to be prohibited. The noise some of them make with their gears is very loud and destroys the ambiance.*
>
> *(Individual; Correspondence #2228)*
>
> *The MRP proposes no management action to address extremely loud vehicle noise from motorcycles with altered mufflers. Motorcycles often roar through Yosemite Valley, with big groups on holiday*

weekends, and fill the road corridor with an inescapable loud noise that can be heard for miles into the wilderness. This noise not only exceeds NPS soundscape management standards and the requirements of the Wilderness Act and the Wild and Scenic Rivers Act, it also violates NPS regulations and the California Vehicle Code.18 Many climbing routes in Yosemite Valley are close to the highway, and climbers often find it impossible to hear each other's climbing signals above the noise of vehicles. This is particularly true on Cathedral Rocks. Other parks have taken specific management action to protect Park soundscape,19 and to correct the problem in Yosemite Valley the MRP should propose the following.

- *Encourage quiet and courteous motorcycle riding through education.*
- *Discourage use of modified exhausts on motorcycles that increase noise levels.*
- *Require groups of organized motorcycle riders to acquire a special use permit, and an application system for organized motorcycle riders should go through the appropriate NEPA analysis.*
- *Enforce 36 CFR 2.12(i) limiting vehicle noise to 60 decibels at 50 feet.*
- *Enforce 36 CFR 2.12(ii) prohibiting "unreasonable" noise, judged from the totality of circumstances.*
- *Issue "fix-it" tickets for modified mufflers, requiring documentation that a modified muffler has been replaced with a compliant one, as CHP officers do.*

(Individual; Correspondence #3689)

Response: The proposal to prohibit motorcycles in the park is beyond the scope of this plan. However, the prohibition of motorcycles in the park would have to go through the Code of Federal Regulations' rule-making process, which includes publishing the proposed regulation in the Federal Register and allowing a public comment process. 36CFR 2.12 prescribes acceptable decibel levels for motorized equipment or machinery that could be regulated at the park-level through the Superintendent's Compendium.

Concern 167: The NPS should ban generators because the noise impacts the natural soundscape and negatively affects visitor experience.

I would like to recommend making all of Yosemite National Park generator free. NO GENERATORS! It's very irritating listening to someones generator run from early in the morning until late at night. I know there are restrictions on when a generator can be run but most people do not follow it, and it's almost never enforced.

(Individual; Correspondence #1635)

I would also recommend banning all generator in the entire Park. Something really needs to be done about that. It's actually my biggest concern. Noise and air pollution does not give you an real yosemite experience.

(Individual; Correspondence #1636)

Response: Noise impacts are addressed in the soundscapes impact topic. The noise impacts vary across Alternatives 2–6, particularly with regard to varying visitor use and traffic levels. Noise generated by Honda portable generators range from 58-76 dB(A) at 3 meters, which translates to 44-62 dB(A) at 15 meters. 36 CFR 2.12 prohibits "operating motorized equipment or machinery that exceeds a noise level of 60 decibels measured on the A-weighted scale at 50 feet (i.e. roughly 15 meters), and most portable generators do not exceed this noise level. 36 CFR 2.12 also prohibits "noise which is unreasonable", which authorizes NPS to establish quiet hours in campgrounds and other locales.

Concern 168: The NPS should comprehensively address noise impacts within the EIS in order to protect natural soundscapes and river values.

However, there are a few glaring examples where the Park could make improvements to protect and enhance ORVs while also addressing longstanding concerns by climbers regarding noise. As with the West Valley viewshed, the soundscape in this area is a significant part of the climbing experience and should be protected and enhanced in the Plan. Climbers are uniquely impacted by noise in the West Valley and possibly by some proposals in Alternative 5. These include unmanaged motorcycle noise, potential garbage collection (especially if the Eagle Creek Campground is built; anyone who has bivouacked on a wall in the Valley above a campground knows that garbage collection is often the first thing they hear in the morning), noise from the wood yard just west of El Capitan along Northside Drive, RV generators in campgrounds, and megaphones used by the Green Dragon tour busses. The Wild and Scenic Rivers Act requires the Plan to identify these noise sources as adverse effects to the Recreation ORV "with appropriate strategies detailed for their resolution."17 The Plan presents a rare opportunity for the Park to comprehensively address these noise issues and bring them under management control.

(Individual; Correspondence #3689)

Also, the loudspeakers commonly used with the Green Dragon tour guides is too loud and should be eliminated by requiring all passengers to use headphones and/or limit the locations that the loudspeaker can be used, especially beneath El Capitan and the Cathedral Rocks where climbers easily hear this unwanted noise every day.

(Individual; Correspondence #3689)

Noise pollution continues to be a major concern for climbers. The AAC strongly urges the Park to enforce motorcycle noise restrictions, minimize noise from the Green Dragon, relocate the woodcutting yard, and seek other measures to address the growing noise pollution problem in the Merced River corridor, thus restoring Yosemite Valley to a more natural state, as befits this valued international destination icon. The woodcutting yard at the base of El Cap is another disturbance to the visitor experience. The AAC strongly supports relocating the woodcutting yard away from the base of El Cap, which produces highly disturbing chainsaw noise for the public climbing above.

(Individual; Correspondence #3694)

Response: Noise impacts are addressed in the soundscapes impact topic. The noise impacts vary in Alternatives 2–6, particularly with regard to varying visitor use and traffic levels.

Resources—Cultural

Concern 169: The NPS should consider each of the unevaluated historic properties as "eligible for the National Register" for purposes of assessing cumulative effects and potential adverse effects to historic properties as an "adverse effect."

As recommended above, the NPS should compile documentation that clarifies which activities may adversely affect which historic property and in what manner. In addition, for some activities, the NPS may not have developed sufficient design detail to determine whether historic properties, especially archaeological sites, may be affected. We understand that NPS has proposed to complete the assessment of effects for these activities in the context of subsequent reviews of component projects. We do not object to this approach and recommend that this process be incorporated in the Section 106 Programmatic Agreement for the Plan/EIS. However, for the purposes of assessing the potential cumulative effects of the program on historic properties, we recommend that the NPS consider each of the potential adverse effects to historic properties as an "adverse effect."

(Individual; Correspondence #8332)

The NPS has not evaluated each building, structure, or archaeological site within the area of potential effects for eligibility for the National Register. We understand that NPS has proposed to complete

evaluation of these properties in the context of subsequent reviews of component projects. While we do not object to this approach, we recommend that this process be incorporated in the Section 106 Programmatic Agreement for the Plan/EIS.

The limitation of this approach, however, is the difficulty of assessing the potential cumulative effects of the program on historic properties. Therefore, we recommend that the NPS consider each of the unevaluated historic properties as "eligible for the National Register" for purposes of assessing cumulative effects.

(Individual; Correspondence #8332)

Response: In accordance with the National Historic Preservation Act (NHPA), the NPS must make a reasonable and good faith effort to carry out appropriate efforts to identify historic properties. The agency official may also defer final identification and evaluation of historic properties if it is specifically provided for in a programmatic agreement executed pursuant to § 800.14 (b). Although a phased identification and evaluation effort is allowed pursuant to § 800.4(b)(2), the NPS has assumed eligibility for the following resources that have not yet been evaluated for the National Register of Historic Places for the purposes of the assessment of adverse effects: Archeological resources in Segment 1, Yosemite Lodge, Housekeeping Camp, Yosemite Valley Traditional Cultural Properties, Historic archeological resources in Yosemite Valley, Foresta Rd., Hennessey's Ranch, Rancheria Flat Mission 66-Era Employee Housing and Infrastructure, Village Center and Old El Portal, Wawona Campground, and Wawona Road.

Concern 170: The NPS should take additional management actions to protect and enhance the natural and cultural values in the El Portal segment of the river.

Protect the cultural values and restore the natural values at Patty's Hole in El Portal. ... Protect and restore designated wetlands in El Portal.

(Individual; Correspondence #3325)

Response: While the Alternative 5 (Preferred) in the MRP DEIS did not propose development near the main wetland pond feature in El Portal (near the bulk fuel storage facility), changes between the draft and final plan propose housing development in proximity to this wetland. Changes between the draft and final plan also increase the size of the parking lot adjacent to the wetland at Abbieville. Subsequent planning and design would ensure that all future development conforms with NPS policy to protect wetlands under the Clean Water Act, and avoid, minimize, or mitigate any adverse impacts on wetlands.

This proposed housing is also adjacent to the river access point known as Patty's Hole. The proposed housing development at this site is likely to lead to increased use at this riverside site, as it is within a 5-minute walk of the proposed housing. The NPS would protect riparian vegetation and cultural resources with fencing, and direct visitors to hardened areas most able to handle visitor use.

Concern 171: The NPS should describe demolition and archeological excavation as "destruction or damage" rather than "removal," as required in the Code of Federal Regulations.

The Plan/EIS uses the word "removal" to describe demolition, archaeological excavation, and the moving of buildings or structures. The Section 106 regulations describe demolition and archaeological excavation as "destruction or damage" and use "removal" only to mean moving of buildings and structures. See 36 CFR 800.6(a)(2)(i) and (iii).

(Individual; Correspondence #8332)

Response: The NPS has updated the language in Appendix J to reflect the terminology and documentation standards in 36 CFR 800.

Concern 172: The NPS should compile documentation that clarifies which activities may adversely affect which historic property and in what manner.

As recommended above, the NPS should compile documentation that clarifies which activities may adversely affect which historic property and in what manner. In addition, for some activities, the NPS may not have developed sufficient design detail to determine whether historic properties, especially archaeological sites, may be affected. We understand that NPS has proposed to complete the assessment of effects for these activities in the context of subsequent reviews of component projects. We do not object to this approach and recommend that this process be incorporated in the Section 106 Programmatic Agreement for the Plan/EIS. However, for the purposes of assessing the potential cumulative effects of the program on historic properties, we recommend that the NPS consider each of the potential adverse effects to historic properties as an "adverse effect."

(Individual; Correspondence #29406)

Response: Please see response to Concern 90.

Concern 173: The NPS should revise its range of alternatives to achieve a more appropriate balance between the natural environment and historic properties that are recognized as ORVs.

Overall, the NPS has proposed significant changes to the built environment of Yosemite which will directly and adversely affect numerous historic districts and sites, some of which are National Historic Landmarks (NHLs) and properties of religious and cultural significance to Indian tribes. The alternatives do not strike the balance between natural values and recreational use that WSRA challenges agencies to find. In addition, "the section 106 process seeks to accommodate historic preservation concerns with the needs of federal undertakings through consultation among the agency official and other parties with an interest in the effects of the undertaking on historic properties" (36 CFR § 800.1(a)). All of the alternatives described and analyzed in the Plan/EIS will adversely affect historic properties. Further, the adverse effects are caused by the activities proposed to restore natural environment conditions which did not exist at the time the river system was designated in 1987, and, in fact, have not existed since Park development in the early 20th century. These historic properties have coexisted with the river in a free-flowing condition and with excellent water quality, as was acknowledged in the 1987 designation legislation. Therefore, we urge the NPS to revise its alternatives and analysis to better achieve a balance between the natural environment and the historic properties that are recognized as ORVs.

(Individual; Correspondence #29406)

Response: Please see response to Concern 102.

Concern 174: The NPS should clarify its criteria for what historic resources are included as Cultural ORVs.

The SHPO shares the opinion expressed in ACHP's comment letter: "No human activity would have occurred in this area but for the Merced River and the landscape it carved out of the High Sierras." If the MRP were not being undertaken at this time, it is unlikely that NPS would be pursuing this suite of projects within the river corridor, many of which have the potential for adverse effects to known historic properties. Because the goal of WSRA is to protect and enhance river values, it seems logical that historic properties within the river corridor affected by the MRP are river-related.

(Individual; Correspondence #29405)

Furthermore, including the entire YVHD in ORV 10 would afford these properties the greatest regulatory protection possible under WSRA at a level corresponding to the other historic properties that are included in the Cultural ORVs. This approach would demonstrate a full commitment by NPS to protect and enhance these resources.

Accordingly, the entire YVHD should be part of ORV 10, which should result in greater protection of historic properties (and Cultural ORVs) under WSRA, NEPA, and Section 106.

(Individual; Correspondence #29405)

The NPS estimates that numerous historic properties which document this use and enjoyment are located in the area of potential effects for this Plan/EIS: 4 National Historic Landmarks (NHLs), 12 historic districts (5 of which are archaeological districts), and 31 individual buildings, structures, objects, and sites. In addition, some 472 archaeological sites, for which NPS has not determined eligibility for the National Register, are located in the area of potential effects. While NPS has acknowledged that specific historic properties are ORVs for the Merced River, it is unclear why some historic properties are included and others are not. No human activity would have occurred in this area but for the Merced River and the landscape it carved out of the High Sierras.

(Individual; Correspondence #29406)

Response: Please see response to Concern 38.

Concern 175: The NPS should adopt a streamlined review process for individual undertakings, and include the process in the Merced River Plan.

The ACHP recommends that the parties consider adopting the process for streamlined review of individual undertakings stipulated in the 2008 NPS' Nationwide PA. It provides a clear and consistent framework for streamlined review of undertakings that are unlikely to adversely affect historic properties. Whereas the Nationwide PA stipulates that the NPS will follow the Section 106 review process in the implementing regulations (36 CFR §§ 800.3-7) for individual undertakings with the potential to adversely affect historic properties, the parties may wish to develop an alternate process for these reviews and include it in the Merced River Plan PA.

(Individual; Correspondence #29406)

Response: Please see response to Concern 90.

Concern 176: The NPS should provide supplemental cultural resource documentation for consulting parties in order to meet Section 106 criteria.

With that in mind, the SHPO supports the recommendation made by the ACHP in its May 2, 2013, letter to NPS that the agency prepare a standard Section 106 consultation package for all consulting parties. The supplemental consultation package should present the consultation information in a more accessible manner than the three-volume Draft Environmental Impact Statement (EIS), which does not meet the documentation standards for Section 106 consultation found at 36 CFR 800.11.

(Individual; Correspondence #29405)

Response: Please see response to Concern 90.

Resources—Cultural (Historic Resources)

Concern 177: The NPS should retain all historic resources in the park because they are irreplaceable cultural resources.

No more historic buildings or structures should be removed. Not the bridges, not the buildings, not the cabins, shelters

(Individual; Correspondence #2275)

Our greatest concerns focus upon the immense lack of respect being given to some of Yosemite's most precious resources...many of her historic structures, stone bridges, small historic wooden cabins, historic outbuildings, unique tent cabins, and the once wonderful Craftsman style cabins in Curry Village. I am not alone in my thinking, pleading and love for the TRULY ENDANGERED NON RENEWABLE RESOURCES in Yosemite, ITS HISTORIC BUILDINGS, structures and glorious handmade stone bridges.

PLEASE stop the needless destruction of American History.

(Individual; Correspondence #2472)

Response: In accordance with the National Historic Preservation Act (NHPA), the NPS must consider ways to avoid, minimize or mitigate adverse effects to historic properties. Examples of mitigation and avoidance measures include retention, relocation, or adaptive re-use of historic properties. The NPS considered such options through the NHPA Section 106 consultation process, which included the active participation of the State Historic Preservation Office, the Advisory Council for Historic Preservation, traditionally-associated American Indian tribes and groups, and other consulting parties. Each action alternative in the plan makes different choices about the retention or elimination of visitor facilities (which includes historic properties), based on the goals of that alternative. Alternatives 2 and 3, for example, require the removal of a greater number of facilities in order to meet those alternatives' restoration and visitor experience goals. Through the NHPA Section 106 consultation process, the NPS made a number of modifications to Alternative 5 (Preferred) to reduce that alternative's adverse effects to historic properties. These changes include the retention of Sugar Pine Bridge and numerous historic tent cabins at Boys Town. The NPS, the SHPO, the ACHP and the consulting parties will execute a programmatic agreement (Appendix I) that will provide guidance on future consultation efforts to resolve adverse effects to historic properties.

Concern 178: The NPS should retain and rehabilitate the Residence 1 in place.

I believe Residences 4 & 5 were relocated from the vicinity of Residence 1 to the housing area leaving Residence 1 alone at its present location. The reason for leaving this residence at its present location is part of its historic character as such it should remain where it is and be rehabilitated for use in place.

(Individual; Correspondence #2254)

The removal of the Old Superintendents House (Residence 1) to another location would be an alteration to the Yosemite Valley and Yosemite Village Historic Districts, could cause the building to become ineligible for National Registry and, it would lose it's connection to it's historical location. While there would be a record of it's existence and the placement of a historical sign, seeing a plaque with a picture and description is not the same as seeing the building in it's original location and making the historical connection to the area. As an example of National Park Rustic Architecture, it should be in a location where the public can see it.

(Individual; Correspondence #2460)

With insufficient information on the functioning of the Merced River and doubt regarding the actual harm caused by the bridges, Park managers would be acting precipitously to take the drastic and irreversible step of demolishing significant historic bridges, without first exhausting non-destructive environmental restoration methods. The National Trust strongly recommends that the preferred alternative be amended to incorporate the more conservative'and conservationist'approach which effectively seeks protection and enhancement of both historic bridges and hydrological and biological values as contemplated in Alternative 6.

(Civic Group; Correspondence #8328)

The Plan fails to acknowledge the fundamental importance of integrity of location for the Superintendent's House (Residence 1), whose visuall

(Civic Group; Correspondence #8328)

... while the narrative on ORV 10 consistently refers to the ORV as reflecting a cultural landscape, with the exception of the Mist Trail, th

(Civic Group; Correspondence #8329)

The Management Standard calls for 70% of the existing elements to be in "good" condition and none in "poor" condition, an admirably high standard. The red flag here is the word "existing." The LCS, by its very nature, only assesses existing structures; if there is no structure, there is no listing. Thus, while deterioration of structures might result in adverse effect or degradation, the demolition of a structure

would not. To give one absurd but very real possible outcome, moving or demolishing Residence 1 (currently in poor condition) could actually result in an improvement of the overall condition of the ORV. It is implausible that the NPS might actually believe that the loss of resources is less harmful than the deterioration of resources; clearly, the ORV management program needs to be overhauled. ... we would suggest that at an absolute minimum, the demolition of a resource should be weighted twice as heavily as one being found in poor condition.

(Civic Group; Correspondence #8329)

The NPS states in its conclusion on "Protecting and Enhancing ORV 10" that it will enhance the ORV to a point above the management standard by rehabilitating the Superintendent's House (Residence 1). MRP at 5-89. This, of course, would be a meaningful remedy if the NPS proposed rehabilitating the structure in its current historically significant location. However, the preferred alternative would move the structure out of its context and out of the river corridor. As the NPS correctly acknowledges elsewhere in the MRP, doing so will destroy the structure's integrity of setting and location, rendering it a noncontributing resource to the Yosemite Valley Historic District, and by definition removing it from the ORV. Thus, two of the fifteen non-NHL elements will be lost. If these structures were merely deteriorating, that alone would put the ORV at the very edge of the threshold for a WSRA adverse effect (13.3% as opposed to 15% of non-NHLs in poor condition) but clearly demolishing a building is far worse than a building being in poor condition. Thus, one can reach no other conclusion but that the preferred alternative would result in an adverse effect to ORV 10. Since the entire management program is focused on condition, the trigger points and corrective management actions are moot.

(Civic Group; Correspondence #8329)

The NPS has selected the List of Classified Structures (LCS) as its indicator for ORV 10. In some regards, the LCS is an appropriate choice, as it provides a consistent means for assessing the condition of historic structures according to a straight-forward "Good-Fair-Poor" rating. Of course, committing to protect historic properties would be easier if the current baseline condition of these properties was acceptable. Regrettably, many historic resources in Yosemite are in fair or poor condition. However, excluding these resources from the plan because improving their condition would be too costly is not an acceptable position for the National Park Service to take.

(Civic Group; Correspondence #8329)

Response: Under Alternative 5 (Preferred), the Superintendent's House and Garage (Residence 1) would be demolished. As part of the Section 106 compliance process, the NPS considered a number of options for the Superintendent's House and Garage (Residence 1) These options included elevation of the buildings in place or relocation and stabilization of the Superintendent's House. The options to elevate or stabilize the buildings to prevent excessive flood damage were dismissed because they do not guarantee protection of the buildings from flood damage. (The buildings were severely flooded in the 1997 flood and have not been used since.) The option to relocate the Superintendent's House was dismissed because it would result in adverse effects to the historic NPS housing area as well as to the buildings themselves due to relocation.

Concern 179: The NPS should retain historic bridges, such as Sugar Pine Bridge, in order to meet National Historic Preservation Act obligations.

The existing bridges should be granted historic status and left as fine examples of stonework craftsmanship.

(Individual; Correspondence #87)

To better protect and enhance historic properties, the National Park Service should change Alternative Five in the following ways: Retain all historic Merced River bridges and undertake river restoration projects that avoid harm to historic properties

(Individual; Correspondence #1851)

Also, the bridge is historic and beautiful and should not be removed.

(Individual; Correspondence #2604)

I am also concerned about the proposed destruction of the Sugar Pine Bridge. This historic stone bridge was built in 1928 (40 years before enactment

(Federal Government; Correspondence #2702)

We also urge the NPS to explore options which would allow for the retention of the historic Suga Pine Bridge.

(County Government; Correspondence #2956)

Sugar Pine Bridge should be preserved and restored if needed. The National Historic Preservation Act directs federal agencies to preserve the historic properties under their control and the legislation designating the Merced River as Wild and Scenic does not require the bridge's destruction. I do not believe that the Park Service may simply ignore its responsibilities under the National Historic Preservation Act to protect the Sugar Pine Bridge and find no justification for robbing Yosemite of this iconic landmark.

(Individual; Correspondence #3139)

Response: Under Alternative 5 (Preferred), Stoneman and Ahwahnee Bridges would remain in place and mitigations to address the river's free flowing condition would be implemented. To address the localized impacts that have been attributed to Sugar Pine Bridge, the NPS will initiate a study to assess the merits of various long-term bridge management strategies. The study will first assess the nature and extent of impacts associated with the bridge, and then identify and test potential mitigation measures. If mitigation measures fail to meet defined criteria for success, consideration of bridge removal would involve a public review process and additional environmental compliance.

Concern 180: The NPS should preserve the historic integrity of the Merced Lake High Sierra Camp to meet National Historic Preservation Act obligations.

- The existing color scheme of the cabins at Merced Lake should be maintained. The cabins are generally not visible very far from the camp due to their being located in a mature forest, so they are hardly an eyesore until you are almost in the camp. White canvas with green trim is a historic, "signature" motif associated with Yosemite and the HSCs

(Individual; Correspondence #3649)

"If the camp remains, as proposed in Alternatives 5 and 6, the NPS will ultimately replace the tent fabric with colors that blend within the landscape, such as gray, brown or green, so as to reduce contrast (the tents are currently white canvas)." ... Altering the historic color of the tent fabric [at Merced Lake High Sierra Camp] – assuming the white color of the tents is a character defining feature - has the potential to adversely affect the camp.

(Civic Group; Correspondence #8329)

There are several elements of the MRP's treatment of the Merced High Sierra camp that are unclear to us. First, Table 9-239, states that the demolition of contributing resources in the Merced Lake High Sierra Camp Historic District would have no adverse effect. It is hard to understand why that would be so, as 11 of 22 tents (also described as contributing in table 9-235) are proposed for removal. But see Table J-4, which says that the loss of beds will not result in the loss of contributing resources

(Civic Group; Correspondence #8329)

Response: The NPS identified several management considerations under WSRA associated with the existing camp. The white tents create a high contrast with the surrounding natural landscape, which is a concern for the Scenic ORV. In addition, current use levels associated with the camp affect values associated with the Recreational ORV. Under Alternative 5 (Preferred), 11 of the 22 historic tent cabins would be removed and the

NPS would change the color of the tent fabric to be less visible. The removal of these 11 tent cabins will reduce the capacity of the camp from 60 to 42 thereby reducing the encounter rates on the trail in the vicinity of the camp. The removal of cabins and changing the color of the tent fabric will reduce the visual impacts of the structures as viewed from designated Wilderness, thereby enhancing the Scenic ORV.

The adverse effect of this action would be minimized by retaining the spatial organization of the camp by leaving the pathways and tent pads in place. Although there are adverse effects to the camp under Alternative 5 (Preferred), the historic integrity of the camp will not be lost.

Concern 181: The NPS should remove the historic bridges in order to restore Yosemite Valley to a more natural setting.

> *I favor restoring the valley to a more natural environment, even if it requires removal of an artistic and historical stone bridge.*
>
> (Individual; Correspondence #1038)

Response: See response to Concern 110.

Concern 182: The NPS should remove Residence 1 rather than relocate it.

> *... rather than completely remove Residence 1, the preferred alternative suggests even moving that structure over to the NPS housing district, further congesting that area.*
>
> (Individual; Correspondence #1617)
>
> *I do not support relocating Residence 1. This smacks of the "zoo" created in Wawona. The building should be recorded and removed.*
>
> (Individual; Correspondence #2989)
>
> *All are agreed that Building #1 needs to be removed. But it is a waste of tax-payers money to attempt to move it or rebuild it nearby. It should be carefully photographed for historic purposes, then carefully dismantled, being careful to save lumber and timbers. The timbers can be cleverly repurposed to make historic signposts and bulletin boards, replete with a small plaque that explains the reuse of the timber. In 1979, when Superintendent Robert Binnewies first arrived for duty, he was the first Yosemite Superintendent not to live in Building #1. He recognized the multiple complications of the unsuitable location in the meadow. He and his wife Midge first lived in El Portal, then purchased a private home near Mariposa. It is recommended that an oral history be recorded of this 1979 turning point and milestone for Building #1. Then the building should be carefully dismantled and never rebuilt. The foundations can be carefully removed, and the original soil restored.*
>
> (Individual; Correspondence #7815)

Response: See response to Concern 178.

Concern 183: The NPS should retain the ice rink as a historic resource.

> *The ice skating rink and Badger Pass each have historic value and should not only remain as venues but should be improved so that they provide a top-notch experience and service.*
>
> (Individual; Correspondence #2411)
>
> *The Organic act of 1916 mentions that the fundamental duty of the (Park) Service is to "conform to the fundamental purpose of the said parks, monuments and reservations, which purpose is to conserve the scenery and the natural and historic objects and the wild life therein". It is my profound belief, and the belief of many others, that the Yosemite Ice Rink does indeed fall under the category of a "historic object" thereby making it the duty of the Park Service of The United States of America to protect and defend the Yosemite Ice Rink, a facility entwined with history and culture. I hereby do plead to the United States Park Service, a Branch of the Government of the United States of America, as the protector of natural*

beauty and historic culture that it re-evaluate its position on sub-paragraph 5 of Friends of Yosemite Vs. Kempthorne to modify alternative five to preserve the Yosemite Ice Rink as a historic necessity.

(Individual; Correspondence #3668)

Response: The Curry Village ice rink was originally constructed at another location in 1929, and was relocated to its present location, then hidden behind the Curry Garage, sometime before 1955. Its adjacent maintenance buildings and Curry Garage were destroyed by an arson fire in 1977. Reconstruction and relocation was proposed in a 2010 Cultural Landscapes Report (CLR). The Merced River Plan / FEIS proposes to remove the ice rink from the river corridor and to re-establish it as a seasonal use in the original historic location, as proposed by the CLR.

Concern 184: The NPS should consider alternatives to demolition of historic buildings such as relocation or adaptive reuse to preserve historic fabric and reduce impacts of new building construction.

Revise plans for wholesale removal of dozens of historic properties at Curry Village by retaining historic cabins; historic cabins should be relocated rather than demolished, and new construction should be integrated into the historic landscape

(Not Specified; Correspondence #3711)

Have you thought about the energy that is represented by these structures, how much energy it will take to tear these structures down and how much landfill space they will use up? And generally historic structures are so much better built of so much better materials than the expensive trash built now. This is incredibly short-sighted.

(Not Specified; Correspondence #5110)

Why not use these cabins and other historic structures as examples of how historic properties can be modernized while retaining the character of these structures? Diidn't the National Park Service write Preservation Standards that we all adhere to?

(Not Specified; Correspondence #6720)

If the NPS truly wants to achieve it's sustainablility goals (LEED Gold certification) they need to keep in mind that the most sustainable structure is the structure that already e

(Not Specified; Correspondence #7219)

... in the discussion of the current condition of the ORV, NPS has included much discussion of change as a component to "any cultural system.

(Civic Group; Correspondence #8329)

The National Trust proposes that a range of adaptive use options be considered for the Superintendent's House and Garage which would not rise to the level of a Major Public Use facility but would provide a purpose for the building. One example would be to use it as a low intensity reception or interpretive center.

(Civic Group; Correspondence #8329)

We are supportive of adaptive use of historic structures and applaud the NPS for considering the adaptive use of this CCC facility [Wawona CCC camp]. However, we hope it is possible to adaptively use the building in a way that is compliant with the Secretary's Standards for the Treatment of Historic Properties and think this merits further investigation as does the proposed new construction nearby. In addition, if it is determined that the structures are degrading other river values due to their location close to the Merced, there appears to be room to move the structures a bit further from the river while maintaining their historic configuration.

(Civic Group; Correspondence #8329)

... [to move parking back from the river] in turn necessitates removal of the Concessioner General Offices and Garages (including the Concessioner Garage and four other garages all are contributors to Valley District), whose functions are planned for relocation to the Fort Yosemite area. MRP at 8-84. However, we object to the demolition of up to six historic buildings simply to reorganize parking. ... If the functions of the Concessioner buildings were relocated, other uses could be found for them, such as a location for a visitor contact center. ... We are supportive of adaptive use of historic structures and the efficiencies that come from co-location of related services.

(Civic Group; Correspondence #8329)

Response: Please see response to Concern 177.

Concern 185: The NPS should implement additional preservation of historic resources as a means of providing economic stimulus and employment opportunities.

Preservation is more than the maintenance of a shared cultural heritage - it is JOBS. Jobs for skilled crafts, Jobs for laborers, and Jobs for the Professionals to design the restorations. Please see the opportunities within the Merced River Plan to assist an area of the employment sector that was so very hard hit in the recession. We are all improving, but Architecture and Preservation would benefit from your support.

(Not specified; Correspondence #7755)

Response: The Socioeconomics impact analysis in "Affected Environment and Environmental Consequences" (Chapter 9) estimates total economic activity in terms of job creation, income to workers, and value added to the four-county regional economy. Alternative 5 (Preferred) would result in a total of 3 jobs lost in the four-county area which includes a net zero jobs gained/lost as a result of NPS spending. As a resource-based comprehensive management plan, it is not a specific goal of this plan to create NPS or private-sector jobs. It would be inappropriate for the NPS to base decisions for a reasonable and feasible plan solely on job creation rather than what is required by law or policy.

Concern 186: The NPS should retain Yosemite National Park's historic structures because their removal is not legally required under the applicable laws and policies guiding this plan.

The National Park Service's current proposal to remove and/or demolish more than 100 historic structures prioritizes the conservation of natural resources over historic resources. While the National Trust understands that the proposal to remove historic structures may be motivated in part by the years of litigation that have surrounded planning in Yosemite, removing the bridges is not legally required. Neither the WSRA nor the 9th Circuit opinion (Friends of Yosemite Valley v. Kempthorne, 520 F.3d 1024, (9th Cir. 2008)) requires the demolition of historic properties to meet river conservation goals. The WSRA specifically allows rivers that include manmade structures to be designated under WSRA (16 U.S.C. § 1286(b)). The Park Service has acknowledged that, "[i]n fact, the WSRA expressly provides for structures that are existing at the time of designation to remain." MRP at 5-21. ... destruction or removal of the historic structures would violate the National Park Service's responsibilities under the Organic Act to conserve natural and historic objects.

(Civic Group; Correspondence #8328)

Note that neither the Secretarial Guidelines, nor any other guidance, specifically considers the appropriate treatment of major facilities when the facilities themselves are historic and part of a historic resources ORV. However, the Secretarial Guidelines do specifically allow for major public use facilities in the river corridor if they are "necessary to protect the river resource." Certainly, if a facility is permitted to be sited within the river area if it protects a river resource, then a facility would be permitted if it is a river resource. Similarly, the removal of a historic structure that is itself a river resource would clearly constitute an adverse impact on a river resource. ... the [Ninth Circuit] Court has never directed the removal of any historic property; the court simply instructed NPS to look closely to ensure that facilities are sited to preserve and enhance ORVs.

(Civic Group; Correspondence #8328)

Response: Please see response to Concern 177 and Concern 179.

Concern 187: The NPS should evaluate the High Sierra Camps for National Register eligibility at a system-wide level.

> *The High Sierra Camps should be evaluated for National Register eligibility at a system-wide level. Impacts to individual elements, such as could occur as a result of this MRP and under the proposed Tuolumne Wild and Scenic River Comprehensive Management Plan Draft Environmental Impact Statement, may ultimately have cumulative effects on the system as a whole*
>
> (Civic Group; Correspondence #8329)

Response: Register nominations are being prepared for all of Yosemite's High Sierra Camps (including Tuolumne Meadows Lodge, May Lake, Glen Aulin, Vogelsang, Merced Lake, and Sunrise). Staff seeks to add necessary documentation to existing determinations of eligibility to convert them to listed properties. Actions proposed in the *Final Merced River Plan* and the *Final Tuolumne River Plan* will not affect the historic use of the High Sierra Camp Loop.

Concern 188: The NPS should seek a determination of eligibility of the historic resources in Yosemite Valley, including the Yosemite Lodge and Housekeeping Camp, to avoid adverse effects on historic resources.

> *The broad scope of demolition proposed in the MRP continues with these two complexes, which have not yet been evaluated for National Register-eligibility. At Yosemite Lodge, the eight buildings that are part of what the plan describes as "Thousand Cabins" are actually the last remaining buildings from the original early 20th century Yosemite Lodge which was replaced with the mid-century complex there today. The MRP proposes removal of these eight buildings (which are now used for employee housing and thought of as unkempt) and returning the area to a natural state.*
>
> *We believe that the buildings should be rehabilitated as necessary, retained and repurposed for guest accommodations. The cabins are likely eligible for the National Register, and if so, their proposed demolition is yet another adverse effect on the historic resources of the Park. A similar situation exists at Housekeeping Camp where another 34 buildings which appear to be historic are slated for demolition. Also contemplated is the addition of new infill housing in the same areas. We encourage the NPS to undertake an eligibility determination soon so the likely cumulative and indirect effects on the historic resources of the Valley can be better understood.*
>
> (Civic Group; Correspondence #8329)

Response: See response to Concern 169.

Concern 189: The NPS should establish new design guidelines for new construction in the Park, committing to designs that will avoid visual and setting adverse effects to historic properties.

> *[Based on our participation in the consultation to date and our review of the Plan/EIS, The ACHP recommends that the stipulations of the PA address the following issues:] Design guidelines for new construction in the park - The commitment to develop and apply design guidelines which will avoid visual and setting adverse effects to historic properties caused by individual new construction undertakings.*
>
> (Individual; Correspondence #29406)

Response: The National Park Service has prepared parkwide design guidelines for all new construction, redevelopment, or modification of existing historic buildings, structures and sites as part of previous comprehensive planning efforts. A Sense of Place: Design Guidelines for Yosemite National Park (2012) will guide future design and construction efforts in the park to reduce visual and/or setting impacts.

Concern 190: The NPS should apply mothballing procedures for the tent cabin structures, and document these procedures in the Programmatic Agreement.

> *[Based on our participation in the consultation to date and our review of the Plan/EIS, The ACHP recommends that the stipulations of the PA address the following issues:] Procedures for mothballing tent cabin structures - The commitment to apply such procedures should be included in the PA, and further documentation of the procedures should be an attachment to the PA.*
>
> (Individual; Correspondence #29406)

Response: In accordance with the National Historic Preservation Act (NHPA), the NPS in consultation with the State Historic Preservation Office, the Advisory Council for Historic Preservation, traditionally-associated American Indian tribes and groups, and other consulting parties has developed a draft plan-specific programmatic agreement (please see Appendix I) to guide future consultation efforts in accordance with Section 106 (36 CFR Part 800). The resolution of adverse effects for specific actions called for in the *Final Merced River Plan/EIS* will be developed through project-specific agreements such as memorandums of understanding or more detailed programmatic agreements. Follow-on and more detailed project-specific agreements will determine minimization and mitigation measures such as those identified for planning, design and construction/implementation.

Concern 191: The NPS should revise its metric for analyzing impacts to historic properties ORVs, valuing integrity over condition, in order to retain significant historic properties.

> *As we understand it, the Wild and Scenic Rivers Act requires planning for protection of all outstanding remarkable values (ORVs) that collectively make the Merced River worthy for designation as a national wild and scenic river. However, in reviewing the MRP, it is very apparent that the overriding focus is on river-related ORVs rather than providing a balanced and cumulative assessment of adverse effects to all the ORVs. In particular, we believe those properties identified in the historic resources ORV have been inadequately discussed and that the expected adverse effects to these properties are collectively more damaging than adverse effects to other ORVs*
>
> (Individual; Correspondence #29403)
>
> *We are also concerned with the metrics that NPS has established for ORVs that are historic properties. The NPS metrics require a historic property to be in "good condition," which seem biased in favor of modern buildings or structures meeting occupancy and accessibility standards. The application of these metrics has led to inappropriate recommendations; for example, the recommendation that the Superintendent's House be moved and renovated and recommendations that numerous currently unoccupied historic buildings and structures be demolished. In contrast, a more appropriate metric for ORVs that are historic properties would be a requirement for a historic property to retain historic "integrity", as defined by the NPS in its regulations and guidance regarding the criteria for evaluation for the National Register. The elements of "integrity" are to historic properties what ORVs are to wild and scenic rivers. Therefore, if integrity is valued over condition, then the application of the metrics would result in a recommendation to rehabilitation the Superintendent's House consistent with the Secretary of Interior's Standards for Rehabilitation. Likewise, numerous unoccupied buildings would appropriately be considered for reuse or mothballed for later consideration. Therefore, we strongly urge the NPS to revise its metrics for ORVs that are historic properties and to revise the alternatives and analysis to consider these modifications to the program that would avoid adverse effects to historic properties.*
>
> (Individual; Correspondence #29406)

Response: The actions called for in the final preferred alternative retain the integrity of all historic districts, developed areas within the Yosemite Valley Historic District, and National Historic Landmarks. An evaluation of "integrity" with regard to historic properties is presented in Appendix J: *National Historic Preservation Act (NHPA) Assessment of Effect* in the *Final Merced River Plan/EIS*. Additionally, Chapter 9

evaluates the impacts of alternatives on historic resources in accordance with the National Environmental Policy Act (NEPA). Both individual actions and cumulative actions have been taken into consideration when determining that all historic districts will convey their significance and retain their National Register of Historic Properties status or eligibility under the final preferred alternative.

The metric used to monitor the condition of the Yosemite Valley and Wawona Historic Resources river values has been revised based on consulting party and peer review comments. The NPS will use the Facility Management Software System (FMSS) to monitor the physical condition of the historic buildings, structures, and sites retained in the final preferred alternative. This information will in turn help set ongoing historic preservation and maintenance program priorities in the future to ensure the river values are protected. Because all alternatives must protect and enhance river values, and the Yosemite Valley and Wawona Historic Resources river values are most notably affected by the actions called for in the final preferred alternative (rather than by visitor use, such as social trails in meadows); the NPS would not rely on the monitoring program for the river values to assess integrity of historic properties and districts. Rather, the NPS would evaluate all unforeseen future actions (those not called for in the *Final Merced River Plan/EIS*) in accordance with NEPA and NHPA public planning processes.

Resources—Cultural (Prehistoric Resources/Archeology)

Concern 192: The NPS should conduct archeological testing to inform design of the new Wawona Fire Station and other ground-disturbing actions near the Wawona General Store.

> *This [The Wawona Maintenance Yard] is a large prehistoric site and to restore the area would be the right thing to do. Although we do think some testing needs to be done to find out exactly where the site boundaries really are before deciding where the new Fire Station and other buildings should be located. Since the Fire Station is going to be built in 2014, the testing need to be done immediately to find a proper location that will not impact resources anymore then they already have been. There is a lot of work being proposed for the area near the [Wawona General Store] store. This is another area where more testing needs to be done prior to finalizing these plans.*
>
> (Tribal Government; Correspondence #2545)

Response: Under Alternative 5 (Preferred), the Wawona Fire Station is proposed to be relocated within the Wawona Maintenance Area. Construction of the new fire station will necessitate excavation and trenching for foundations, footings and utilities. An archeological investigation conducted in July 2013 provides information to identify any historical or potentially historic properties prior to this undertaking, assess the effects of the proposed actions on those properties, and examine design alternatives to avoid or mitigate effects.

Concern 193: The NPS should document proposed best practices for avoiding adverse effects to archaeological resources during restoration efforts, and include this information in the Programmatic Agreement.

> *[Based on our participation in the consultation to date and our review of the Plan/EIS, The ACHP recommends that the stipulations of the PA address the following issues:] Best practices for avoiding adverse effects to archaeological sites in tree removal, trail removal, prescribed fire, vegetation management activities - The commitment to follow such best practices should be included in the PA, and further documentation of the best practices should be an attachment to the PA.*
>
> (Individual; Correspondence #29406)

Response: Please see response to Concern 190 and 196.

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

Concern 194: The NPS should have an American Indian monitor on site when any ground-disturbing activities in the Merced River corridor take place near pre-historic sites.

> *In Appendix J, it states that "Consultation with American Indian tribes and groups is ongoing and may result in solutions that improve conditions of important places and practices". This can not be accomplished by destroying culturally sensitive areas. The tribe would like a Native American Monitor to be on site when ground disturbing activities are located near pre-historic sites.*
>
> (Tribal Government; Correspondence #2545)

Response: The need for cultural monitoring is determined through a consultation process with traditionally-associated American Indian tribes and groups. Pursuant to the NHPA, the NPS has executed a programmatic agreement that identifies appropriate consultation efforts for the actions proposed in this plan. This consultation effort will determine when and where cultural monitoring is required. It is likely that all major ground-disturbing projects, particularly in Yosemite Valley, El Portal, and Wawona, will require cultural monitors.

Concern 195: The NPS should not construct a pedestrian underpass due to potential effects to culturally significant resources.

> *The tribe is against the pedestrian underpass period! We hate this idea and feel there has to be a better solution. But we also know that the underpass will most likely go in regardless of what the tribe want, or our reasons for not wanting it to go there. It seems like the Park Service is putting the visitor experience over cultural resource protection.*
>
> (Tribal Government; Correspondence #2545)

Response: Please see response to Concern 320.

Concern 196: The NPS should enhance habitats for animals and plants of traditional cultural importance to Indian tribes and avoid direct adverse effects to known archaeological sites or sites of traditional cultural importance to Indian tribes during construction.

> *[Based on our participation in the consultation to date and our review of the Plan/EIS, The ACHP recommends that the stipulations of the PA address the following issues:] Design guidelines and best practices for habitat restoration and revegetation - The commitment to develop and apply design guidelines and best practices which will facilitate opportunities to design enhanced habitats for animals and plants of traditional cultural importance to Indian tribes and which will avoid direct adverse effects to known archaeological sites or sites of traditional cultural importance to Indian tribes in the construction of such undertakings.*
>
> (Individual; Correspondence #29406)

Response: Appendix C: *Mitigation Measures* outlines the extensive best management practices the NPS will employ during the design and construction stages of project implementation to avoid direct adverse effects to archeological sites. The NPS and American Indian tribes and groups will continue to collaborate on resources management and historic preservation activities guided by existing cooperative agreements to ensure that adverse effects to historic properties with traditional religious and cultural significance can be avoided.

Resources—Scenic

Concern 197: The NPS should not remove trees to improve iconic scenic views.

> *It sounds like you are intending to remove the conifers in back of the Ahwahnee that serve to somewhat define the area where weddings are held. Hopefully, we are wrong. That is a lovely and memorable setting and it is possible to see the mountains nearby from other angles. Don't remove these trees to "improve the views."*
>
> (Individual; Correspondence #2010)
>
> *Do not remove conifers to "improve views." The "views" are everywhere. We have never had any problem seeing the waterfalls (if there was water in them) or anything else because of a tree! Please don't cut down any trees.*
>
> (Individual; Correspondence #2010)
>
> *Thinning and removal of trees to improve "Iconic Scenic Views" and prevent trees from encroaching on meadows is landscape management that is tampering with Mother Nature. Removal of trees to improve the view of the cliffs and waterfalls while at the same time restoring and increasing riverside vegetation, which impedes access to the river and blocks views of the river, is inconsistent with any supposed goal of restoring Yosemite to a natural state.*
>
> (Individual; Correspondence #2249)

Response: Park policies affecting tree removal are well-established by other park management statements and planning documents, culminating with the Scenic Vista Management Plan. The Merced River Plan does not propose or promote tree removal except to the extent that it incorporates scenic vista management actions as Appendix H: *Scenic Vista Management Actions in the Merced River Corridor*, in order to protect and enhance the Scenic ORV.

Decisions affecting tree removal are affected by many factors, such as: whether a tree presents a hazard to visitors or motorists; whether a particular species is encroaching on meadow, wetland or other sensitive species habitat; scenic vista management goals; and trunk diameter. Research has shown that the Ponderosa Pine, a species of conifer, is propagating at rates never before experienced within Yosemite Valley, to the extent that this species is inhibiting the growth of other species that are native to park lands, thereby presenting a risk that ecologically diverse landscapes are being replaced by a monoculture. Under these circumstances and prior policies, fast-growing conifers will continue to be removed from time to time.

Concern 198: The NPS should allow access in meadows on informal trails to view scenery.

> *One of the glories of the Merced in the valley in late spring and early summer is to observe the patterns of water flowing among the rocks. The best place to see this is from the river bank, and the informal paths from the pullouts along southside drive allow visitors to experience these places. The impact analysis of scenic resources considers changes in access to historically important viewpoints. However, it does not give much consideration to access to these smaller, more intimate and often unknown views of the river. In fact, it minimizes the value of these places in the valley: "For a small number of visitors the closure and revegetation of meadow trails would be considered a limitation on access and availability."*
>
> (Individual; Correspondence #2479)
>
> *In this way, a relatively small number of photographers can continue to develop the understanding of the uniqueness of Yosemite Valley. But they need to be able to get off the formal paved walks and board walks. These smaller, intimate scenic features can be found even in areas designated as "B-Scenic: Areas included in scenic views less commonly chosen by historic photographers." Is it not possible, for example, to create clearly designated paths around the edges of the meadows so that visitors can view the meadow from various angles rather than just a "near the road" view?*
>
> (Individual; Correspondence #2479)

> *While I agree with the preservation and enhancement of those viewpoints, another description of those locations would be "crowded and over-photographed." I urge the NPS to give consideration to responsible visitor access to less iconic scenic areas as well. This would be consistent with the Plan's language that supports a visitor experience that "allows people to immerse themselves in their surroundings, taking in the sights, sounds, and feel of the river and its dramatic backdrop. These experiences, in turn, relieve stress and promote connection to the natural world." The more the alternatives try to concentrate visitor experiences to a limited number of well known "viewpoints," the less likely they are to find opportunities for contemplation and immersion in the experience of the Merced and the meadows that border it.*
>
> (Individual; Correspondence #2479)

Response: The Merced River Plan does not include site-specific trail planning or design work except to account for large-scale changes at key visitor use and support areas: Curry Village, Yosemite Village, the NPS Maintenance Area, Yosemite Lodge and Wawona Maintenance Area.

The Merced River Plan was prepared to cover specific requirements of the Wild and Scenic Rivers Act. Actions proposed in the plan are designed to address concerns related to the protection and enhancement of river values and to address user capacity. Future smaller-scale planning efforts would likely involve proposals to address specific trails and viewing areas, such as at El Capitan Meadow, Bridalveil Falls and two areas known as Swinging Bridge, one in Yosemite Valley and the other in Wawona. Members of the public will be invited to submit specific suggestions during the public comment period on these future planning efforts.

Concern 199: The NPS should retain the historic bridges because of their scenic value.

> *Fact is the bridges are a part of the beauty of the park and they provide wonderful river overcrossings, great stopping points and natural clearing to view the park for those on bike or foot. Don't spoil the experience of the majority of visitors to satisfy the whims of the few.*
>
> (Individual; Correspondence #1133)
>
> *Why must we eliminate the Sugar Pine Bridge? In addition to its beauty and history, it affords a convenient and aesthetic crossing of the Merced.*
>
> (Individual; Correspondence #2168)

Response: Under Alternative 5 (Preferred), Stoneman and Ahwahnee Bridges would remain in place and mitigations to address the river's free flowing condition would be implemented. The Sugar Pine Bridge would remain in place for the near term. To address the localized impacts that have been attributed to Sugar Pine Bridge, the NPS will initiate a study to assess the merits of various long-term bridge management strategies. The study will first assess the nature and extent of impacts associated with the bridge, and then identify and test potential mitigation measures. If mitigation measures fail to meet defined criteria for success, consideration of bridge removal would involve a public review process and additional environmental compliance.

Along with this information, the park would evaluate the cultural, physical, biological, and economic tradeoffs associated with retention versus removal of the bridge. This analysis would include scenic resources. The historic bridges contribute to the scenic qualities of Yosemite Valley and provide opportunities to view scenic areas including the river. Additionally, ecological restoration of natural conditions has a beneficial impact on scenic resources.

Concern 200: The NPS should remove trees to improve meadow ecology and to restore scenic views.

> *As for Yosemite Valley, I am in favor of restoring the meadows IF it means cutting down some of the trees. Too many trees have grown too large, restricting the view. Traditionally, the valley floor had fewer trees and it would be good to return to that.....but not all trees please....some would be nice.*
>
> (Individual; Correspondence #742)
>
> *There are too many trees in the valley, remove them to expand meadow areas and views... I have witnessed much change in the valley since I began visiting in the 1960s. Foremost of negative changes has been (1) the loss of meadows due to the increase in the number of conifer trees, and (2) the loss of view of the surrounding walls from within the valley floor also due to the expanded growth areas from too-many trees.*
>
> (Individual; Correspondence #1340)

Response: Trees are currently removed or thinned for various reasons, by mechanical means or through natural or prescribed fire. As indicated by concern statement 197, the Merced River Plan incorporates scenic vista management actions as Appendix H: *Scenic Vista Management Actions in the Merced River Corridor* to further protect and enhance the Scenic ORV.

Park management goals presently include the thinning and reduction of conifers in Yosemite Valley to protect meadows, wetlands and other sensitive species habitat; and reduce flammable fuels near roads, buildings, and other infrastructure. Fast-growing conifers will continue to be removed from time to time, in accordance with the *Fire Management Plan* and resource management policies and guidance.

Concern 201: The NPS should improve views of the night sky by implementing dark sky practices in lodging and camping facilities.

> *With increased population and urban sprawl that put out light 24 hours a day it is increasingly difficult to see the night sky due to the light pollution put off by buildings an people. The NPS should help preserve the night sky by limiting the outside lights at lodging sites and high output lights such as lanterns in campgrounds. The alternative selected should have this as a component.*
>
> (Individual; Correspondence #3251)

Response: The 2006 Management Policies direct the NPS to preserve natural lightscape values to the extent possible. The NPS is currently working to reduce light pollution and preserve a dark sky. "A Sense of Place" architectural guidelines for Yosemite National Park were recently updated to include provisions for controlling light emissions from newly-constructed or renovated buildings and other facilities. These management actions are being undertaken pursuant to NPS policy and are separate from the river plan.

Resources—Wilderness

Concern 202: The NPS should maintain the current capacity at Little Yosemite Valley backpackers campground because there are other locations in the Yosemite Wilderness where hikers can experience solitude.

> *Keeping LYV campground as it is will allow Half Dome hiking in 2 days so people who need the extra time don't feel they have to rush if they don't get a campsite. This area (if it is really crowded) is one of only a few areas where people don't experience solitude, and there are so many other spots to experience solitude in the park if that is what people are seeking. This is one of the most popular hiking trails in the park, reducing numbers to provide solitude is too restricting.*
>
> (Individual; Correspondence #95)

Response: Alternative 5 (Preferred) maintains the Little Yosemite Valley camping area as a designated camping area in the Little Yosemite Valley wilderness zone and maintains the current capacity of 150 people per night for this wilderness zone. The only reductions in Segment 1 capacity in Alternative 5 are at the Merced Lake High Sierra Camp. In this Segment, the recreation ORV (ORV19), is defined as a place where "Visitors to federally designated wilderness in the corridor engage in a variety of river-related activities in an iconic High Sierra landscape, where opportunities for primitive and unconfined recreation or solitude shape the experience" ("River Values and their Management" [Chapter 5]). The monitoring program outlined in Chapter 5 for this ORV ensures that "opportunities for primitive and unconfined recreation or solitude" are protected in this river segment.

Concern 203: The NPS should examine the impact of administrative and commercial stock use on the wilderness area in greater detail.

Several options describe the degradation of the meadow between the Merced Lake Ranger Station and Washburn lake. I would like to make it clear to those who might read this that this is Park Service stock, not concessionaire stock. The concessionaire does not graze stock at any of the high camps and packs in feed to all camps. I believe that the MRP incorrectly tries to minimize the amount of stock used by Backcountry Utilities as I have seen more than 1 or 2 mules in a typical BCU string. There is usually at least 1 full string (5 mules) plus a couple of other mules going into Merced Lake for BCU use.

(Individual; Correspondence #95)

The comment that, "elimination of day stock rides would improve trail conditions by eliminating the dust, feces, flies and urine related to stock use on these trails" is not true as 45% of the stock use is administrative and it will remain, so the benefits claimed will not occur in full

(Business; Correspondence #2818)

The DEIS is flawed in its attempt to regulate commercial stock use, which accounts for about half of overnight stock use in Yosemite Wilderness . . .Administrative and concessioner (i.e., Delaware North Corporation) stock use clearly comprises a significant portion of all stock use in Yosemite Wilderness. Yet the Merced River Plan/DEIS does not address these two major users of pack and saddle stock even though they represent approximately 45 percent (45%) of all stock use in Yosemite Wilderness. The distinction between the four major stock user groups in most cases is not clear to the recreating public. That is, most hikers, backpackers, etc., in Yosemite Wilderness would likely be unable to discern the difference between administrative, concessioner, commercial or private use of pack stock encounters either along the trail or at a particular campsite. Moreover, with the exception of the Merced Lake High Sierra Camp and the Merced Lake Ranger Station, the DEIS fails to make a distinction between existing and potential environmental impacts associated with these differing stock user groups in Yosemite Wilderness. The best available science is not able to discern the impacts associated with one group or another. Nonetheless, the DEIS attempts to propose regulations only on the commercial guide subgroup in terms of group size... Given the relative percentage of use by other stock user groups (approximately 50% of all overnight stock use), efforts in the DEIS to regulate commercially guided pack trips appear arbitrary. The arbitrary nature of the DEIS' proposal to regulate commercial guides is compounded by the fact that the park currently is in the process of preparing a comprehensive Wilderness Stewardship Plan, which the NPS admits is "the most appropriate framework" and "where commercial services will be addressed comprehensively for Yosemite's entire wilderness."

In effect, the DEIS proposes to place new restrictions on only half of overall stock use (i.e., commercial use) within 2.6% of Yosemite Wilderness. This approach appears inconsistent with NPS Management Policies (2006) regarding Recreational Pack and Saddle Stock Use . . .

We interpret the appropriate "context of visitor use planning," in this case, to be inclusive of all Yosemite's Wilderness and not the narrow ribbons of land and water that comprise the Merced and Tuolumne river corridors within the park's designated Wilderness.

(Individual; Correspondence #29325)

Response: For the Final Merced River Plan, the NPS has established a grazing capacity for the Merced Lake East Meadow of up to 58 grazing nights per season, a capacity that was based on the best available science. This capacity will apply to any stock grazed in the meadow. Additionally, the meadow will be monitored annually (as described under ORV 1 in "River Values and their Management" [Chapter 5]), with specific triggers for management action (including grazing closure).

Additionally, NPS will limit the number of packstrings allowed to resupply the Merced Lake High Sierra Camp to 7 1/2 per week.

Concern 204: The NPS should not propose limitations on commercial stock use in the wilderness without clear evidence that this type of use is adversely impacting natural resources.

> *Restrictions to commercial stock use in park Wilderness proposed in the DEIS are unjustified. There is no evidence in the DEIS of significant, let alone moderate, adverse impacts as a result of recreational stock use on natural resources such as soils, vegetation, wetlands and wildlife. In fact, the DEIS states (p. 9-195) that recent surveys found that "pack stock impacts were absent or uncommon in most subalpine meadows, with the exception of Merced Lake–East," which is adversely affected by the Park's administrative use of pack stock. The DEIS states that total recreational stock use constitutes less than 3% of all wilderness visitation. Yet it proposes limitations on commercial stock use in park Wilderness as necessary to promote the enjoyment of "solitude" by other visitors. Such decisions appear arbitrary and are better analyzed in the forthcoming parkwide Wilderness Stewardship Plan, which will address the cumulative impact of all visitor uses and which the current DEIS does not.*
>
> (Individual; Correspondence #2868)
>
> *In addition to our perspective regarding the appropriate venue by which the park must address the Extent Necessary Determination for commercial services in Wilderness, the Merced River Plan/DEIS fails to disclose the scientific basis for proposed restrictions of commercial stock use. Nowhere in the DEIS or its numerous appendices could we find documentation, for example, on the extent or severity of reported conflicts between recreational stock use and other Wilderness visitors. We also searched the Merced River plans approved in 2000 and 2005, yet nowhere could we find documentation regarding the nature and extent of this alleged conflict.*
>
> (Individual; Correspondence #29325)
>
> *The DEIS is devoid of information that would imply a need to restrict use of commercial pack stock in Yosemite Wilderness or the Merced Wild and Scenic River corridor.3 Restrictions to commercial stock use in park Wilderness proposed in the DEIS are unjustified. There is no evidence in the DEIS of significant, let alone moderate, adverse impacts as a result of recreational stock use on natural resources such as soils, vegetation, wetlands and wildlife. Quite the opposite, the DEIS makes the following claims that point to a lack of significant commercial stockinduced impacts:*
>
> - *"In (the soils resources) analysis, negligible adverse impacts were identified in areas where human visitation and pack stock use occur" (DEIS, p. 9-12).*
> - *A 2011 study conducted as part of the Merced River planning process found that "Alpine meadows exhibited…no presence of non-native species, and little to no impacts from visitor use or pack stock" (DEIS, p. 9-192).*
> - *"Pack stock impacts were absent or uncommon in most subalpine meadows, with the exception of Merced Lake– East," which is adversely affected by the Park's administrative use of pack stock" (DEIS, p. 9-195).*
> - *"Five subalpine meadows had some informal trails present, with Merced Lake–East having the most, likely due to its proximity to Merced Lake High Sierra Camp. The study could not differentiate between human and equine trailing on those sites with pack stock use" (DEIS, p. 9-198).*
>
> (Individual; Correspondence #29325)

The DEIS' omission of key underlying scientific studies supporting the proposed limit of 2 overnight commercial pack stock groups per zon

(Individual; Correspondence #29325)

Response: Although the Merced River Plan is designed to address the requirements of the Wild and Scenic Rivers Act, many of the land use activities authorized in the plan are subject to additional legal requirements such as those contained in the National Historic Preservation Act, the Endangered Species Act and the Wilderness Act. Alternative 5 (Preferred) would allow various types of commercial services to continue in the wild portions of the Merced River Corridor. This authorization triggers a requirement found in Section 4(d) of the Wilderness Act which states that commercial services may conducted "to the extent necessary for activities which are proper for realizing the recreational and other wilderness purposes" of wilderness areas.

In response to this legal requirement, the National Park Service prepared Appendix L, the Determination of Extent Necessary. Appendix L presents the National Park Service's determination regarding the amount of commercial use that is proper for realizing wilderness purposes. Commercial stock use is one of the types of commercial services addressed in Appendix L.

The Determination of Extent Necessary considers the extent to which wilderness purposes such as recreation and education are being fulfilled by visitors who are engaged in non-commercial activities. If a particular wilderness purpose is realized by non-commercial users and an area is at its recreational capacity, there is not the same degree of necessity to allow commercial services in that area as there would be in an area where use is below capacity and wilderness purposes are not being realized. As the Determination of Extent Necessary makes clear, assessments regarding user capacity and the realization of wilderness purposes informed the proposed restrictions on commercial stock use. The proposed restrictions in Appendix L were not driven by the environmental effects of commercial activities on resources.

As noted in the concern statement, the environmental effects of stock use are addressed in "Affected Environment and Environmental Consequences" (Chapter 9) of the plan pursuant to NEPA. For example, the FEIS notes the presence of some braided and rutted formal trails in several meadows along the Red Peak and Triple Peak Forks, as well as very low vegetation cover and high bare-ground levels in the Merced Lake - East Meadow (Ballenger et al. 2011), though the latter is mostly from administrative stock grazing. The NPS also considered the effects of stock use in this meadow on ORVs. The impacts of stock use in Merced Lake - East Meadow raised management concerns regarding the Biological ORV for Segment 1. For this reason, the Final Merced River Plan/EIS establishes a grazing capacity for this specific meadow.

Concern 205: The NPS should apply more narrow criteria for evaluating commercial activity in Wilderness and revise Appendix L (the Determination of Extent Necessary) to be consistent with the intent of the Wilderness Act.

Simply put, commercial use is only necessary if it fills a real need. If there is considerable use taking place in Yosemite's wilderness, and there is, there is no need for outfitters except possibly on rare instances to serve people with disabilities or those without skills and equipment.

(Individual; Correspondence #2730)

One of the largest problems with the DEIS is Appendix L, a so-called needs assessment for commercial activity. Rather than following the intent of the Wilderness Act--which made only a very narrow exception for commercial services, understood at the time to be outfitting and guiding--Appendix L makes all sorts of unsupported assertions that are not consistent with the intent of the law. ... We suggest Appendix L be scrapped as it is not an appropriate template for future NPS analyses of whether commercial services are both necessary and proper in wilderness. The prohibition on commercial enterprise is one of the most restrictive in the Wilderness Act. The reasons are many, they are not lost on

Yosemite National Park officials, and were discussed at length at the recent "commercial outfitting and the Wilderness Act" conference at Stanford University in which Yosemite officials played a major role.

(Individual; Correspondence #2730)

The assessment of what is proper for recreation conflates legal with proper. Proper is a higher standard than merely legal. It comes with more constraints. Something may be legal but it may not be proper. ... Photography is not a wilderness dependent recreation activity. At best, it is an activity that is associated by those engaged in another activity, such as wilderness camping. Thus, commercial services for photography in wilderness would not be proper. Similarly, drawing, painting, and scientific research are legitimate wilderness activities, they are not appropriate in wilderness if conducted as part of a commercial enterprise. One other activity specifically mentioned as proper defies logic, that of commercial filming. The supposed justification for this comes from the educational component of wilderness in section 2(a). ... If any filming would be allowable, it wouldn't be proper for it to be done by commercial means. ... While a legitimate use of wilderness, scientific research is not appropriate if conducted as part of a commercial enterprise.

(Individual; Correspondence #2730)

Education is a commercial enterprise as per the definition on page L-6 Appendix L. While an educational experience or guiding provided by an educational i

(Individual; Correspondence #2730)

Response: The National Park Service believes that the Determination of Extent Necessary presented in Appendix L addresses the legal requirements of the Wilderness Act and places appropriate restrictions on commercial services.

Concern 206: The NPS should be consistent in the analysis of Appendix L and provide valid reasons for any restriction of commercial use in the wilderness.

Appendix L of the DEIS states that all action alternatives would "restrict commercial use to no more than 2 overnight groups per zone per night and no more than 2 day groups per trail per day" (p. L-16) . The Appendix states that there are three reasons for this proposal, all of which appear to be essentially variations on the same reason. However, as discussed below, each of these reasons is entirely invalid. The first reason is that, because guides and the visitors traveling with them have been banned from many areas under the proposed restrictions, they may congregate in other areas and cause physical harm. Id. at L-16. However, no such evidence is provided to support this wholly speculative conclusion. Nor is there any basis to conclude that the restrictions already in place would not prevent any such outcome. The second reason is that, because guides and the visitors traveling with them have been banned from many areas under the proposed restrictions, they may congregate in other areas which could result in "crowding." Id. This potential "crowding" might then "detract[] from the wilderness experience of other visitors sharing a zone with such groups." Id. We demonstrate elsewhere in this comment letter that application of the criterion "crowding" in this sense has not been adequately supported in the DEIS. Again, no such evidence is provided in the DEIS to support this wholly speculative conclusion. Nor is there any basis to conclude that the restrictions already in place would not prevent any such outcome. The third reason given is that, because guides and the visitors traveling with them have been banned from many areas under the proposed restrictions, they may dominate other, less desirable areas. The analysis in Appendix L concludes that, if this were to occur, having guides and the visitors traveling with them in these less desirable areas will result in the "excessive commercialization of wilderness." Id. at L-16. However, given that these visitors are doing the exact same things as visitors who are present without guides (camping, hiking, fishing, etc.), it is nonsensical to assert that these visitors will somehow "commercialize" the Park. Visitors who rely upon guides to visit and enjoy a National Park should not be treated as second-class citizens; however, that is exactly the bias demonstrated by NPS in both the DEIS and Appendix L.

(Individual; Correspondence #29325)

The DEIS is deficient because Appendix L, Determination of Extent Necessary (for commercial services in Wilderness) clearly was crafted in isolation from the rest of the DEIS'if not as an afterthought. As pointed

out below in this comment letter, the Appendix in many places contains information that conflicts with information regarding the proposed alternatives and conclusions found in the remainder of the DEIS. Moreover, its proposals to restrict commercial use in Yosemite Wilderness appear to have occurred in a vacuum and are not reflected in any detail in the EIS' analysis of environmental impacts of alternatives. Appendix L represents a near carbon copy of the similar appendix found in the DEIS for Tuolumne Wild and Scenic River Management Plan (Appendix C: Determination of Extent Necessary for Commercial Services in the Wilderness Segments of the Tuolumne Wild and Scenic River Corridor). For example, the Merced River DEIS Appendix C is nearly identical to the Tuolumne River DEIS Appendix C, with one notable exception: the Tuolumne River appendix makes reference to the alternatives analyzed in the DEIS (Table C-1) and contains maps specific to the Tuolumne River segments being analyzed. The Merced River appendix fails to make reference to alternatives analyzed via its respective DEIS and does not include Merced River-specific maps. With one exception (p. L-15, mention of High Sierra Camp), the Merced Plan appendix fails to invoke the DEIS alternatives, let alone specifics. In the single reference to any DEIS alternative analyzed, only the preferred alternative is invoked.

(Individual; Correspondence #29325)

Response: As explained in response to Concern 205, the Determination of Extent Necessary is designed to satisfy legal requirements that flow from the Wilderness Act. Our response to Concern 205 also explains the factors that informed the Determination of Extent Necessary's restrictions on commercial services. The Determination of Extent Necessary was not crafted in isolation from the Merced River Plan. The Plan incorporates the commercial services restrictions from Appendix L into the Actions Common to All Alternatives section of "Alternatives" (Chapter 8).

Concern 207: The NPS should not address commercial use for only the portion of the wilderness within the Merced River corridor, but should instead complete the needs assessment of commercial services as part of the comprehensive Wilderness Stewardship Plan.

Is the intent of including this document in the Merced River Plan an attempt to pre-determine the range of alternatives in the future Wilderness Stewardship Plan? Alternatively, will the NPS be open to revising this assessment for the Merced River Corridor in the WSP?

(Individual; Correspondence #2730)

...significant changes proposed to Wilderness management, such as reducing commercial stock use, should be addressed in the forthcoming Wilderness Stewardship Plan and not in the current piecemeal fashion as is being done via both the Tuolumne River and Merced River Wild& Scenic River management plans.

(Individual; Correspondence #2868)

Significant changes proposed in the DEIS to Wilderness management, such as instituting a quota system for day hikers or reducing commercial use, should be addressed in the forthcoming Wilderness Stewardship Plan and not in the current piecemeal fashion via both the Tuolumne and Merced Wild and Scenic River management plans. Only through the comprehensive Wilderness Stewardship Plan can such changes can be considered in order for the context and their impacts, including cumulative impacts, be appropriately analyzed.

(Individual; Correspondence #29325)

NPS Management Policies (2006) state that "Commercial visitor services planning will identify the appropriate role of commercial operator

(Individual; Correspondence #29325)

The DEIS notes in numerous locations the Park Service's concurrent development of a Yosemite Wilderness Stewardship Plan/EIS that "...will

(Individual; Correspondence #29325)

Response: The National Park Service is required to address the extent to which commercial services are necessary in wilderness in any planning document that authorizes or permits such use. Because this plan would allow commercial services to continue in the Merced River Corridor, the NPS prepared Appendix L. Appendix L only includes prescriptions on commercial services in the Merced River Corridor. Decisions regarding commercial services in wilderness areas outside the Merced River Corridor are beyond the scope of this plan and will be addressed in the forthcoming Wilderness Stewardship Plan.

Concern 208: The NPS should not use the MRP regulate commercial stock use within the entire Wilderness area, as only a small portion of the wilderness area is located within the river corridor.

The Park Service failed to identify they were undertaking an 'Extent Necessary' determination for commercial use in the wilderness in their Preliminary Alternative Concepts (Appendix L). . . .There was no opportunity to provide feedback or respond to this document in the comment period or the preliminary alternatives concept workbook. The determination of commercial use in the wilderness should not be completed for just a portion of the wilderness (along the Merced River corridor), but should instead be completed as part of the overall wilderness management plan. The

commercial use will be so severely curtailed it is likely to be unrealistic and economically unviable or many outfitters to continue to conduct trips. The information in this document is not displayed on he alternative maps, and it is not clear to the reader that there are separate decisions being made n this Appendix. Because this information was not presented, and because the area of the Merced River corridor only occupies a portion of the wilderness, this Appendix should be withdrawn from this plan.

(Individual; Correspondence #3483)

As stated in the DEIS, "Yosemite Wilderness encompasses an area totaling 706,624 acres, which is approximately 95% of the total park area" (DEIS, p. 9-881). Of the Park's 800-mile wilderness trail system, only 31.8 miles (or 4%) occur within the Merced River corridor (DEIS, Table 9-147). The DEIS further notes that "within the (Merced Wild and Scenic) river corridor, there are 18,677 acres of wilderness" (DEIS, p. 9-882). Thus, the river corridor under study and the scope of the agency's authority under the Wild and Scenic Rivers Act represents merely 2.6 percent (2.6%) of Yosemite Wilderness while comprising just 4% of the Park's wilderness trail system. The DEIS nonetheless proposes restrictions on wilderness group size and commercially guided stock use that the NPS justifies as enhancing "wilderness character" via the current Merced River Plan, despite the fact that over 97 percent (97%) of designated Yosemite Wilderness lies outside the river corridor. This appears to represent a significant overreach in, if not abuse of, agency discretion and provides another example of how the current DEIS violates NEPA.

(Individual; Correspondence #29325)

The current scope of the DEIS would mean that methodology applied in the forthcoming comprehensive plan for Yosemite Wilderness (i.e., the WSP) would be both confined and driven by decisions make via the Merced and Tuolumne river plans. Yet the geographic scope of the river plans is prohibitively narrow when compared to the larger landscape to be addressed in the WSP. In fact, the "Yosemite Wilderness (is)…bounded by the Emigrant Wilderness to the north, the Hoover Wilderness to the east, and the Ansel Adams Wilderness to the south" (DEIS, p.9-881). This means that the actual study area contemplated in the WSP will, by necessity, encompass considerably more than the Park's 706,624 acres of designated Wilderness. A broad study area would be needed to ensure consistency and continuity in wilderness- and recreation-related policies among these adjacent units of the National Wilderness Preservation System managed by the U.S. Forest Service. In sharp contrast stand the current Merced and Tuolumne Wild and Scenic River plans, which if approved as drafted, would prompt Yosemite National Park to structure its otherwise "comprehensive" wilderness planning effort with a myopic view of refining wilderness-related policy that was initiated with a focus from the "inside (i.e., Wild and Scenic rivers) working outward." The current approach contemplated in the DEIS does not square with the regional and sweeping scope necessitated by current practitioners of wilderness ecosystem planning.

(Individual; Correspondence #29325)

Of the eight segments of the Merced River addressed in the DEIS, portions of seven occur within Yosemite Wilderness. Only two river segme

(Individual; Correspondence #29325)

Response: Please see response to Concern 208.

Concern 209: The NPS should revise the Merced River Plan/EIS to correct the bias against recreational horse/stock users, as the proposed management actions are too narrowly focused on the preferences of a single user group.

Nowhere does the DEIS attempt to document the preferences and desired experiences of recreational horse/ stock users, whose views regarding encounters with other user groups in Wilderness might support or vary significantly from the views expressed by hikers/backpackers. Nor was the opinion of horsemen/stock users apparently sought in crafting the DEIS. For example, horse/stock users could have been queried about their preferences for encountering large parties of backpackers or how they feel about large campsites barren of vegetation as a result of overuse by both backpackers and stock users'much as the 2005 Newman, Manning, et. al., study explored these management issues with backpackers.

The DEIS notes, but not in Appendix L, that saddle and pack stock use is an acceptable and traditional mode of travel within designated Wilderness that in most cases predates extended trips undertaken in the backcountry and Wilderness by backpacking. Therefore, reliance in the DEIS upon the views expressed by a single user group, which does not include horse/stock users and misrepresents the available science, represents overt bias in the NEPA analysis. In sum, the NPS' perception of a lack of tolerance among a subset of Wilderness backpackers when encountering other groups should not be employed as a primary criterion to reduce either pedestrian or equestrian use in one of the Nation's most visited Wilderness areas.

(Individual; Correspondence #29325)

We assume the degree of reported and documented visitor conflict in Wilderness as inferred in the DEIS is low and that such reports, if any, were made by visitors unfamiliar with horse/stock use and its long history within Yosemite National Park. We submit the attached letter from the Pacific Crest Trail Association (PCTA) as evidence of the relative lack of documented conflicts between hikers/backpackers and stock users in Yosemite Wilderness. . . .The Final EIS and Record of Decision for both the Merced and Tuolumne Wild and Scenic River management plans must acknowledge the fact that "the preference not to encounter stock parties is not shared by the PCTA," which is one of the Nation's premiere service-oriented trail organizations.

(Individual; Correspondence #29325)

Response: The NPS does not believe that there is a bias that needs to be corrected in regards to how management actions affect recreation opportunity. Alternative 5 (Preferred) proposes no change to private stock use or access as Appendix L: *Determination of Extent Necessary* applies only to commercial services.

Concern 210: The NPS should evaluate effects to visitor experience in Wilderness areas based on not only opportunities for solitude, but also on opportunities for a primitive and unconfined type of recreation.

With respect to realizing opportunities for solitude in wilderness areas, the DEIS incorrectly applies the following criterion:

Visitor experience is influenced by the number of other groups encountered during a given time period. Actions that increase crowding are considered adverse, while those that reduce crowding are considered beneficial. In high-use wilderness areas such as Segment 1 of the Merced River corridor, solitude is determined to be an area free from crowding (DEIS, p. 9-890).

This line of logic is flawed and ignores the mandate of the Wilderness Act, which directs that Wilderness provide "outstanding opportunities for solitude or for a primitive and unconfined type of recreation" (emphasis added). The word "or" means that an area only has to possess one or the other. The area does not have to possess outstanding opportunities for both elements, nor does it need to have outstanding opportunities on every acre. In addition, an area can possess outstanding opportunities for solitude even if there is variation in the degree of solitude spatially. Use of the solitude criterion alone is inconsistent with the Wilderness Act, subsequent case law, and appears to ignore fact that "the Yosemite Wilderness (is) one of the most highly visited Wilderness areas in the nation" (DEIS, p. 5-120). In perpetuating this false choice, the DEIS fails to evaluate the degree to which the Merced River corridor (at least that portion located in Wilderness) provides outstanding opportunities for solitude or for a primitive and unconfined type of recreation.

(Individual; Correspondence #29325)

Response: The commentor is correct in stating that the word "or" appears in the Wilderness Act after its reference to "opportunities for solitude" and before its reference to "a primitive and unconfined type of recreation." However, because opportunities for solitude are evaluated differently than opportunities for primitive recreation, and again differently than opportunities for unconfined recreation, the wilderness impact section of "Affected Environment and Environmental Consequences" (Chapter 9) considers these three factors separately for each alternative, as well as for actions common to all alternatives. From the perspective of the National Environmental Policy Act, it is appropriate to discuss the effects of each alternative on these attributes of wilderness character. Neither the Draft EIS nor the Final EIS is a decision document. A decision will be made in the Record of Decision, and the reasons supporting that decision will be explained in ROD.

Concern 211: The NPS should consider other options to mitigate user conflicts in Wilderness, as required by NPS Management Policies, such as visitor education, spatial or temporal methods, or adaptive management techniques.

With regard to mitigating adverse impacts from or between park uses, NPS Management Policies (2006, Section 8.1.2) state: In all cases, impacts from park uses must be avoided, minimized, or mitigated through one or more of the following methods:

- *visitor education and civic engagement*
- *temporal, spatial, or numerical limitations on the use*
- *the application of best available technology*
- *the application of adaptive management techniques*

Yet, as stated previously, the DEIS contains the following sweeping statement: "Overnight commercial trips are limited to two per zone per night…These limits apply in all zones at all times in addition to the other restrictions noted above" (Appendix L, p. L-16). The leap to mitigate perceived conflicts in the Merced River corridor by restricting commercial stock use in the current DEIS appears inconsistent with these NPS policies. The DEIS fails to invoke the option of visitor education to minimize perceived conflict. The DEIS fails to consider mitigation of a temporal or spatial nature. Nor does the DEIS propose adaptive management techniques to deal with visitor perceptions of conflict. Worse still, the DEIS proposes to adopt significant restrictions on stock use that would carry over into the forthcoming WSP.

(Individual; Correspondence #29325)

In areas of known or documented resource conflicts or damage, the DEIS should consider alternatives beyond simply eliminating stock use. Such alternatives could include but not be limited to reroutes of trails, hardening of trail surfaces, and/or seasonal or biannual limitations to certain areas. Yet the DEIS fails to invoke any such mitigation measures. Significant changes proposed in the DEIS to wilderness management such as instituting a quota system for day hikers or reducing commercial use should be addressed in the forthcoming Wilderness Stewardship Plan, not piecemeal via both the Tuolumne River plan and Merced River plan. It is only through the wilderness plan that such changes

can be considered in context and their potential environmental impact, including cumulative impacts, be fully analyzed.

(Individual; Correspondence #29325)

Response: The NPS does use mitigation actions to address user conflicts through education, spatial or temporal methods and adaptive management techniques. In the cases where the NPS has instituted restrictions it is as a part of the Determination of Extent Necessary, which only applies to commercial uses in wilderness. Within the Determination of Extent Necessary, the NPS utilizes temporal and special mitigations through allocating commercial use by wilderness zone, time of year and type of use.

Concern 212: The NPS should not reduce facilities in the Wilderness.

The Plan appears to be proposing to designate areas as wilderness, which circumvents the Congressional process. The Plan reduces and eliminates numerous historic and valued uses –contrary to what the public has said they want to see continued. Facilities that serve the greatest numbers of visitors are reduced or eliminated in this Plan.

(Individual; Correspondence #3483)

Response: Alternative 5 (preferred) does not designate new Wilderness areas. The only facility in a wild river segment that is reduced in Alternative 5 (Preferred) is the Merced Lake High Sierra Camp. The reasons for reducing the size of the High Sierra Camp are explained in response to Concern Statement 181.

Concern 213: The NPS should differentiate between what is "proper" and what is legal in Appendix L, as what is proper for commercial services is narrower than what is legal.

The assessment of what is proper for recreation conflates legal with proper. Proper is a higher standard than merely legal. It comes with more constraints. Something may be legal but it may not be proper. ... Photography is not a wilderness dependent recreation activity. At best, it is an activity that is associated by those engaged in another activity, such as wilderness camping. Thus, commercial services for photography in wilderness would not be proper. Similarly, drawing, painting, and scientific research are legitimate wilderness activities, they are not appropriate in wilderness if conducted as part of a commercial enterprise. One other activity specifically mentioned as proper defies logic, that of commercial filming. The supposed justification for this comes from the educational component of wilderness in section 2(a). ... If any filming would be allowable, it wouldn't be proper for it to be done by commercial means. ... While a legitimate use of wilderness, scientific research is not appropriate if conducted as part of a commercial enterprise.

(Individual; Correspondence #2730)

Response: This concern statement relates to the Extent Necessary Determination in Appendix L which addresses the requirements of Section 4(c) of the Wilderness Act. The Wilderness Act states that commercial services may be provided in wilderness for "…activities which are proper for realizing the recreational or other wilderness purposes." Appendix L describes various types of activities that are considered proper in wilderness. . There is no indication in the Wilderness Act or NPS policy that the term "proper" as used in Section 4(c) means that an activity must be wilderness dependent.

Concern 214: The NPS should screen all assessments and allocations in the Determination of the Extent Necessary based on whether the activity is wilderness-dependent.

The only part of the analysis that seems to make sense is whether something is wilderness dependent (see page (L-21). However, none of the previous assessments or allocations have gone through that screening criterion. If so, the document wouldn't look as it does now.

(Individual; Correspondence #2730)

Response:: Please see the response to Concern ID 213.

Concern 215: The NPS should revise Appendix L so it does not restrict commercial use in the Wilderness outside of the Merced River Corridor.

> *Of the eight segments of the Merced River addressed in the DEIS, portions of seven occur within Yosemite Wilderness. Only two river segments (Segments 1 and 5) lie entirely (i.e., 100%) ithin designated Wilderness (DEIS, Table 9-147: Acres of Wilderness in River Corridor by Segment). Three percent (3%) f Segment 3 is located in Wilderness, as is 18% of Segment 2, 22% of Segment 7, and 88% of Segment 6. Segment 7 of the Merced River corridor under study contains no designated Wilderness. Yet remarkably, and despite the agency's disclosure that a Wilderness Stewardship Plan (WSP) "is currently underway" (as noted above), the scope of the current DEIS has been expanded in an unprecedented and alarming fashion...it appears the DEIS is providing justification for proposed restrictions on commercial stock use, for example, in Segment 3 of the Merced River corridor that would in fact apply beyond the river corridor to the remaining 97% of Wilderness in the corresponding wilderness management zone. In other words, with only 3% of river Segment 3 coinciding with a zone of designated Wilderness, the DEIS nonetheless proposes to apply the "extent necessary determination" for commercial services in Wilderness within the entire coinciding wilderness zone. If correct, this would appear to represent a vast overreach in application of the extent necessary determination that would expand the scope of the Wild and Scenic River plan to tens of thousands of designated Wilderness acres beyond the Wild and Scenic corridor. If so, we again assert that the current DEIS is not the appropriate vehicle for such analyses and any Extent Necessary Determination must be made instead via the forthcoming comprehensive Wilderness Stewardship Plan.*
>
> (Individual; Correspondence #29325)
>
> *As stated in the DEIS, "Yosemite Wilderness encompasses an area totaling 706,624 acres, which is approximately 95% of the total park area" (DEIS, p. 9-881). Of the Park's 800-mile wilderness trail system, only 31.8 miles (or 4%) cur within the Merced River corridor (DEIS, Table 9-147). The DEIS further notes that "within the (Merced Wild and Scenic) river corridor, there are 18,677 acres of wilderness" (DEIS, p. 9-882). Thus, the river corridor under study and the scope of the agency's authority under the Wild and Scenic Rivers Act represents merely 2.6 percent (2.6%) Yosemite Wilderness while comprising just 4% of the Park's wilderness trail system. The DEIS nonetheless proposes restrictions on wilderness group size and commercially guided stock use that the NPS justifies as enhancing "wilderness character" via the current Merced River Plan, despite the fact that over 97 percent (97%) designated Yosemite Wilderness lies outside the river corridor. This appears to represent a significant overreach in, if not abuse of, agency discretion and provides another example of how the current DEIS violates NEPA.*
>
> (Individual; Correspondence #29325)

Response: The restrictions to commercial use in the Determination of Extent Necessary do not apply in non-wilderness. The restrictions are based on use patterns in wilderness travel zones rather than river segments. Only two of the eight zones are restricted due to the extent necessary determination: Merced Lake zone and Little Yosemite Valley Zone. These two zones are only slightly wider than the river corridor.

User Capacity and Visitor Use Management

User Capacity/Visitor Use Management System

Concern 216: The NPS should set a user capacity based on visitor use levels from 1987 when the river was first designated as wild and scenic.

> *The Wild and Scenic Rivers Act stipulates that a CMP "shall address . . . user capacities . . . to achieve the purposes of this chapter." 16 U.S.C. § 1274(d)(1). WSRA's regulations define user capacity as "the quantity of recreation use which an area can sustain without adverse impact on the Outstandingly*

Remarkable Values and freeflowing character of the River area, the quality of recreation experience, and public health and safety." 47 Fed. Reg. at 39455. NPS is thus required to place specific and measurable restrictions on the use of the River. Friends of Yosemite v. Norton, 348 F.3d 789, 796 (9th Cir. 2003). By failing to propose any user capacity thresholds in the past, NPS violated the plain language of the Act. All of the alternatives examined in the DCMP/EIS use currently existing conditions and user capacities as a baseline. For example, for the Yosemite Valley, none of the alternatives decrease overnight camping capacity below current conditions. DCMP/EIS 6.27. In the Merced Gorge, there are no alternatives presented aside from currently existing management capacities. DCMP/EIS 6.34. But NPS has a duty to consider visitor levels in 1987, the baseline year. Its failure to do so undermines achievement of WSRA's objectives to restore and enhance the River's ORVs. ... NPS should not base the River's capacity solely on existing use levels. Just because the River has handled a certain number of visitors in the past does not mean that the River can continue to do so in the future without adversely affecting the River's ORVs. The NAA [No Action Alternative] does not, in fact, analyze existing and projected adverse impacts to ORVs from the perspective of the 1987 baseline. DCMP/EIS 8.13-8.52. Nor is there any discussion of whether existing user capacities are in fact adequate to protect ORVs. Without such analysis, it is not possible to determine whether reductions below current levels would protect ORVs better than the preferred alternative, which would increase user capacities. NPS should not merely assume that historical capacities are adequate to insure protection of ORVs.

(Civic Groups; Correspondence #2945)

Response: The NPS is required to address visitor capacity by describing an actual level of visitor use that will not adversely affect river values. The NPS did not assume that use levels from any given year were protective of river values. Rather, user capacities were developed and refined throughout the planning process as described in Chapter 6 and Appendix S. Capacities were informed by an understanding of restoration needs, the types and locations of facilities that could remain in the corridor, transportation system needs and limitations, and an understanding of how use levels affect social conditions and the quality of the recreational experience in the river corridor.

Using these factors, the Plan presents a range of alternatives, each with different visitor use levels. On the low end of the spectrum, Alternatives 2 and 3 would substantially reduce visitor use levels in the river corridor. For example, maximum daily visitation for Yosemite Valley under Alternative 2 for Yosemite Valley would fall to 13,900, as compared to daily visitation for Yosemite Valley of 20,900 under the No Action Alternative. The estimated maximum daily visitation for Yosemite Valley in 1987 was approximately 21,000 people per day, which is between the visitation levels proposed in Alternatives 5 and 6. Thus, the range of alternatives in the MRP does represent a range that includes visitation levels consistent with those at the time of designation within them. Alternatives 2, 3, 4 and potentially 5 all represent a reduction in daily use from the time of designation.

Concern 217: The NPS should set a user capacity that addresses past and ongoing degradation, as directed by the Ninth Circuit Court of Appeals, not based on peak visitation levels and capacity-increasing infrastructure.

The Draft MRP does not explain how the user capacities address both past and ongoing degradation, as required by WSRA and the Ninth Circuit. Where does the MRP consider, disclose and evaluate the link between user capacities and protecting against ongoing degradation and remediating some past degradation? The Ninth Circuit has previously found that, "[s]etting interim limits to current capacity limits does not address the problem of past degradation." (P. 1035) Yet, it appears that Alternative 5 sets user capacities to allow for peak visitation levels occurring today and intends to increase capacity through new infrastructure.

(Unaffiliated Individual; Correspondence #8330)

Response: As explained in response to Concern ID 108, monitoring of the ORV indicators and standards indicates that the river's ORVs are not in a degraded condition. The plan does however include actions to address management concerns related to particular ORVs. These actions are identified in Chapter 5 and are incorporated into each action alternative. Our response to Concern ID 191 explains the process that NPS used to establish the user capacity decisions included in the plan. Capacities are not based on peak visitation levels. Chapter 7 analyzes each major facility in the river corridor for retention, removal or relocation. The facilities that are retained in each of the action alternatives are consistent with WSRA and the Secretarial Guidelines.

Concern 218: The NPS should increase park entrance fees to fund needed maintenance and staffing.

> *Park fees and cost of passes should be increased to better meet the requirements of maintenance and staffing.*
>
> (Individual; Correspondence #60)

Response: The Merced River Plan / EIS is not the legal mechanism for establishing or changing the collection of or amount of recreational fees for Yosemite National Park. The 2004 Federal Lands Recreation Enhancement Act (FLREA) enabled the Secretary of the Interior to establish, modify, charge, and collect recreation fees at Federal recreational lands such as Yosemite. FLREA directs the Secretary to provide the public with opportunities to participate in the development of or changing of a recreation fee established under FLREA. A decision to change the entrance fee for Yosemite is outside the scope of the Merced River Plan.

Concern 219: The NPS should establish programs to incentivize visitation during less busy times.

> *Programs that will help distribute the peak visitation weekends by encouraging visitation during otherwise less busy weekends might be more beneficial than capping the number of visitors alone.*
>
> (Individual; Correspondence #60)

Response: The NPS is currently working in partnership with local and regional visitor centers and bureaus to distribute information to the public about when the park is busy. This public information campaign also recommends better times to visit the park when congestion is less likely. This information is available on the park's website, and is regularly updated based on best available information.

Concern 220: The NPS should not increase user capacity, as it exacerbates crowding which negatively impacts visitor experience.

> *The proposed changes in plans 5 and 6 would increase visitors and would make the valley more crowded and stress the environment even more than at present. I am not in favor of either of these plans.*
>
> (Individual; Correspondence #1021)
>
> *On the other hand we do not support the provision in Preferred Alternative 5 for an increase in overall visitor use during peak periods in the summer or the elimination of bicycle rentals, which provide a valuable alternative to private automobile transport within the park.*
>
> (Individual; Correspondence #1890)
>
> *Alternative 5 does not decrease the density of visitors at some of the highest use locations in the valley, and actually manages for a twofold increase over current conditions in density at 2 sites (shore use at high and medium use locations in the East Valley, 5-132). The Park is actually managing for an increase in crowding on the SHORES of the river, locations that are already heavily impacted and are more sensitive than upland locations with less crowding. The level of crowding on beaches and shores of the*

Merced are already at a level that is causing adverse impacts. A problem associated with high use on the shores is the leap-frog effect of visitors who are seeking a more private or remote place to enjoy the river, who venture further and further from high use areas, spreading the impact up and down the shores of the river.

(Individual; Correspondence #2211)

It is a huge assumption that the Preferred Alternative's proposed actions are actually going to change how crowded people feel. The Park conducts visitor use studies that reveal people are already feeling crowded. Any assumption of the visitor experience being changed or enhanced because of the anti-crowding and anti-congestion actions the Park proposes are just that-assumptions. Visitors have been feeling crowded in Yosemite Valley for decades, and a Plan that increases the number of people in the Valley is sure to leave visitors feeling the same- over-crowded. ...The QUALITY of the visitor experience will only be improved to the degree that eventual traffic flow management actions and more parking spaces eases driving conflicts. But the Preferred Alternative would not improve, and in fact would exacerbate, negative visitor experience problems caused by far too many people at destinations, along the river corridor, on trails, etc.

(Individual; Correspondence #2211)

Perhaps the biggest concern with the Merced River Plan is with what it does not really address. It appears that NPS is ignoring one of the primary concerns articulated in Friends of Yosemite v. Kempthorne, User Capacity. Increasing lodging, camping, and day use parking, does nothing to address the User Capacity concerns and only exacerbates the current problems experienced in the Valley due to chronic overcrowding during peak season.

(Individual; Correspondence #2602)

I also oppose any increase in maximum day-use capacity which could make crowding worse.

(Not Specified; Correspondence #11717)

Response: The action alternatives included in the plan present a range of capacities that that would achieve the mandates of the Wild and Scenic Rivers Act but in different ways. Alternative 5 (Preferred) would reduce the maximum number of people at one time in Yosemite Valley, and also includes other actions (some common to Alternatives 2–6, others unique to the Alternative 5) that manage visitor use to improve the quality of visitor experiences. As explained in "River Values and their Management" (Chapter 5) ORV 20, visitor densities at key attraction sites are the indicator for the condition of the Recreational ORV in Segment 2. Providing a quality recreation experience requires managers not only to understand the impact of use on natural and cultural resources, but also understand and manage for quality social conditions. Additionally, the management standard for the Recreational ORV in Yosemite Valley has been designed to protect the visitor experience at a variety of attraction sites around the Valley. To set user capacities commensurate with the site-level standards discussed above, the relationship between arrivals at the site and crowding at the locations where visitors were surveyed was established. Additional research was initiated in 2007 and again in 2013 to accomplish this goal (please see Appendix S for a full discussion of this analysis). Management strategies have been developed for each alternative to ensure that user capacities are not exceeded and a high quality recreation experience is provided. "User Capacity and Visitor Use Management" (Chapter 6) outlines these strategies for each segment.

Concern 221: The NPS should improve and expand infrastructure to allow for future increases in visitation.

The Ninth Circuit Court required that Park planners develop a specific number for user capacity in Yosemite Valley. National Park policy in the past has relied on Visitor Experience, Resource Protection (VERP) to monitor visitor use and capacity. We understand that Park planners must follow the law, but proposed user capacity of approximately 19,000 in the Preferred Alternative does not allow for any

growth in visitation. Visitor access will soon be restricted with a day-use reservation system when numbers exceed the user capacity adopted in this Alternative. Again, by adding parking and campsites above and beyond the additions in Alternative 5 will allow higher user capacity numbers and permit some growth.

(Individual; Correspondence #1984)

I particularly oppose any plan that gives the Valley less ability to accommodate visitors than it has currently. The lottery aspect of Half Dome hiking permits strikes me as a rather poor model for use of the "people's park." We should not have every Yosemite experience be as rare as a Bracebridge Dinner ticket. As the Report admits, the "carrying capacity" of the Valley depends on the infrastructure in place to accommodate visitors. Yosemite is, and will remain, popular. We need to acknowledge that fact and provide the infrastructure needed to accommodate that demand.

(Individual; Correspondence #2168)

Response: While the NPS did explore a range of alternatives that included large scale expanded infrastructure during the planning process, it was determined that a level of visitation greater than that envisioned for Alternative 6 would require major transportation and infrastructure changes. In order to preserve reasonable transportation conditions, such high-use scenarios would require elements such as constructing additional lanes for Valley roads, constructing more than three traffic roundabouts and two pedestrian underpasses at Valley intersections, and developing a new large-scale parking area in the West Valley. These higher-use scenarios also compromised several restoration objectives, and would have required capacity management at the attraction site scale (e.g., limiting the number of people that can visit places such as Yosemite Falls and Bridalveil Fall at one time) in order to provide acceptable social conditions. Initial review of these higher-use scenarios demonstrated that use levels that allowed for significant growth in visitation would require unacceptable levels of development or capacity management that was cost-prohibitive or infeasible.

Concern 222: The NPS should manage user capacity by installing an entrance station at El Capitan Crossover, counting the cars entering the valley, and redirecting traffic out of the valley once capacity is reached.

I feel the best method to limit capacity along the Merced River is to install a Valley entrance station at the El Cap crossover, and count the number of cars entering the valley. When capacity is reached, cars must take the crossover and leave the valley. A car counter can be installed on Northside Drive to monitor the number of vehicles leaving the valley. This would be much more cost effective than the current Merced River Plan Alternatives.

(Individual; Correspondence #560)

Response: Yosemite already occasionally manages "vehicle at one time" (VAOT) levels in East Valley, but only during short periods when day use parking is fully occupied and near-gridlock traffic conditions are imminent. NPS Law Enforcement Rangers implement what is colloquially known as “the shunt” at El Capitan Cross-over. These “day-use traffic diversions” are made at the park operations level, on an ad hoc basis, but in the future, as suggested by this concern statement, this Traffic Diversion System will be used to manage the “At One Time” capacity of East Yosemite Valley. As use has continued to rise in recent years, the traffic diversion has been implemented with increasing frequency (approaching 20% of summer days in 2011), but is used infrequently during less busy years like 2012. The NPS can continue to implement this traffic diversion without building another entrance station or kiosk in West Yosemite Valley. Additionally, traffic counters are already installed on inbound and outbound lanes for East Yosemite Valley to monitor traffic volumes and ensure that VAOT capacity is not exceeded. For additional information on

how the MRP will manage capacities, please see the segment discussions in "User Capacity and Visitor Use Management" (Chapter 6).

Concern 223: The NPS should provide additional detail in the plan for future visitor capacity management system, including the mechanics of the allocation system, in order to adequately address impacts.

> *The DEIS contains so little information about how a future visitor use capacity management system would actually function that it is very difficult to offer substantive comments.*
>
> *How would reservations be allocated between overnight visitors in gateway communities and the residents of gateway communities? Absent a clear understanding of the mechanics of the future system, it seems as though gateway lodging operators would suspect that their guests would experience an increasingly difficult time securing access to the east end of Yosemite Valley as the competition grows between visitors and those living within a reasonable day-use distance from Yosemite Valley.*
>
> (Individual; Correspondence #2133)

Response: "User Capacity and Visitor Use Management" (Chapter 6) has been updated with additional information about how the Merced River Plan will implement a user capacity management system for Yosemite Valley. Details of any parking allocation systems are not fully developed. Only the El Capitan Traffic Diversion System (aka "the shunt") is likely to be implemented in the immediate future. Management actions that relate to the design and implementation of a day-use allocation system could be applied in the future if the El Capitan Traffic Diversion System is no long sufficient to manage visitor use and capacity. These actions are outlined in Chapter 6 and provided in detail in Appendix S.

Concern 224: The NPS should develop user capacity limits based on protecting river values, rather than setting capacities based on existing and planned infrastructure.

> *We believe that it is necessary for the Park planning staff and the eventual final decision-maker for the Merced Plan to consider past court direction related to "degradation" within Wild and Scenic River corridors and to consider strict mandates to adopt user capacity levels that truly protect outstandingly remarkable resources in all of their complexities.*
>
> (Individual; Correspondence #2207)
>
> *That [2008 U.S. Court of Appeals] ruling includes: "Moreover, the interim limits are based on current capacity limits and NPS has not shown that such limits protect and enhance the Merced's ORVs." ... The ruling also includes criticism of the NPS's interim limits because they "are simply the current physical capacity of the facilities in Yosemite Valley." Yet that is almost exactly what the Park is now proposing for yet another time. In the current Preferred Alternative, the Park proposes a user capacity level that planning staff has openly told CSERC is based on attempting to maintain current capacity limits tied to peak period visitation use over recent years, but to improve traffic flow so as to reduce traffic congestion. Park staff has been open about the goal to meet the recent years' level of user demand. That is not what user capacity should be based upon as stated in the Court ruling. Park staff has told me that the user capacity level is based on what the added parking spaces, added campsites, more or less status quo lodging, and added day use will total to provide. THAT IS SETTING A USER CAPACITY ON WHAT FACILITIES AND PARKING SPACES CAN HANDLE, NOT ON WHAT IS THE PROPER LIMIT TO SET ON USE SO AS TO PROTECT AND ENHANCE RESOURCES IN THE RIVER CORRIDOR FOR CURRENT AND FUTURE GENERATIONS. - CSERC urges that the FEIS clearly acknowledge not only the deficiency of failing to meet the WSRA intent, but in failing to respond to the 2008 Ruling that underscores the need to go beyond an assessment of what the physical limitation of facilities may be, and to instead set a user capacity on what protects and enhances the resources.*
>
> (Individual; Correspondence #2210)

> *User capacity is inappropriately based on the amount of people that can be parked, lodged, or housed in the Valley, while giving too little consideration to crowding outside of the road and parking system. The July 2012 study, which has the most recent visitor use data, shows that all transportation related activities are considered greatly over capacity (9-808). While the actions proposed in alternative 5 address crowding and congestion in parking lots and on roads, the DEIS neglects to assess the impacts of the actual quantity of people negatively affecting a visitor's experiences. The same referenced study shows hiking and biking are considered to be over capacity because of crowding levels expressed by visitors. Increasing the quantity of people in the Valley, regardless of how their vehicles are managed, ultimately still increases the pressure on already stressed resources.*
>
> (Individual; Correspondence #2211)
>
> *Suggest you develop user capacities that are based on the impact of such capacities on river values and resources, not on existing and planned infrastructure.*
>
> (Individual; Correspondence #2273)

Response: User capacities were developed and refined throughout the planning process as described in Chapter 6 and Appendix S. Because the protection and enhancement of river values is a primary goal of this plan, the planning process began by identifying measureable indicators for the quality of each river value. To determine whether the kinds and amounts of use currently allowed in the river corridor were adversely impacting river values, each river value was assessed and compared to its desired condition. None were found to be adversely impacted or degraded. Some areas of concentrated use were identified for targeted restoration, and the most significant actions were included in the action alternatives. User capacities were informed by an understanding of restoration needs, the types and locations of facilities that could remain in the corridor, transportation system needs and limitations, and an understanding of how use levels affect social conditions and the quality of the recreational experience in the river corridor. The user capacities proposed in all action alternatives have been evaluated and are protective of river values. For more information on how the capacity program was developed, please see "User Capacity and Visitor Use Management" (Chapter 6), Part II and Appendix S.

Concern 225: The NPS should not reduce visitor capacity as this will require a future reservation system that could favor more affluent visitors.

> *The concept of reducing visitor capacity is also ridiculous. This will eventually lead to a situation in which visitors will need to register in advance of their arrival. Such a system favors the affluent and restricts public access to our public lands.*
>
> (Individual; Correspondence #2250)

Response: The law requires the MRP to address user capacities, and it is clear that demand for access to Yosemite Valley can create impacts that reach unacceptable levels unless visitor use is limited. Overnight users are currently limited by reservation systems for camping and lodging, and vehicles entering East Yosemite Valley have been occasionally limited to prevent gridlock through traffic diversions for over 20 years. The MRP identifies acceptable conditions for ORVs, and shows how capacities will work in combination with other management actions to protect and enhance ORVs. In the lower use alternatives, demand will exceed capacities often enough to require a day-use reservation system (which is proposed for those alternatives). For higher use alternatives, including Alternative 5 (Preferred), a traffic diversion system is proposed to prevent visitor use from exceeding capacities during peak use periods on peak use days. The MRP formally identifies capacities based on research and transportation modeling to ensure that use levels do not exceed standards for the Recreational ORV. Should the NPS need to implement a day-use reservation system for East Yosemite Valley, this action would be carried out through a tiered compliance

process that would be subject to public review. This tiered compliance process would address issues of allocation, fees, and equity of access.

Concern 226: The NPS should not increase user capacity as it would exacerbate impacts to environmental resources.

> *We oppose an increase in overall visitor use in Yosemite Valley during peak periods in the summer as listed in Preferred Alternative 5.*
>
> *We believe Yosemite cannot handle more visitors without damaging natural resources and and impairing visitor experience.*
>
> (Individual; Correspondence #2070)
>
> *CSERC also asserts that the discussion of the Preferred Alternative in the DEIS fails to describe that the long-term health of the biological resources that are dependent upon the river corridor will be further jeopardized by the Preferred Alternative 's increased thresholds for visitation and recreational/commercial use.*
>
> (Individual; Correspondence #2210)

Response: Both during alternatives development and after the range of alternatives was refined, park recreation ecologists, social scientists, and user capacity experts evaluated the potential effects on river values of the various kinds and amounts of use proposed, and developed management actions that are included in the plan to ensure those values would remain protected. For example, biological conditions can be sensitive to an amount of use, in which case they may be a limiting factor in determining capacity. Most often, though, biological conditions are related to the type of use occurring and how it is managed rather than the amount of use. For instance, a trail crossing a sensitive meadow could be vulnerable to widening by pack stock more than by human foot traffic. In this situation, the type of use would affect the trail condition – and the associated meadow – more than the amount of use. Such a problem could be remedied through management action, such as building a trail that can withstand pack-stock use. In such cases, biological conditions are not the limiting factor for capacity, so the focus shifts to conditions that are more strongly related to numbers of users, such as transportation circulation, parking, or social conditions.

Concern 227: The NPS should consider further reducing the estimated user capacity threshold in order to protect and enhance river values.

> *Would like to see lower daily use limits from the estimated 19,000+.*
>
> (Individual; Correspondence #672)
>
> *NPS Should Consider a Reduced User Capacity Alternative ... A central goal of WSRA is not only to maintain and preserve ORVs but also to enhance and expand them. NPS has a duty to study alternatives that meet this goal*
>
> (Civic Group; Correspondence #2945)

Response: The MRP Alternatives provide a wide range of user capacities as required by NEPA and described in "User Capacity and Visitor Use Management" (Chapter 6). These capacities range from ~12,500 people at one time to ~20,000 people at one time. Within this range, Alternatives 2–6 were designed to ensure the protection of river values. Not all ORVs are as sensitive to amounts of use as they are to types of use (see response to Concern 201 for more details). Higher use alternatives (Alternatives 5 and 6) have higher levels of infrastructure and more intensive management to handle the use without unacceptable impacts, while providing recreation opportunities for more visitors. Lower use alternatives (Alternatives 2, 3, and 4) require less infrastructure and management, and offer more opportunities for restoration, but

provide fewer recreation opportunities visitors. For more information on how each type of ORV interacts with capacity decisions please see Chapter 6.

Concern 228: The NPS should provide additional clarity and consistency regarding the quantitative analysis of user capacity.

> *Why is it that a Plan that is supposed to address User Capacity using quantifiable measures of use cannot seem to gets its numbers straight?? There appears to be little consistency across documents as to what actually exists on the ground, casting a significant shadow of doubt as to whether any of the numbers in the MRP (or any other documents) are accurate or just someone's best guess. ... where did all these numbers and mis-numbers come from and why have they been included in the Plan absent any verification or cross-checking?? Since quantifiable measures of use are the crux of this Plan, it is very difficult for this reviewer to have any confidence in any of the numbers presented'especially since decisions affecting future participation in a variety of recreation activities is based on these numbers.*
>
> (Individual; Correspondence #1618)
>
> *The Preferred Alternative intends to increase the number of people in the Valley over baseline conditions, which are already higher than they would have been if the Park had completed a legal plan in a timely manner. CSERC understands that the baseline conditions are integral to the plan and there is no point arguing over them now since they cannot be changed. However, CSERC still urges the Park to consider that, if the appropriate baseline conditions had been used from the time when the Park initially began the Merced River Plan process, the increase in user capacity would be measurably more significant. ... visitors felt there were too many people two decades ago when there were 600,000 fewer people visiting the Park annually. ... WSRA requires a user capacity that is protective of river values, not one that "accommodates peak levels similar to those observed in recent years."*
>
> (Individual; Correspondence #2211)
>
> *NPS cannot rely on an unfounded assumption that existing use restrictions, land management zoning, and other current standards and conditions are sufficient to protect the River and River corridor. The Ninth Circuit has disapproved NPS's prior attempts at river management because they failed to provide adequate standards and indicators of harm. Friends of Yosemite v. Norton, 348 F.3d 789, 796 (9th Cir. 2003); Friends of Yosemite Valley v. Scarlett, 439 F.Supp.2d 1074, 1078 (E.D.Cal. 2006). Such an approach is not adequate under the WSRA because it "fails to yield any actual measure of user capacities." Id. NPS must provide data and analysis that demonstrate that its adopted visitor caps will in fact adequately protect ORVs. "[S]tandards set at baseline or existing conditions may potentially lead to the perpetuation of unacceptable conditions."*
>
> (Civic Group; Correspondence #2945)

Response: The DEIS included capacities and related use levels for segments, specific locations within segments, specific times, and specific types of use. These capacities, in turn, were based on specific standards and sometimes complex use-impact relationships. The FEIS includes substantially revised chapters on ORVs, standards, and capacities to help clarify the quantitative analysis of user capacity. Additionally, a new technical appendix (Appendix S: Visitor Use and User Capacity Technical Report) explains the conceptual basis for capacities and the processes and methodologies used to develop them.

Concern 229: The NPS should utilize the language from the 1982 Secretarial Guidelines to define user capacity and as the foundation of the user capacity management program.

> *It is acknowledged that User Capacity is central to a management plan for the River. How User Capacity is actually defined sets the stage for how it will be interpreted and implemented across the alternatives. Cited throughout the DEIS is adherence to the '82 Federal Register Guidelines which state a very specific definition of User Capacity:*
>
> - *"the quantity of recreation use which an area can sustain without adverse impact*

- *on the outstandingly remarkable values and free-flowing character of the river area,*
- *the quality of recreation experience, and*
- *public health and safety.*"

Yet nowhere does that definition appear in the Merced River Plan DEIS. Instead the Plan's Glossary offers its own interpretation:

> "*as it applies to parks, user capacity is the type and level of use that can be accommodated while sustaining the desired resource and social conditions based on the purpose and objectives of a park unit.*"

How can a 2500+ page Plan be developed without adhering to the '82 Federal Register Guidelines legally adopted definition of User Capacity as the foundation?? When published in the Federal Register, the final rules promulgated by a federal agency (in this case the Departments of Interior and Agriculture) are ultimately codified in the Code of Federal Regulations (CFR). Ignoring the guidance provided by this definition has resulted in a Plan and a planning framework that lacks context. If planners were going to adhere to the '82 Guidelines as a policy document, they would adhere to the entire document'not pick and choose those sections/sentences they believe offer greatest flexibility. By going with a more "mushy" definition (i.e., "desired resource and social conditions based on the purpose and objectives of a park unit"), planning decisions become the result of how the Park Service wishes to interpret the wording, as opposed to being held to the standard.

(Individual; Correspondence #1617)

Response: "User Capacity and Visitor Use Management" (Chapter 6) has been updated with additional information about how the Merced River Plan adheres to the Secretarial Guidelines. The references in this chapter have also been updated to ensure the accuracy of definitions used from all guiding policy documents (including, but not limited to, the Secretarial Guidelines).

Concern 230: The NPS should revise the EIS to more clearly describe the measurement standards and triggers for managing visitation to ensure user capacity is not exceeded.

Our ... concern is the way the plan addresses user capacities and the methods proposed for measuring, monitoring and managing visitation to ensure user capacities are not exceeded. The measurement standards described in the DEIS are incomplete and therefore incomprehensible...The proposed management triggers are also poorly defined and would only very slowly and indirectly limit visitation to levels consistent with the user capacity – one of the principal requirements of the Settlement Agreement.

(Individual; Correspondence #8330)

... sections of the Draft MRP describing the management standards used to define and monitor visitor densities are woefully incomplete and incomprehensible. The Management Triggers defined in the Draft MRP are also poorly defined and would at best lead to very slow and indirect control of visitation rates in the Valley. We feel that the basic science is available to the NPS after years of study and millions of dollars spent. We would therefore strongly suggest that the NPS use this science to clearly define Management Standards and Triggers that can be understood by the public and implemented in a way that effectively controls visitation to Yosemite Valley and keeps use below capacities that are set to protect the river, its ORVs, and the recreational experience and public safety of its visitors.

(Individual; Correspondence #8330)

Where in the plan is an analysis to show that if user capacity is 19,900 people per day in East Yosemite Valley, the density indicators in Table 5-38 will not be exceeded?

(Individual; Correspondence #8330)

Response: The NPS has revised the document to include additional information on how visitation will be managed for Yosemite Valley to ensure that capacities are not exceeded. Because over 80%of all current

visitors arrive by private vehicle, and there are stable estimates of the number of people per vehicle, managing Vehicles At One Time (VAOT) is an efficient tool for managing the largest portion of day use.

For Alternatives 2, 3, and 4day use demand already demonstrably exceeds capacities and would require systems that keep use from exceeding those levels. For Alternatives 5 and 6, day use demand is currently near (or could soon exceed) defined capacities on several days each summer and may also need active management to enforce capacities. Limiting VAOT at specific parking areas (e.g., the larger day use lots) and at the entrance to East Valley (near the El Capitan / Southside Drive junction) is one option described in the plan (See "User Capacity and Visitor Use Management" [Chapter 6] and "Visitor Use and User Capacity Technical Report" [Appendix S]). In the *Final Merced River Plan Final/EIS*, the discussion of the steps that will be used to ensure that capacities for Yosemite Valley are not exceeded can be found in Chapter 6. Please see this chapter for a more thorough discussion.

Concern 231: The NPS should not include occupants of administrative campsites in its overnight camping capacity.

> *For purposes of determining the total overnight capacity of all campsites, the Plan should assign administrative sites to the category of employee housing, not visitor accommodations. Occupants of administrative campsites, such as Yellow Pine, are essentially temporary (unpaid) employees during their stay, and the quantity of these sites is significant. There are currently 4 group and 25 individual sites in administrative use,13 with a total capacity of 270 people, or 7% of the total overnight capacity of 4,032 visitors assigned to camping under the Preferred Alternative.14 The Plan itself suggests this designation in regard to the 4 administrative group sites at Yellow Pine, which are noted as employee housing in the text of the Preferred Alternative.15 We believe all administrative sites should be included in the employee accommodation category to provide a more accurate allocation of campsites to visitor accommodations.*
>
> (Individual; Correspondence #3690)

Response: While the park does maintain a variable number of "administrative campsites," these sites are included with visitor sites (and not employee housing) for two major reasons. The first is that there is nothing distinctive about the majority of these sites that separates them from visitor sites, and at any point in time they could be made publicly available. Based on the relative demand for administrative use, the number of sites that are set aside from the inventory of publicly booked sites varies. Second, these sites are not used for the extended stays that are associated with employee housing. Typically, these sites are occupied by visitors who are volunteering to provide administrative functions for the park (such as restoration projects or education programs) and when those administrative activities are not occurring, such as in the evening, these volunteers are generally interacting with the park in a similar way as other visitors. Thus, while the occupants of these "administrative campsites" are providing some level of administrative function for the park, their use patterns and activities are more akin to visitors than residents and employees and are therefore categorized as such.

Concern 232: The NPS should clarify whether employees are part of the user capacities and daily visitations for Yosemite Valley.

> *When Alternative 5 says it will "[a]ccommodate approximately 19,900 visitors per day in E. Yosemite Valley," is that a user capacity for E. Yosemite Valley? (P. 8-231) The plan does not make this clear. To confuse matters, the summary of user capacities for all of Yosemite Valley, East and West Valley segments, is listed as 18,151 for day, overnight and administrative use. Are administrative staff/employees considered visitors under the language above? It would violate WSRA to adopt a plan that set a daily user capacity of 18,151 people for two river segments, but in fact accommodated 19,900 visitors per day in just one segment of the river. ...The plan claims that the segment classifications in*

chapter 3 "define the locations where capacities apply." (P. 6-1) However, it does not appear that any specific user capacities apply to the Scenic West Valley segment (P. 8-232).

(Individual; Correspondence #8330)

Response: User capacities identify the maximum number of people that can be received in specific segments and time periods in different alternatives. These capacities are generally based on how much use can occur at one time without causing conditions to reach unacceptable levels, and they consider the combined effects of overnight use and day use during peak periods. Employees of YNP and park partners are included in these user capacity calculations for all segments. Visitation estimates are the expected daily use levels derived from specific capacities in an alternative. The plan reports the specific capacities and subsequent visitation estimates so readers can fully understand how different capacity decisions result in different visitation levels. Visitation estimates do not include employees, but rather are a predicted level of visitors that could be accommodated over a 24-hour period.

Concern 233: The NPS should vary alternatives to provide for different levels of enhancement of ORVs, not just varying types of recreational experiences.

The plan also states that "User capacities were adjusted to reflect the experiences envisioned within each alternative," purportedly while protecting river values (ES, p.9). This indicates that the varying user capacity alternatives were adjusted based on the Recreation ORV or "recreational experience" as mentioned in the 1982 Guidelines, but not based on the duty to protect or enhance other ORVs. The varying alternatives should provide for different levels of enhancement of river ORVs, not just varying types of recreational experiences. If this cannot be demonstrated, then NPS has not properly addressed user capacities.

(Individual; Correspondence #8330)

Response: The range of alternatives does provide for different levels of enhancement of outstandingly remarkable values. For example, Alternative 2 proposes to eliminate many structures within the 100-year floodplain and ecologically restore 342 acres, primarily to enhance the Biological ORV 1. Conversely, Alternative 4 substantially increases camping, part of the Recreation ORV while providing for 225 acres of restoration. While both alternatives provide for restoration necessary to protect river values, they vary in terms of how much enhancement of river values can be accommodated when balanced with different levels of visitor use.

Concern 234: The NPS should revise the Comprehensive River Value Analysis to include additional detail about how an increase in PAOT and visitation from existing conditions will reduce crowding and congestion and enhance the Recreation ORV.

The Comprehensive River Value Analysis by Alternative in Chapter 8 summarizes impacts to ORVs from different management decisions. However, the unit, location and timing of user capacities do not appear to be fully evaluated. Instead, the 19,900-visitation level for Alternative 5 is discussed. ... For instance, with respect to the Recreation ORV, the Draft MRP indicates that "this managed change in visitation" use level resulting from user capacities "...would reduce crowding and congestion thereby enhancing the Recreation ORV on a segment wide level." (P. 8-444) However, the visitation level for Alternative 5 is in fact higher than current use levels. Therefore, NPS must explain how an increase in peak day-use visitation is going to reduce crowding and congestion and enhance the Recreation ORV.

(Individual; Correspondence #8330)

Response: Alternative 5 (Preferred) decreases capacity from the No Action Alternative (or existing condition) on the highest use days. When setting capacities for a given alternative, four major analyses inform NPS decision making. These included the ecological and restoration analysis, facilities and services

analysis, social conditions analysis and transportation analysis. Through these analyses, the NPS ensures that all alternative capacities would protect and enhance river values as well as enhance the visitor experience. Additional information on how capacities are related to and help protect River Values can be found in Chapter 6- Segment 2 under the section "Relationship of User Capacities to River Values and the Recreation Experience".

Concern 235: The NPS should manage user capacity for the Merced River Corridor as a function of the number of visitors who enter the park at entrance stations.

> *Rather than using assumptions about visitation levels, NPS could simply count people entering the park at different entrance stations. Under NEPA, when the data are readily available, NPS is required to collect them.*
>
> (Individual; Correspondence #8330)

Response: While Yosemite National Park does collect entrance station data, using this metric to mange capacity would be less accurate than measuring capacity using the traffic counters specifically designed to measure traffic for Yosemite Valley. Because capacity is managed for "at one time" levels, it is important to have a measure of capacity that is accurate and proximal to the area of interest. Travel patterns of visitors entering the park vary, and the river corridor is not the destination of all visitors who enter the park. Therefore, it would be less accurate to use entrance station data to "predict" how many vehicles enter the Yosemite Valley than to measure it directly using traffic counters. However, entrance gates are an ideal place to communicate to visitors that an area of the park may be busy. YNP is working to develop communication networks to disseminate this information to visitors both at the gates and in gateway communities.

Concern 236: The NPS should use PAOT and PPV as the metrics for monitoring and managing user capacities and the Recreation ORV, rather than person densities.

> *For example, Page 5-132, et seq., and Table 5-38 of the Draft MRP describe the monitoring of visitor densities to protect the Recreation ORV at specific recreation sites throughout the river area. They also describe the standard indicators for protecting the Recreation ORV in terms of square feet per person at different locations.*
>
> *During the various workshops MERG attended that addressed user-capacity issues relevant to the MRP, the metrics of interest for measuring Visitor Density were Persons At One Time (PAOT) for viewing areas and People Per View (PPV) for trails. The introductory remarks on User Capacity in the DEIS also mention PAOT as the metric of interest.*
>
> *PAOT and PPV are useful and appropriate metrics in that they provide information about how visitors react to various numbers of other people at a particular site or point on a trail. At a given time, there may be 10,000 people in the park, but a given visitor is really only aware of the say, 50 to 100 people with which he/she is sharing the Lower Yosemite Fall viewing area. NPS has conducted public surveys in which people described their feelings about crowding at various view sites and trails in terms of PAOT and suggested preferred levels, acceptable levels and levels that would require management action to reduce crowding. It is our understanding that such surveys formed the basis for the science behind the user capacity studies, and would be the basis for triggering management actions to assure that the visitor experience, an Outstandingly Remarkable Value (ORV) of the Merced River, is protected and enhanced - a legal requirement that the MRP must address.*
>
> (Individual; Correspondence #8330)

Response: Visitor or person densities and PAOT/PPV are essentially measuring the same thing; they are just expressed differently. PAOT and PPV are counts of the number of people in a fixed area at a given point in time, but the area is not specified. Visitor density is a more specific measure because it explicitly accounts

for the size area in which people are counted and includes it in the metric as number of square feet per person (i.e., the square footage of the area is divided by PAOT). Additional language to further describe and clarify the visitor density concept has been added to the ORV 20 description in Chapter 5.

Concern 237: The NPS should define the physical parameters—including square footage—of all viewing areas, trails, and shore use areas used in monitoring the Recreation ORV.

> *Second, the physical parameters of the viewing areas, trails and shore use are not defined. For example, without knowing which viewing areas are referenced and the number of square feet that make up a viewing area, one cannot tell how many people might be accommodated at a particular site or along a trail or shoreline, even though the plan purports to address user capacities as persons at one time (PAOT). ... The defined size of viewing areas or shoreline use will affect total capacity. ... The MRP should state whether these are site-specific user capacities or if they are merely indicators that additional management action is required. Is user capacity defined from the bottom up, or top down?*
>
> (Individual; Correspondence #8330)

Response: The area of the viewing platforms, trail, and representative beach has been measured and the PAOT converted to a visitor density (square feet per person). The calculations are presented in the discussion of ORV 20 in Chapter 5.

Concern 238: The NPS should clarify the monitoring protocol for the VAOT indicator and clearly state the time-line for taking management actions during implementation of the plan.

> *the supporting text is not consistent with information in table 5-37 ... After three years of initial monitoring, it would take place every three years to detect change ... Does the NPS intend to adjust the parking supply as a function of experience during the three-year implementation period or do they only intend to monitor for the purpose of establishing a baseline? If the latter is true, it would take 9 years of monitoring after the initial 3 years of establishing a baseline before any action would be taken.*
>
> (Individual; Correspondence #8330)

Response: The Recreation ORV in Yosemite Valley no longer has an indicator for vehicles at one time (VAOT) as park management determined that it was more appropriate to address VAOT as a part of the Yosemite Valley capacity management program. For additional information on how the VAOT is used as a part of the capacity management program, please see Chapter 6.

Concern 239: The NPS should take proactive management action to ensure visitor use does not exceed the stated user capacity thresholds in the plan.

> *The management responses to visitor use that exceeds capacity are unreasonable and again inconsistent with WSRA and the Ninth Circuit's directive. ... The management response to exceedances of visitor density indicators from Table 5-38 is very similar to the old Visitor Experience and Resource Protection (VERP) program that the Ninth Circuit found to be reactionary, requiring a response only after degradation has already occurred and thus violative of WSRA.*
>
> (Individual; Correspondence #8330)

Response: The MRP takes proactive measures to manage capacities in Alternatives 2-6, either through segment-wide or site-specific management actions. In all action alternatives, accumulated vehicles are monitored to ensure that capacity in Yosemite Valley is not exceeded at any one point in time. For additional information on the User Capacity Management program in the Merced River Plan please see Chapter 6.

Park Administration

Land Use and Facilities

Concern 240: The NPS should consider developing areas for camping, parking, and housing outside of the Merced River corridor.

> *Several times over the years we have noticed the little road that leads to Foresta and visited it a couple of times just out of interest. Just above the meadow I can envision 50-100 pull through camp sites for the larger RV's and trailers. I envison the buses used along Toulumne Road in the summer transporting people to Bridalveil Fall and around the Valley; a loop with only few stops that might also include the new parking lot in El Portal. If it is possible to use the land this way, it would help save the Valley Floor. The plans for Eagle Creek could be elminated or downsized, and the 36 RV sites planned for Upper Pines could be moved to Foresta and used for smaller parties or not used at all. Getting these bigger vehicles out of the Valley would keep traffic moving more effeciently, so it would be important to provide a regular schedule for transport. I wonder also if it might be a good alternative for some employee housing.*
>
> (Individual; Correspondence #2625)

Response: The purpose and need for this planning effort was to prepare a comprehensive management plan for the Merced River. As a result, the geographic focus of this plan was the Merced River Corridor and Yosemite Valley. Development of additional camping, housing and/or parking in areas such as Foresta is outside the scope of the Merced River Plan.

Concern 241: The NPS should re-evaluate the proposed relocation of concessions facilities to ensure the identified space can adequately support these functions and should provide the details of this analysis to demonstrate the feasibility of relocation.

> *The Volunteer Office near Yosemite Lodge will be removed but I can't find in the plan where it will be relocated. One of the gift shops that will be removed would be a good location or a location next to the Visitor Center. While I know that there are planned volunteer events and drop in events such as the HaPY program, my family would love to be able to stop by the Volunteer Office at other times and see if there is something that we could help with for a few hours. With the recent budget cuts, having the ability to do so would be an asset to the park.*
>
> (Individual; Correspondence #2460)
>
> *The plan is not complete enough to support the options presented for relocation of facilities. For instance, we are concerned that the identified locations for the garage, the concessioner General Office building and the Yosemite Lodge housekeeping/maintenance functions will not prove to be viable ...*
>
> (Business; Correspondence #2818)
>
> *The MRP also calls for the Concessioner Garage to be located at the site of the NPS Fire House and other NPS support operations. While we applaud moving this operation to a suitable back of house location, we are concerned that the identified space is not adequate to service and perform maintenance, washing and inspection of the vehicles used in the operation of the shuttle busses and other operations. The NPS's feasibility assessment indicated that there are a number of open items yet to be resolved, including fire suppression, noise, visual and traffic impacts on Village Drive, seismic and geotechnical requirements, economic impact of relocating existing NPS operations, constrained parking and that fleet expansion of the existing shuttle bus system cannot be accommodated at this site (for the concessioner garage).*
>
> (Business; Correspondence #2819)
>
> *At Yosemite Lodge the plan calls for the relocation of the Maintenance/Housekeeping building and functions to a location behind the Food Court. This building is in need of replacement, but the location*

for the new facility is also inside the river corridor ... Other uses are identified in the MRP to be added to this area, creating potential conflict for a service department that needs frequent pedestrian, cart and small vehicle access, as well as daily service from large vehicles providing out of the park laundry delivery.

(Business; Correspondence #2819)

Added to the space requirements is that the Bank Building (Art Activity Center) is scheduled for removal requiring the relocation of the daily cash control and currency management operations from there, creating the need for increased space.

(Business; Correspondence #2819)

Exhibit K identifies the mezzanine of the warehouse as the proposed location for the Concessioner General Office building. The General Office is about 10,000 square feet and the existing mezzanine is several hundred square feet. Even if the concessioner were able to consolidate and reduce space requirements from the existing condition, there is no way the identified space is adequate. ... we have learned that the expectation may be to build out the mezzanine over the entire warehouse, which would replicate the square footage requirements, but the location still possesses many obstacles.

(Business; Correspondence #2819)

Response: These comments include operational concerns that need not be evaluated in an environmental document, nor addressed by a river plan. Both the NPS and the concessioner will have to make the most of newly-assigned spaces and adapt to the limitations that are inherent to the facilities that will be provided. Shuttle buses and concessioner vehicles would be serviced in the larger industrial shop that is currently occupied by NPS Roads and Trails operations. The site drawing for Yosemite Lodge is conceptual and specific components, such as the housekeeping facility, will be designed in finer detail as more specific design and construction plans are produced.

Concern 242: The NPS should consider adding new facilities in other areas of the park to reduce the concentration of visitors in the Valley.

If you truly want to limit the impact to the Valley, you need to limit the day tripper numbers in the park and also decrease the lodging options and camping density within the Valley, by opening up other options in other parts of the park (Wawona, Hetch Hechie), not change the park so that there are fewer reasons for families to come in the first place. The proposed changes will make the park MORE of a "day tripper" destination for those who want a quick shuttle ride around the valley. It is the day trippers who are the density problem, not the lodgers/campers. People want more camping, but not if there isn't anything to do!

(Individual; Correspondence #48)

Response: The NPS has considered additional remote parking lots and employee housing in El Portal to reduce the concentration of people in East Yosemite Valley during peak congestion periods. The El Portal Remote Parking Area in Abbieville/Trailer Village will be services by an express shuttle to Yosemite Valley thereby having the potential to reduce the number of vehicles traveling on Valley roads by 300 per day (assuming the parking lot "turns-over" once a day). By relocating employee housing to El Portal, and increasing the availability of transit serving the area, these actions are anticipated to have positive effects on reducing vehicle congestion during peak use periods.

Concern 243: The NPS should remove and restore Yellow Pine Administrative Campground and other development in this segment because of the "scenic" classification of Segment 2B.

Further, reopening the Yellow Pines campground after the river was designated was never evaluated under NEPA and was counter to WSRA and should not be considered part of the baseline of the river area to be protected in segment 2b. ... Thus, rather than proposing to add even more development to the

West Valley, NPS should consider restoring the Yellow Pines campground area, which is within the floodplain, and apparently only used for occasional volunteer administrative use.

(Civic Group; Correspondence #8330)

Response: This volunteer campground is within the 100 year floodplain. Removing this campground and restoring the area to natural conditions was analyzed in Alternative 2. However, it was not identified by the NPS as a significant area to target for restoration. "Scenic" river segments, as defined by WSRA, retain their overall natural character but may have structures or concentrations of structures in short reaches of the total area and may be accessible in places by roads. WSRA allows for public use facilities, such as campgrounds, to be located within the river corridor if location outside the river corridor is infeasible, the facilities are necessary to provide for public use and/or protect the river resource, and the facilities do not have an adverse impact on the river values for which the river area was designated. "Development of Lands and Facilities" (Chapter 7), Table 7-1, evaluates all public use facilities within the river corridor for each of these criteria. According to this analysis, Yellow Pines Administrative Campground has no localized adverse effects on river values and is infeasible to relocate. The campground is necessary to provide overnight accommodations for volunteer groups that work on projects designed to protect Yosemite's resources, including protection of river values and resources.

Facilities—Reduce or Eliminate

Concern 244: The NPS should not reduce facilities or services within the park because doing so will eliminate jobs.

Eliminating commercial recreation also eliminates these jobs. In an economy as tough as it is today eliminating these jobs will detrimentally affect a significant number of people who do those jobs. Many of the jobs being lost are seasonal, and college and high school students do them because of their seasonality. This helps build the resume of the college students and offers opportunities for the high-schoolers who live in the valley to learn a good work ethic early. The stables is a skilled position that many employees do for many years, because they enjoy it, and these jobs are scarce in the United States. Many people who do jobs in recreation love the place they work as much as the job.

(Individual; Correspondence #95)

The removal of commercial recreational activities will also affect surrounding communities and the loss of jobs for many park employees.

(Individual; Correspondence #471)

Not to forget when you do this (remove commercial recreation) it will cause many people to lose their jobs working at one of the greatest national parks.

(Individual; Correspondence #1348)

Additionally, as a taxpayer, I do NOT support any moves that would eliminate jobs. Our CA economy is hurting and reducing jobs and then reducing tourism (via reduction in campsites/lodging) will only make the situation worse.

(Individual; Correspondence #2635)

Response: According to the socioeconomic impacts analysis discussion on in "Affected Environment and Environmental Consequences" (Chapter 9), the difference in jobs supported under Alternative 5 and Alternative 1 (presented in table 9-159 which shows a detailed breakout by industrial sector within the four-county regional economy), Alternative 5 would be essentially the same as Alternative 1 with regard to jobs in the region. Alternative 5 would support the equivalent of three fewer jobs than Alternative 1 and the Total

Job Creation in Four Counties would equal 6,540. In the context of total employment within the four-county region, the support for jobs resulting from Alternative 5 would be almost the same as from Alternative 1 (see table 9-160).

Concern 245: The NPS should reduce the proposed buildings and uses in the river corridor and justify construction of additional facilities based on how they will benefit the river ORVs and resources.

Reduce the number of buildings and uses now proposed for the river corridor.

(Individual; Correspondence #1739)

I hope that overall the Park Service is trying to reduce the human impact on the valley (reduce buildings, parking spaces, etc.). I'm bothered each time I take one of the high trails that overlooks the valley. The amount of "disturbance" visible from above is significant. In addition, you can always hear a fair bit of traffic noise which is very out of place.

(Individual; Correspondence #2116)

... instead of prioritizing the removal and relocation of facilities and uses out of Yosemite Valley and the river corridor, Park leaders with this latest plan have justified keeping almost all existing facilities and they have attempted to justify the construction of many more permanent structures in the wild and scenic corridor.

(Individual; Correspondence #2210)

Suggest that if you insist on proposing additional campsites, lodging units, and parking spaces, that you justify these additions in terms of how they will benefit river ORVS and resources. The truth is-they won't.... In its present form, the draft Merced River plan will not provide that protection.

(Individual; Correspondence #2273)

We feel very strongly that any return to a more pristine state in Yosemite, that is any reduction in man-made structures, especially superfluous ones, is a move in the right direction. We love to swim, ice skate, ride horses and bikes, but not in Yosemite. There are plenty of other places in the country we can do those things. In Yosemite we want to walk, hike, take pictures and just take in the glorious peace and beauty. We want quiet time, so rare these days, and the opportunity to reflect on nature.

(Individual; Correspondence #3320)

Response: In order to comply with WSRA and the U.S. Court of Appeals for the Ninth Circuit's 2008 opinion in Friends of Yosemite Valley v. Kempthorne, the NPS evaluated all existing and proposed major public-use facilities located within the river corridor using a rigorous three-step process. This process evaluated all facilities (including proposed facilities) to determine whether it would be: (1) feasible to relocate the facility outside the river corridor, (2) if infeasible to relocate, if the facility was necessary for public use and/or resource protection, and (3) if the facility is both infeasible to relocate and necessary for public use or resource protection, whether it can be maintained without adverse impacts to river values. Alternative 5 (Preferred,) would relocate or remove many buildings and structures from the river corridor, including the Concessioner General Office, the Concessioner Garage, the bulk fueling facility in El Portal, as well as numerous others. The facilities that would be retained under Alternative 5 (Preferred) are those that meet the requirements of WSRA.

Concern 246: The NPS should present a clear rationale for both increasing development within the river corridor and removing or relocated existing development within the river corridor.

We don't understand why there is inconsistent allowance given for the level of development within a river corridor with a result that appears arbitrary and confusing. For example the MRP calls for the construction of new employee housing within the river corridor at Huff, yet there are numerous other

examples of moving infrastructure outside the river corridor in the Yosemite Valley Recreational segment of the Merced.

... we question why new construction is permitted within the river corridors but retention of existing infrastructure so often is not.

(Business; Correspondence #2819)

... horseback rides in Tuolumne Meadows and Yosemite Valley are eliminated, yet they are called to increase in Wawona. All three stables are located in proximity to a wild and scenic river and we fail to understand the difference in treatment.

(Business; Correspondence #2819)

Response: As presented in "Development of Lands and Facilities" (Chapter 7), Table 7-1: Evaluation of Major Public-use Facilities within the River Corridor, each existing or proposed public use facility within the river corridor was evaluated in the context of: (1) how it was addressed in the 1980 Yosemite General Management Plan, (2) whether it is feasible to relocate outside the river corridor, (3) whether it is necessary for public use or protection of the resource, (4) its potential for local adverse effects to river value(s), and (5) what mitigation measures are required to protect river values. In some cases, existing public use facilities were not deemed essential for public use or resource protection and could feasibly be eliminated or relocated outside the river corridor. In other cases, it was not deemed feasible to eliminate or relocate these facilities—often because all suitable alternative locations are also located within the river corridor. Any new proposed development was deemed necessary in order to meet user capacity, public use, and resource protection goals as outlined under Alternative 5 (Preferred). New development will not adversely affect river values and will be designed in accordance with design guidelines that promote harmony between the built and natural environment.

Concern 247: The NPS should refine the methodology for measuring the impacts to the visitor experience based on the significance of the service rather than the number of people who use that service.

Chapter 9 introduces methodology to evaluate the intensity of visitor experience and recreation according to the following criteria: "Negligible impacts would not be detectable and would not have a discernible effect on visitor services. Where impacts are quantifiable, less than 2.5% of visitor services would be affected in a particular segment of the river corridor." Similar wording is used to describe "minor impact" (2.5% to 5%), "moderate impact" (5% to 10%) and "major impact" (greater than 10%). We believe that this methodology fails to capture the true intensity to a visitor experience. Using this standard, nearly all services and activities would result in a negligible to minor adverse impact to the visitor if they were to be removed one at a time. For instance, less than 1 .5% of visitors have dinner in the Mountain Room at Yosemite Lodge, 1.7% of visitors take a Valley Tour and we would anticipate that most NPS programs have far less use than that. ... What is not known is the value of the service to the visitors who use them ... For instance, in discussing YARTS ridership, the MRP quotes a summer 2007 visitor survey that found that "the YARTS bus service is very important to its riders" while noting that ridership was between 1.5% and 1.9% of park visitation. ... This reflects the value of the activity independent of the number of users. Activities cannot be judged solely on the basis of their individual participation or we would only be left with activities for a mass audience. The ice rink, for example, attracts about 13,000 skaters annually (individual paid skaters and annual pass-holders, who are only counted once in the paid tally), and we would expect that more than two to three times that number of people come to watch or enjoy others skating. This number is achieved over the 3-4 months that the rink is open and provides an incentive for people to come in winter ...

(Business; Correspondence #2818)

Response: The NPS recognizes that the services provided in the river corridor have significance for visitors who engage in recreation in Yosemite National Park. During alternatives development, facilities and services were considered based on the objectives for visitor experience, rather than solely on how many visitors participate in that activity or service. Park managers recognize that the particular "significance" of a given service varies widely from visitor to visitor, as each visitor brings a unique perspective on the value of the various facilities and services within the park. The Visitor Experience section of "Affected Environment and Environmental Consequences" (Chapter 9) objectively gauges the impact of a change in a given service by the number of people that would be affected by the change within a specific segment. This objective analysis allows for an equitable comparison across alternatives and actions. Once that impact is established, the significance of the change is measured, based upon the number of people that would be affected. This methodology directly accounts for the number of visitors whose access or experience would change under a given alternative.

Concern 248: The NPS should revise its "Affected Environment and Environmental Consequences" (Chapter 9) analysis to more accurately capture the impacts to visitor experience that will result from the proposed removal of commercial services in Yosemite Valley.

> *Chapter 9 summarizes the overall cumulative impact from alternative 5 in the following fashion on page 9-871: "The cumulative impacts of Alternative 5 management measures on visitor experience would generally be beneficial in Segments 1-8. Past and present visitor services improvements and upgrades would enhance visitor experience and reduce the existing stress on visitor facilities. Visitors would also benefit from past and present habitat and riverbank restoration and resource management projects and plans. As a result, the cumulative impact of Alternative 5 management measures, in light of past, present, and reasonably foreseeable future projects, would be Park-wide, long term, minor to moderate, and beneficial." It is not clear what stress on visitor facilities is being referred to, but we believe the stress will increase if there are fewer options available for the same number of visitors. We also question why this analysis did not mention the considerable changes in access to recreational opportunities long-enjoyed by Yosemite's visitors or the removal of many visitor services. This summary only focuses on facility upgrades and riverbank restoration as a measure to determine the cumulative effect on the visitor experience. We believe that a more thorough cumulative analysis would provide different conclusions.*
>
> (Business; Correspondence #2819)
>
> *We also found the analysis of the removal of these services in Chapter 9 to be particularly interesting. Regarding services such as the YTS garage, Art Activity Center, sport shop and removed food and retail services the MRP states, "Over time, visitors would become accustomed to the absence of these facilities and would no longer expect them as a part of their experience in Yosemite." This reasoning asserts that people will no longer miss these services once they have forgotten they ever existed. ... Comments such as this reflect a bias against commercial services and disregard for the long-standing "appropriate and necessary" criteria used in concession policy. ... Becoming "accustomed to their absence" as a standard seems inappropriate.*
>
> (Business; Correspondence #2819)
>
> *The NPS has issued several major plans recently that have a large cumulative effect on resources, particularly Visitor Experience and Recreation, and which have a significant cumulative cost. The analysis of the cumulative effect on recreational use as stated on page 9-871 is vague and does not consider significant reductions in access to recreational experiences.*
>
> (Business; Correspondence #2819)

Response: Chapter 9 evaluates the whole of the action for each alternative, emphasizing the implications of changes to park- and concessioner-provided services and park facilities (e.g., trails, roadways, parking, campgrounds). In crafting these alternatives, park managers carefully considered whether and how these

changes would affect visitors' ability to experience the park and the Merced River. After reviewing public comments on the Draft MRP/EIS, the park has revised some elements of the alternatives to retain certain services that facilitate this type of experience (e.g., Alternative 5's continuation of commercial bicycling and rafting opportunities). The document recognizes that changes to other services would still limit visitors' ability to engage in certain activities within the park. However, the effects of these changes must also be considered among others that would enhance visitors' ability to experience the park as a whole, including the Merced River and its values (e.g., habitat restoration and increased camping opportunities).. The analysis in the Chapter 9 Visitor Experience section has been revised to reflect changes to the alternatives since publication of the Draft MRP/EIS, and focus less on whether visitors would become accustomed to changes in commercial services and more on the effect of those changes upon visitors' opportunities to experience the values of the Merced River that contribute to its wild and scenic character.

Concern 249: The NPS should consider removing specific man-made features that impact the natural and aesthetic conditions of the river corridor.

> *There are two significant rock features which have been constructed in the past, and which should be considered for possible removal.*
>
> *(1.) There is a weir on the right bank of the river about 100 yards west of Swinging Bridge. This was clearly placed to prevent the river from cutting further into Leidig Meadow during very high flows. It prevents a natural process from occurring.*
>
> *(2.) The pulpit, and the causeway leading to it, at Mirror Lake is quite offensive. It perhaps does not affect the free flow of the river, but it is always in the river, even at low flows. If the purpose of this planning process is to establish more natural conditions, then this process should address the question of whether the pulpit and causeway should remain.*
>
> (Individual; Correspondence #3604)

Response: Ecological restoration actions presented in detail in Appendix E include removing rip rap where possible, and the removal of the weirs downstream of Swinging Bridge. This plan does not prescribe specific actions at Mirror Lake, which is outside river corridor boundary.

Concern 250: The NPS should remove visitor facilities that occupy a large development footprint in the river corridor, but are used by a small number of visitors.

> *MERG appreciates that the National Park Service (NPS) has established a process to analyze the existing facilities inventory and remove those that take up considerable space, but are only used by a small percentage of the people visiting the park. While they have spawned some public criticism, there are perhaps no better examples of poor overall use of space in the Valley than the skating rink and adjacent bicycle rental area in Curry Village.*
>
> (Unaffiliated Individual; Correspondence #8330)

Response: A complete discussion of the process used to analyze facilities in the river corridor can be found in "Development of Lands and Facilities" (Chapter 7). The removal or relocation of facilities such as the bike stands, the raft rental, and the ice-skating rink has the benefit of reducing the development footprint in Yosemite Valley.

Transportation

Concern 251: The NPS should not remove any historic bridges because they are essential for pedestrian and bicycle travel, as well as emergency vehicle access.

> *And if you remove the bridges, then you will have people trying to cross on their own. This will create a hazard.*
>
> (Individual; Correspondence #65)
>
> *Historic Ped/Bike bridges serve a valuable purpose. If they are damaging the river then either construct a second similar bridge adjoining the current one making a double or triple arch for the river to pas through. Or, REPLACE existing bridges with Ped/Bike/Emergency Vehicle bridges that don't have negative river impact*
>
> (Individual; Correspondence #125)
>
> *I am very concerned about removing Stoneman Bridge and not replacing it. That would mean one less route to get to Curry Village in case of emergency. In case Southside Drive is unavailable due to congestion, fire or flood, Stoneman Bridge is a needed alternate route for emergency vehicles.*
>
> (Individual; Correspondence #1326)
>
> *I vote for NO removal of bridges. The bridges were built over the rivers and are used for pedistrian and bike crossing. The bridges behind the Ahwahnee are used often by my family in biking with the grandchildren; no cars or buses and safe for the little ones.*
>
> (Individual; Correspondence #2662)

Response: Under Alternative 5 (Preferred), all historic bridges including the Sugar Pine Bridge would remain in place for the near term. To address the localized impacts that have been attributed to Sugar Pine Bridge, the NPS will initiate a study to assess the merits of various long-term bridge management strategies. The study will first assess the nature and extent of impacts associated with the bridge, and then identify and test potential mitigation measures. If mitigation measures fail to meet defined criteria for success, consideration of bridge removal would involve a public review process and additional environmental compliance. This analysis will include visitor experience (pedestrian and bicycle travel) as well as park operations (emergency vehicle access).

Concern 252: The NPS should study the feasibility of retrofitting or replacing the historic bridges to mitigate hydrologic impacts.

> *Regarding removing bridges: Instead of just removing them, replace them with better-engineered bridges. Technology exist to build bridges that have less impact on the the river, but still look similar in architecture to the old bridges. This was done with Sentinel Bridge in 1994.*
>
> (Individual; Correspondence #1326)
>
> *Removing Sugarpine and Ahwahnee bridges seems expensive and foolish, and I'm against that. Happy Isles and Stoneman bridges have "ports" to handle high flows. Can't Sugarpine be "retro-fitted"?*
>
> (Individual; Correspondence #2412)
>
> *I feel the possibility of altering Sugar Pine Bridge to mitigate it's affect on river hydrology should be investigated more throughly before it's removal.*
>
> (Individual; Correspondence #2460)
>
> *Leave all the landmark and historic bridges alone and use engineering methods to mitigate hydrological problems that exist. Regarding Sugar Pine and Stoneman Bridges, what construction / engineering methods have been considered to salvage these historic bridges, which predate WSRA and provide Valley circulation, access, and emergency egress?*
>
> (Individual; Correspondence #7820)

Response: Please see response to Concern 122.

Concern 253: The NPS should require vehicles to be parked after entering the valley and have visitors use public transportation.

> *At least you should require that cars and RVs driven into the Valley must park at their destination and stay there; no internal driving allowed.*
>
> (Individual; Correspondence #1755)

Response: The NPS encourages visitors to park their private vehicles and use public transportation when they arrive in Yosemite Valley to reduce traffic congestion. The park has designed the transportation and shuttle system with the intent to provide convenient shuttle access so that visitors will choose to use this service. However, mandating that private vehicles not be used for traveling within Yosemite Valley would not be feasible or enforceable, as there is no way to distinguish newly arriving vehicles from the vehicles that arrived previously.

Concern 254: The NPS should establish a parkwide transportation management plan to address the fragmented planning, and the collective impact and efficiency of the current system.

> *Why hasn't all this fragmented shuttle, transit and parking activity been integrated into a comprehensive Park-wide Transportation Plan with a full programmatic environmental analysis and public review?? It would seem especially important since the MRP specifically states that 70% of visitors end up in Yosemite Valley as the main hub. How can planners tinker with individual areas in piecemeal fashion without addressing their collective inpact on the throughput and efficiency of the entire system??*
>
> (Individual; Correspondence #1618)

Response: The NPS recognizes that a comprehensive Transportation Plan for Yosemite National Park is an important part of comprehensive park planning. However, each of the major visitor sites (Tuolumne Meadows, Yosemite Valley, and Mariposa Grove) have unique planning issues (restoration objectives, traffic patterns) and legal guidance (WSRA, Wilderness Act, etc.) that need to be accommodated for at the site level. Once this site-level guidance is developed for the MRP (as well as the TRP and Mariposa Grove E) this guidance can be applied to a Yosemite Long Range Transportation Plan.

Concern 255: The Park should establish a tiered entrance fee to incentivize use of efficient vehicles and charge a premium for larger vehicles.

> *Also, to help reduce air pollution in the valley, I would like to see a tiered entrance fee schedule charging electric and natural gas vehicles significantly less (or gass & disel vehicles significantly more) to enter the park.*
>
> (Individual; Correspondence #2036)

Response: Entrance fees assigned to National Park Service administered lands are set by Congress through the Federal Lands Recreation Enhancement Act (REA in P.L. 108-447). This act, which authorizes the park to charge fees, provides for the different kinds of fees, the criteria for charging them and the determination of what fee will be charged. As such, it is out of scope of this river plan to propose changes to the park entrance fees.

Concern 256: The NPS should establish a hotline or website detailing traffic and parking for high traffic days.

> *A hotline to call on high traffic days would be good, or better yet, a website that is kept up to date DAILY would be ideal. Many people travel an hour or more to get to the Park. They don't want to turn around in route but would rather find out if they can enter the Park before they head for the Park. Since cell*

phone coverage is limited outside the park on approaching roads, calling a hotline might not be ideal. Better cell phone coverage is key for communicating with the public on crowded days.

(Individual; Correspondence #2362)

Response: Currently, Yosemite National Park publishes traffic forecasts on the web on a weekly basis, this forecast is located at: http://www.nps.gov/yose/planyourvisit/traffic.htm. Visitors can also sign up at this site to have this traffic forecast for the coming week emailed to them. Since the completion of the *Parkwide Communication Data Network Environmental Assessment* in 2010, the park has been making improvements to its communications infrastructure. These improvements will support the communication of real-time traffic conditions via an intelligent traffic system.

Concern 257: The NPS should not construct additional parking in presently undeveloped areas.

I oppose constructing a new 50 space parking lot east of the Ahwahnee Hotel... I strongly oppose proposed new parking lots in presently undeveloped areas: the 100 space lot south of the El Capitan crossover road, the a day use parking lot for 300 cars west of Yosemite Lodge, or the overflow lot for 200 cars in El Portal.

(Individual; Correspondence #2273)

Response: The West Valley Day-use Parking Area has been eliminated from Alternative 5 (Preferred). The impacts of this proposed development are evaluated under Alternative 6. In Alternative 5 (Preferred,) proposed parking areas at Yosemite Lodge and El Portal are located on previously-disturbed sites, and the numbers of parking spaces are factored into transportation models and user capacity estimates for daily visitation.

Concern 258: The NPS should decrease the amount of roads and impermeable surfaces in Yosemite Valley to decrease the impacts of habitat fragmentation on biological resources.

Decreasing the amount of roads in the Valley would be beneficial for wildlife and water quality. Habitat fragmentation is a predominant concern in the Valley where so much use is concentrated along a river that normally serves as a corridor for Wildlife.

(Individual; Correspondence #2211)

Response: Habitat fragmentation of biological resources is a significant management issue in Yosemite Valley. There are a suite of management actions that are Common to Alternatives 2-6 that address the issue of habitat fragmentation through restoration of surface water flow and reduction of impermeable surfaces. Establishing a riparian buffer, removing some roadside parking and abandoned infrastructure, and removal of campsites within 100 feet of the river are all examples of actions meant to improve riparian habitat and reduce impermeable surfaces and fragmentation. Under Alternative 5 (Preferred,) restoration of 189 acres of meadow and riparian habitat will reduce impermeable surfaces and habitat fragmentation. In addition, the plan includes a specific indicator focusing on habitat fragmentation in the meadows of Yosemite Valley. The indicator examines the amount of fragmentation caused by trails and offers a suite of management recommendations to improve and restore impaired meadows and to protect all meadow habitat from fragmentation impacts.

Concern 259: The NPS should increase and improve signage to enhance wayfinding and improve traffic circulation.

Improvements to the circulation infrastructure for automobiles and pedestrians are supported by the TCTC. The existing road infrastructure creates a chaotic and inefficient circulation system that causes traffic delays and puts pedestrians in unnecessary danger. The proposed modifications to the system

will help create a more efficent, safer and free-flowing system for automobiles and pedestrians. In addition, we recommend that an emphasis on increased and better signage be implemented. Existing users of the Park have voicec concerns about a lack of direction in the Park and enhancing the way finding ability will create a more efficient and free-flowing circulation system for all modes of travel.

(Individual; Correspondence #2736)

Response: See response to Concern 352.

Concern 260: The NPS should clarify the number and types of parking spaces in the West Valley (2B) and the East Valley (2A) segments in the EIS, and analyze the impacts of this parking.

... the Cathedral Beach and Sentinal Beach picnic areas are served by informal parking areas. The parking areas at the El Capitan Picnic area is a paved parking lot with about 25 formal parking spaces plus designated spaces for handicapped, bus and RV parking. This information should be detailed in the EIS and described as an existing impact on the river segment and factored into any user capacity analysis for segment 2b.

(Organization; Correspondence #8330)

Response: Please see response to Concern 305.

Concern 261: The NPS should propose an alternative site for parking that would limit cars entering the park and not facilitate their access during peaks periods.

Under the Visitor Experience/Recreation analysis for Alternative 5, the document indicates "visitors would be encouraged to park outside of the park and take public transit into the valley." (Id., at 9-868) If so, this highlights the need for an alternative site to the new parking area at Taft Toe - one which would limit cars from entering the park and not facilitate their access during so-called peak periods. Nor does Table 9-259 provide an analysis of alternative locations to support the summary conclusion that no other sites or areas are available for the new campground and parking lot. At most, it gives a short statement of "enhanced visitor experience and essential river bank restoration" as the comparative value of Alternative 5's impacts on scenic resources (Id., 9-1458)

(Organization; Correspondence #8330)

Response: When considering areas for remote parking for this plan, the NPS considered sites within the project boundary and in locations where they would not conflict with river values. Alternative 5 (Preferred) does propose a remote site for parking that meets these criteria at Abbieville in El Portal. In Alternative 5, this site is developed with 300 parking spaces and a shuttle service is provided to facilitate access to Yosemite Valley.

Transportation—Shuttles/Public Transportation

Concern 262: The NPS should examine the practicality and convenience of visitors using public transportation to and within the park, especially those with children.

Stowing our gear proves another roadblock to encouraging mass transit. What if we bring coats for the early morning or evening? What if we have an extra backpack with water bottles or a book? I have yet to find where there is a bank of lockers for "non food" that we could rent with a locker combo. This discourages a family, especially young ones, from using mass transit.

(Individual; Correspondence #529)

... the adverse impacts of mass transit tourism on the quality of the visitor experience are well documented. "Because of the serious drawbacks of remote staging for valley access," the 1994 Alternative Transportation Feasibility Study discarded the concept as a viable option because "the cost, visitor confusion, visitor delay, information challenges, and management difficulties associated with operating

remote valley staging areas would be substantial. In return, the benefits would be minor, consisting of moderate decreases in vehicle traffic along sections of park road that are not congested. Perhaps the greatest drawback of remote staging would be the loss of visitors' personal freedom to experience portions of Yosemite at their own pace and in their own way." As far back as the1988 "Feasibility Study Relating to Increased Bus Traffic in Yosemite," then-Superintendent John Morehead warned Congress that "increasing the number of?buses in the park would increase the number of bus passengers who represent an older, slightly wealthier, and a non-family unit, and would cause a resulting decrease in the number of traditional families, especially those with children, who rely upon an automobile to travel." Additionally, previous plans documented at great length the adverse impact busing would have on the quality of the recreation experience for day visitors. The entire issue of mass transit/assembly line tourism from a visitor experience perspective appears to have been ignored in the DEIS; Park administrators merely assume that funneling visitors onto buses will "improve" their experience.

(Individual; Correspondence #1617)

Response: Different types of visitors will have different transportation needs based on the type of experience that they are seeking. For this reason, the park does not intend to close the park to private vehicles, but rather provide a range of transportation opportunities for individuals to choose from. These transportation opportunities include access to the park by private vehicles as well as regional transit and commercial tours.

Concern 263: The NPS should consider the feasibility of transporting employees from remote housing locations to work in Yosemite Valley.

I understand much of the employee housing will be removed. This will require a huge increase in transportation moving all of these people in and out of the park on a daily basis ...

(Individual; Correspondence #116)

Response: The NPS provides transit subsidies to encourage employees living in remote locations to utilize public transit and regional transportation routes have been designed to make stops in places that can serve employees needs as well as visitor needs. Furthermore, under the preferred alternative (Alternative 5), additional transit runs will be provided and shuttle service added from the El Portal Remote Parking Area. Those employees who choose to drive private vehicles will continue to be accounted for in transportation system planning for the park.

Concern 264: The NPS should consider implementing a shuttle system modeled on the success of those used in other National Parks such as Zion and Grand Canyon.

Perhaps additional accommodation & a bus system similar to the one at Zion could be part of the plan? More parking lots with better (zero emissions) busses would decrease congestion & pollution. Perhaps patrons could pay extra if they wanted to use their own vehicles instead of the bus.

(Individual; Correspondence #642)

After visiting both Zion National Park and then Yosemite NP in the same trip last summer, it became clear to me that Yosemite should adopt the bus system currently in place at Zion. It is efficient, clean, and eliminates the hazards and ugliness of personal vehicles in this beautiful canyon. It also provides access to all visitors, helps provide information about the various parts of the valley (via the driver/guides), and reduces pollution and impact where it is most critical: our National Park.

(Individual; Correspondence #1066)

I have visited at the Grand Canyon and Zyon when both have had mandatory bus service. This really is suitable for most visitors. If Yosemite were to follow this idea, I think it would also need to ensure access to all trail heads via bus.

(Individual; Correspondence #2116)

Response: Please see response for Concern 327.

Concern 265: The NPS should improve existing shuttle stops, and construct new ones in areas of new development.

> *The Shuttle Bus stops adjacent to the campgrounds as well as Camp Curry Parking do not have a covered waiting area. The Ahwahnee Hotel, the Lodge and other concessionaire locations have nice covered bus waiting areas. This does not seem at all fair to the family campers in the valley. Are there plans to address this unfair situation? Certainly these campers contribute to the business income in the Park.*
>
> (Individual; Correspondence #2199)
>
> ** Day-use shuttle bus stop. Will there be a shuttle bus stop near the south end of this parking area so that folks don't have to walk all the way up to the Village Store area to catch the shuttle? I don't see a mention of one. There is currently a separate stop at the Camp 6 day-use parking area; one should be included in the redesigned parking area.*
>
> (Individual; Correspondence #2607)
>
> *In order to minimize vehicle use for campers and climbers traveling up-valley to recreate, eat, etc., it is critical to offer ample shuttle service – paying attention to the frequency as well as the number of stops -- near Eagle Creek*
>
> (Individual; Correspondence #3694)

Response: The NPS intends to design new parking areas so that visitors can easily access in-park shuttle operations. Formalized shuttle stops are also planned near Camp 4 and at El Capitan Meadow. The Wawona Store shuttle stop will also be re-designed. A shuttle stop on the southern end of Yosemite Village Day-use Parking Area has been added to the description and design considerations for Alternative 5 (Preferred) in the MRP/FEIS.

Concern 266: The NPS should consider creating an online trip calculator for its shuttle system.

> *We are planning our summer trip to Yosemite, and we appreciate reading about shuttles within the park so we don't have to drive everywhere separately. This is a huge improvement over what we experienced at the Grand Canyon in the early 90s, where there were no free shuttles and each tourist drove separately from point to point. However, you need to do some serious website improvements to encourage people to take the Yarts transportation into the park itself. I would strongly suggest you create a trip planner/calculator, which will calculate the fees and the times, with various menus*
>
> (Individual; Correspondence #529)

Response: Communicating to the public about available public transportation opportunities available for getting to and around the Park is an important strategy the NPS employs to alleviate traffic congestion and improve visitor experience. Both regional transit schedules (YARTS) as well as within-park shuttle schedules are available online on the park's website. The park's website at www.nps.gov/yose includes a link for "Getting Around" complete with maps, schedules, bus fares, mileage, and drive times. Use of an Intelligent Traffic System (ITS) is currently limited by lack of infrastructure. However, since the completion of the *Parkwide Communication Data Network Environmental Assessment* in 2010, the NPS has been working to make improvements that will support an ITS. As the ITS is developed, it will enable the park to develop additional communication and planning tools for visitors to use regarding traffic, travel, and road conditions throughout the park.

Concern 267: The NPS should clarify plans for regional transit routes.

> *The NPS should be planning for the not-to-distant future when High-Speed Rail connects Merced to the Bay Area and Los Angeles, meaning that Merced is less than a short trip from major metropolitan centers. Providing seamless, convenient and efficient bus connections from the HSR station in Merced to the Valley could be a major solution to reducing car trips to Yosemite.*
>
> (Individual; Correspondence #1334)
>
> *Please clarify whether the regional transit runs from Merced, Fresno, Sonora and Lee Vining are round trip. For example, are the 12 daily runs during the peak season from Merced round-trip or one way? Will the park visitor transportation system (shuttle) be sufficient to absorb regional transit passengers as well as other users?*
>
> (Individual; Correspondence #2133)

Response: The regional transit system (YARTS) is contracted with Amtrak to provide bus service to and from Yosemite along the Highway 140 corridor with connections to trains in Merced. Currently, there is no other transit service provided along the Highway 120 west corridor that YARTS could connect with. With the addition of YARTS service along the Highway 41 corridor, opportunities will arise to connect with local and regional transit in Oakhurst and Fresno. As these new systems are developed, The NPS will continue to coordinate with transit providers to ensure seamless connections when scheduling service to the park.

When planning for regional transit, the NPS assumes all runs are round trip. For example, the Alternative 5 (Preferred) proposes 12 runs per day that start in Merced/Mariposa, travel to Yosemite Valley, and then return to Mariposa/Merced. The description of Alternative 5 (Preferred) has been updated to clarify this point.

Concern 268: The NPS should establish an incentive program for people willing to take public transportation into the Park.

> *I also wish that there could be a way to decrease the number of cars coming into the Valley. Perhaps an incentive program could be drawn up for those who park outside at the El Portal entrance and take a shuttle in. Free parking and admission into Yosemite? And day use visitors who do drive their cars in could be required to pay an extra fee? I really feel that we need to encourage and incentivize public transportation.*
>
> (Individual; Correspondence #920)
>
> *Perhaps the most palatable way to encourage people to leave their cars at parking lots outside the Valley and take a bus would be some kind of incentive program, like offering free camping or entry or priority reservations or a dozen donuts or something.*
>
> (Individual; Correspondence #1755)
>
> *people who are willing to shuttle in can have a price break. extra gear storage near the seating areas, where people can feel their gear is safe and with them will encourage backpackers to shuttle in as well. these shuttles should be different than the loop shuttles.*
>
> (Individual; Correspondence #2005)

Response: Incentives are an important strategy to employ when asking visitors to try new things, like parking in remote lots and utilizing shuttle or transit service. During the design and implementation of any remote parking opportunities, Yosemite managers will analyze what kind of incentives would be effective for park visitors who chose to use remote lots or take public transportation. Currently, the park entrance fee is waived for those visitors who take regional transportation into the park (YARTS,) which serves as an incentive.

Concern 269: The NPS should establish additional areas of the park that are only accessible by bus.

I agree with the Access Fund that the further degradation of El Capitan meadow and the surrounding area should be avoided. This is a special place for climbers, and for all park visitors. I understand from a management stand point that it is also very congested, but a new overflow parking lot would severely affect the experience in this area. If anything one proposal could be to do something similar to what Zion National Park has done with their shuttle system. If no parking was allowed in the El Cap meadow area, and it was only accessible by bus, the area would maintain it's natural feel more completely.

(Individual; Correspondence #1971)

People driving around in theirs cars all day is an issue. Some areas should be bus only, unless you are staying in the campground, at the lodging on the valley floor, and/or possibly for business use.

(Individual; Correspondence #2106)

Response: Given the current configuration of roadways in Yosemite Valley, it would be challenging to restrict private vehicles from other areas of the park besides the Happy Isles Loop road. At this time, the NPS is not considering any changes to roadways that would restrict private vehicle access, beyond removal of some roadside parking and implementation of "bus and service vehicle only" lanes during peak season.

Concern 270: The NPS should establish an electric tram system to transport people around the park.

You have recommended electric trams to carry people around the valley and hopefully there will be fewer cars allowed inside the park NOT more. Electric vehicles would be a solution as well as electric trams and perhaps a railroad that runs along the beautiful Merced River. The existing tracks could easily be adapted to a light-rail electric train to carry passengers into the park during the day and supplies for the concessionaire at night. Perhaps a "theme" design to look like a 19th Century Steam Locomotive with matching railroad cars. The line travels along the Merced River and would provide a most delightful and tranquile entrance into the park.

(Individual; Correspondence #2377)

Response: An electric tram system would require the NPS to develop a substantial amount of additional infrastructure to support that system. Suggestions to provide that level of additional infrastructure to Yosemite Valley have been dismissed from further analysis as infeasible.

Concern 271: The NPS should improve the current shuttle system by extending the service to areas not currently served and increasing the frequency of shuttles.

The proposal of using YARTS for overflow auto traffic is an excellent one, except for one item, accessibility to recreational areas such as picnic grounds, and others not served by the Yosemite transportation system known as the Shuttle.

(Individual; Correspondence #120)

Providing shuttle bus service to Bridal Veil is an important service, but I don't think a 60 minute interval is sufficient. The interval should be no more than every 30 minutes and preferably less in peak season.

(Individual; Correspondence #1287)

Extended shuttle service to the West Valley should also include stops at Sentinel Beach Picnic area and Gates of the Valley. Sixty minutes between shuttles is much too long and might influence people's decision on whether to take the shuttle or drive their own vehicles.

(Individual; Correspondence #2460)

Glacier Point is one of the destinations that people are directed to go to if the valley is crowded and parking is not available. However, Glacier Point also gets over crowded. Instead of having a direct shuttle to Glacier Point from Badger Pass, stops along the way, such as at the Taft Point- Sentinel Dome

trailhead and Washburn Point, would disperse visitors to other points of interest along Glacier Point Road without them having to use their vehicles.

(Individual; Correspondence #2460)

In the winter there is a bus that goes from the valley to Badger Pass. Could there be a bus in the summer that would go down to Mariposa Grove. I don't like using my car any more than I have to could the shuttle system be expanded to go to the Cathedral Beach?

(Individual; Correspondence #2634)

Response: Alternative 5 (Preferred) reduces shuttle headways (increases the frequency of shuttles) on the most popular routes. It also expands shuttle service to additional locations that are not currently serviced by shuttles. New service is provided to West Valley and Bridalveil Falls in the Alternative 5 (Preferred,) along with additional shuttle stop locations along these routes. These intermediate shuttle stop locations may be adjusted based on visitor use patterns over time.

New shuttle service will be added between the El Portal Remote Parking Area and Yosemite Valley to provide access for those choosing to use this remote parking option. This service will run daily, with increased service on holidays and weekends during the peak summer season.

Additionally, shuttle routes are designed to reduce redundant services along the major corridors in Yosemite National Park. For example, because of the increased level of transit service proposed on Hwy 41, the shuttle between Yosemite Valley and Wawona will be eliminated.

Concern 272: The NPS should prioritize improving the public transportation system so that visitors choose to use it instead of using private vehicles.

My opinion is that driving into Yosemite Valley should be discouraged. By that I do not mean that driving should be banned. Rather public transportation should be so well thought out and effecient that visitors actually choose public transportation rather then driving into Yosemite Valley. I realize that highly efficient public transportation is not practicalbe now; but it should be a primary goal.

(Individual; Correspondence #1570)

Response: Alternative 5 (Preferred) in the MRP/FEIS improves public transportation by providing opportunity for public transit on all major corridors into Yosemite National Park, as well as increasing the number of runs on a few critical travel corridors. Please see the discussion of the Alternative 5 (Preferred) in the MRP/FEIS for additional details on these public transit opportunities.

Concern 273: The NPS should re-allocate the funding proposed to expand regional transit, and instead apply it to deferred maintenance of existing park infrastructure

Initial capital cost estimates for startup range from $6-9 million while projected annual operating costs for transit along the Highway 41 corridor are expected to be nearly $3 million annually. Fresno is on the brink of bankruptcy, Madera is millions of dollars in debt, the State and Federal governments are in dire financial straits'is the Park Service so flush with cash that they can bankroll such an expensive proposition that serves so few, when precious dollars are urgently needed inside the Park for backlog maintenance??

(Individual; Correspondence #1617)

Response: The Park's financial contributions to regional transit are made through the NPS Recreation Fee Program and Concessions Franchise Fees. While these funds may be used to build new facilities that enhance visitor use of the park, the funds cannot be used for maintenance or repair of existing facilities. Only line-item construction and operations fees may be applied to maintenance and repair.

Park participation in regional transit is supplemental to funds that are provided through state or local transportation agencies for transportation purposes. Similarly, local agencies can use transportation funds only for transportation purposes, which are collected through motor fuel taxes, and do not have the discretion to use transportation dollars for their regular operating expenses or capital improvement projects.

Concern 274: The NPS should not institutionalize transit on additional corridors because it does not have the authority to create a regional transportation system outside park boundaries.

> *Regional Transportation. Past plans have clearly stated that the "National Park Service does not have the authority to create a regional transportation system outside park boundaries" and as a result, alternatives would not be "dependent on the implementation of regional transit." Yet in the Merced River Plan DEIS, transit expansion from Fresno to Yosemite along Highway 41 appears to be a key element across all of the action alternatives'to the point of including it as an amendment to the GMP. Additionally, the 2-year demonstration project that was started in 2012 from Sonora to Yosemite Valley along Highway 120W is also considered a key element across all alternatives, even though it's only been in existence as an experimental project for 1 year and ridership has been less than anticipated. The Park Service claims to view YARTS as a "partner" of sorts, but only Mariposa, Merced, and Mono Counties have signed on to the Joint Powers Agreement (JPA); Fresno and Madera along Highway 41 and Tuolumne on the 120W corridor are not "partners" in that agreement, so what authority does the Park have to institutionalize transit along those corridors as key elements in the DEIS??*
>
> (Individual; Correspondence #1617)

Response: The regional transit services proposed in the *Final Merced River Plan/EIS* are not included as services that YNP will be providing, but rather, they are included to articulate a maximum allowance of how much regional transit would be allowed under any alternative. One of the requirements of the MRP was to define a maximum capacity for each river segment. To do this, the plan had to define the maximum number of regional transit lines that would be allowed to operate in YNP, and articulate which corridors they would travel through to ensure that individuals arriving to the corridor via public transit were included in capacity calculations.

Concern 275: The NPS should provide additional detail on the strategy to encourage ridership on increased regional transit buses.

> *Interestingly, the DEIS references 12 roundtrip transit runs from Fresno to Yosemite carrying 311 people. Even Fresno's "Feasibility" study only discussed 6-8 runs at full buildout, so where did the number 12 come from?? And with no established route even in place upon which to base a track record, what strategies is the Park planning to "encourage" 311 people to spend 1.5 to 3.5 hours sitting on a bus one-way'especially since ridership along other corridors has failed miserably below initial projections.*
>
> (Individual; Correspondence #1617)

Response: The MRP strives to provide individuals with a variety of mechanisms by which they can access Yosemite National Park and more specifically areas of the Merced River corridor, including public transit. In places where the MRP is proposing new regional transit service (such as along the Hwy 41 corridor), the NPS will work with gateway communities, regional transit providers, and others to ensure that the location, distribution and range of stops are reasonable. For example, in Alternative 5 (Preferred) the MRP allows for 12 round trip regional transit runs on the Highway 41corridor. Six of these runs could originate in Fresno, while the other 6 could originate in Oakhurst (similar to the regional transit service provided on the Highway 140 corridor). This distribution would allow for some longer runs for distance travelers coming

from Fresno International Airport while also having some shorter local runs for those visitors staying in the Oakhurst/Fish Camp area.

Park staff work with business and governmental entities on all of the Gateway corridors into the park to encourage and provide accurate information to travelers wishing to utilize public transit systems to facilitate their visit to Yosemite. On the Highway 41 corridor specifically, Fresno County transportation agencies indicate there is sufficient demand for this service and are currently seeking funding to initiate pilot service on that corridor.

Concern 276: The NPS should consider implementing a monorail system to reduce traffic congestion.

> *A Long term goal would be to develop a Monorail transpotation system in the valley.*
>
> *This would eliminate bus and visitor traffic significantly.*
>
> (Individual; Correspondence #1834)
>
> *One of the biggest problems that Yosemite Valley seems to have, is the polution of car, truck, and bus emissions, as wel as trash that is littered by irresponsible citizens. In my opinion, it would not only seem much more economical in the long-run to reinstate train services into and out of the park. My suggestion would be a mono-rail train similar to the one seen in the Disneyland theme park. Not only could you place the mono-rail path over the currently existing paved roads, but by doing such you will elevate the train off the ground, allowing for the migration of animals and plants to be undisturbed. Also, it will decrease chances for people to be encouraged to litter on the Yosemite Valley floor.*
>
> (Individual; Correspondence #3486)

Response: While in previous scoping projects and transportation system analyses, Yosemite National Park did consider monorail or light rail system, and determined that it would require the NPS to develop a substantial amount of additional infrastructure to support that system. Suggestions to provide that level of additional infrastructure to Yosemite Valley have been dismissed from further analysis as infeasible.

Concern 277: The NPS should equip shuttle buses with bike racks to improve ease of bike use within the park.

> *It seems counterproductive to remove the bike rentals if the goal is to improve air quality. Instead make it easier for bikers to use the park while reducing car traffic by having buses that can carry bikes.*
>
> (Individual; Correspondence #2656)
>
> *Improve the bus transportation into Yosemite so day visitors can take the Yosemite shuttle system. Make sure the buses can also carry bicycles and backpacks. Have lockers available for day visitors in Yosemite. Make sure the parking areas where people leave their cars to get the Yosemite bus are secure.*
>
> (Individual; Correspondence #3230)

Response: Determining the specific type or components of transportation vehicles is out of the scope of this plan. However, the park may explore adding bike racks to shuttle buses for those routes that extend to West Valley in the future when buses are due for upgrades.

Concern 278: The NPS should encourage auto-based visitation because it is safer, more sustainable, and a more practical form of transportation than diesel buses.

> *... there has been a lot of speculation over the years about closing the park to cars, bringing in many more shuttles and transporting visitors to the park in that manner. Many years ago, we traveled to the Grand Canyon with our children, both under 2 yrs. old at the time. We had to catch a shuttle on a busy day, with diaper bag, food bag, stroller.....you can well imagine it was not fun. ... Needless to say, we have never gone back as our trip was not a pleasant experience and I know the Grand Canyon is*

beautiful. ... To get rid of cars sounds great; but in practical application I am not so sure. On one of the park publication someone talked about flying into the area, using public transportation.....has someone really tried to do this with say an average family of four with luggage. Say you fly to SFO, then on to Fresno, what then, catch a Fresno area bus to.....Amtrak take this to Merced to catch a bus to get to Yosemite. What are the chances of all these modes of transportation lining up timing-wise. Sounds complicated.

(Individual; Correspondence #164)

Auto based camping is wise and supported due to the regulation emissions on autos versus the unregulated massive polluting diesel buses that now transport visitors to the Park. Auto based visitation is more eco-friendly. Besides, the roads in the Park are NOT engineered/designed for buses but rather autos and light trucks. Using CNG buses is precluded by the Park not being able to establish CNG filling stations for the busses. Moreover, the weight balance is upset as luggage needs to be loaded beneath the passengers but CNG busses have their tanks and mechanics below the passengers leaving luggage loading and storage to the top of the vehicle that won't facilitate safe travel through the roads as they would be top-heavy.

(Individual; Correspondence #7820)

Response: Please see response to Concern 262.

Concern 279: The NPS should consider providing dedicated transportation for climbers from campgrounds to popular climbing locations to reduce traffic and parking congestion.

Planners should consider the viability of providing dedicated transportation for climbers from the campgrounds (especially Camp 4) down-valley to climbing locations at El Cap Meadow, but especially in the Lower Gorge at Cookie Cliff, Cascade Falls, and Arch Rock. The park could use 10-person vans for this purpose that would not require large turnaround locations; this would reduce traffic and parking congestions to popular climbing locations. We also think that any person arriving in the Valley by transit should be guaranteed a campsite upon arrival, without a reservation, to encourage transit use. If this ceases to be the rarity it is now, the Park can develop an alternative policy.

(Individual; Correspondence #3689)

Response: Alternative 5 (Preferred) in the MRP/FEIS does expand shuttle service to the West Valley and El Capitan Meadow area and increases the frequency of this service. However, due to the traffic pattern in the Merced Gorge (Segment 3) running shuttles into this segment for a small number of users is not feasible.

Transportation—Parking

Concern 280: The NPS should reduce administrative parking within Yosemite Valley.

Reduce employee and other "overhead" parking, not just visitor parking (lead by example, you can get a lot of park business done with fewer vehicles)

(Individual; Correspondence #16)

This includes employee and other parking that is not just for visitors, but how many parking spaces are really needed to effectively manage the park operations? NPS must lead by example and show that they can do their job without a bunch of trucks and parking spaces for most of their employees. Staff can make use of the shuttles, bicycles and other shared transit that don't bury Yosemite valley under so much asphalt.

(Individual; Correspondence #16)

Between the Yosemite shuttle system and YARTS, there is no reason whatsoever for any employee to have a private vehicle at the park. You need to do an analysis to see which is more environmentally sound: ice skating, or allowing 164 more people to drive private vehicles to Yosemite.

(Individual; Correspondence #82)

Response: The NPS does not require employees of either the park or other park partners to participate in public transit initiatives (although employees are encouraged to participate in these programs). Additionally, because public transit and shuttle service is designed primarily for park visitors, they do not run on schedules that are conducive to all employees' work schedules. Therefore, park planners had to provide administrative parking that is commensurate with the level of service that is being provided in each of the alternatives. In Alternative 5 (preferred) the NPS assumes that roughly 20% of employees will reside outside of Yosemite Valley and will participate in public transit or shuttle service.

Concern 281: The NPS should not construct additional parking in the West Valley because new development will adversely impact river values.

> *I am concerned about the possible environmental damage from constructing all-new parking lots in the West Valley. I would rather see more opportunities for people to park outside the park proper, perhaps in El Portal and Mariposa, and ride the transit systems into the park.*
>
> (Individual; Correspondence #2126)
>
> *... the West Valley parking lot proposed in the Preferred Alternative is not "necessary," constitutes development in the river corridor in a previously undisturbed location, and does not protect or enhance river values. All of the above combines to make the West Valley parking lot inconsistent with the WSRA because the new lot would be created within the river corridor. But there are additional NEPA reasons not to allow a new West Valley parking area as proposed in Alternative 5. - CSERC asserts that the DEIS failed to communicate that the adverse biological impacts associated with the creation of any large new parking lot would potentially be significantly greater than the benefit of providing 100 extra parking spaces that would primarily only be utilized during the busiest times of the busiest days of the summer season.*
>
> (Individual; Correspondence #2210)
>
> *... it is not logical for the Park to spend $1.2 million dollars to provide 100 parking spaces that would only be utilized for such a small part of the year – only when use levels reach or rise close to their maximum. The impact of the lot would be disproportionate to the service it would provide. Parking lots create a water quality threat, as is shown by the 9-16% of water samples that had petroleum hydrocarbons in them (DEIS 5-23). ... Instead, the Park is calling for a 5% increase in parking in the Valley, including the construction of the new West Valley parking lot. - The FEIS should show that the increase in parking as allowed by Alternative 5, including the West Valley parking lot, is (in total) a clear conflict with the GMP direction to remove excess day parking spaces.*
>
> (Individual; Correspondence #2210)
>
> *I am concerned about the visual impact of an overflow parking lot in the West Valley. How visible will it be from the road and from the Taft Point area? Again, it is development in the West Valley which I am against and its construction should be postponed until the other traffic controls and parking changes have been evaluated with respect to how they control traffic.*
>
> (Individual; Correspondence #2460)

Response: Alternative 5 (Preferred Alternative) has been revised and the West Valley Temporary Overflow Parking Area is no longer proposed. However, it does remain as a viable action evaluated in Alternative 6. This parking lot would be consistent with the level of development permissible in a scenic segment, with the shoreline remaining largely undeveloped and primitive. The NPS determined that development of a parking area in the proposed location would not have local adverse impacts on river values, provided that standard mitigation measures are implemented during the design and construction process.

Concern 282: The NPS should consider environmental design and improvements in parking facilities, including solar panel shade structures, use of permeable materials, or underground parking facilities.

Design parking lots with special attention to aesthetics using permeable materials.

(Individual; Correspondence #567)

Or better, allow only cars with lodging reservations into valley. Underground parking garage for day visitors where route 120 and 140 meet, then use shuttles into valley.

(Individual; Correspondence #977)

The parking area might be provided with a solar panel cover, both to charge the plugins and to shade the parked vehicles. Visual side shields should be provided to block the glare from the higher elevation entrance roads. Excess solar power could be distributed to the existing solar facility in El Portal. Low overnight grid rates would probably be cost effective for the routine overnight charge for the hybrids.

(Individual; Correspondence #2034)

Response: The primary purpose of the river plan has been to identify, protect and enhance river values in the Merced Wild and Scenic River corridor. While specific site improvement concepts are included in the plan, they are offered as illustrations. Detailed suggestions for parking areas are appreciated and will be carried forward into future design efforts, but generally exceed the scope of the planning effort at this time.

Concern 283: The NPS should provide real-time parking and road information through the use of the AM radio station.

AM radio station in valley should broadcast parking availability (or non availability) and road congestion in real time.

(Individual; Correspondence #125)

A real time notification system outside the park showing parking availability inside the park would help avoid congestion, as would better traffic flow in the park to move past the Valley without entering the worst congested areas.

(Individual; Correspondence #835)

Response: The NPS continually strives to provide the best and most useful communication to the public about parking and road condition information. This currently includes traffic forecasts on the web, changeable message signs with critical information on roadways and at entrance stations, and mobile apps. The park is working to develop mechanisms for real time traffic information for web based mechanisms so that it can be distributed to a variety of communication networks.

Concern 284: The NPS should not increase parking because it will result in more traffic and congestion.

I would not want to see more spaces for visitors in Yosemite... More visitors means more traffic, more pollution and more destruction of the environment, regardless of the proposed changes in traffic patterns, etc.

(Individual; Correspondence #1083)

Increasing the parking by 11%. Although the parking is a major problem, with respect this is unlikely to be the solution. Indeed, it may make matters worse by stimulating demand.

(Individual; Correspondence #1153)

I don't see how increasing parking spaces in the Valley is going to improve things. Parking should be reduced, not increased, and there should be a greater emphasis on public transportation, with bus connections to points outside the Valley.

(Individual; Correspondence #1164)

Response: Please see response to Concern 287.

Concern 285: The NPS should increase parking outside of the Valley and provide a shuttle service into the park, especially for day-use visitors.

> *I think the bus system, and especially the green buses, are one of the best decisions ever. I would love to see day-users have the opportunity to park on the outskirts of the park and bus in on a free, green bus... You really don't need cars in the valley unless you are camping and most day users would love a free bus that would do all the work so they can gawk out the windows on the approach into Yosemite Valley. I think the system used in Mammoth in the Red's Meadown/Devils Postpile area works quite well.*
>
> (Individual; Correspondence #774)
>
> *I have felt for years that the smart move would be to establish parking lots outside of the park and then bus day use partons into the park from there. This would elimintate the horrific traffic jams and polution caused by that traffic. The only people allowed to drive into the park would be those of us who were staying overnight.*
>
> (Individual; Correspondence #904)
>
> *Past superintendents told CSERC staff directly that it was a matter of political opposition that blocked the out-of-valley parking lots from being implemented, not resource issues. The claim that no parking can be created at Crane Flat for example exaggerates the resource conflict. Again, EIS contains false information that alleges that the Park cannot comply with the GMP goal to scale back vehicles in Yosemite Valley because there is a lack of buildable land outside the Valley. That may have limited options tied to the original design and placement of out of valley parking transfer lots. But superintendent Tollefson and now Don Neubacher have both distanced themselves from any actual consideration of out of valley parking. That still does not mean that either out of valley parking is infeasible or that the Park could not take many other actions to curtail or reduce vehicles in Yosemite Valley. The FEIS needs to provide correction of the false information.*
>
> (Individual; Correspondence #2207)
>
> *If you further forced day-use visitors who DO NOT have an existing reservation to stay in the Valley to park outside the Valley entrances and have them pay a fee to take a shuttle into the Valley for the day, this would further reduce the day-use traffic and provide a more enjoyable experience for all. For people that are staying outside of the Valley and want to enter the Valley for up to a week, you could also offer either a multi-day shuttle pass or a week-long shuttle pass.*
>
> (Individual; Correspondence #2463)
>
> *First, adding more day use parking to an already overburdened park is unacceptable. It would be more environmentally friendly to have a huge parking lot (perhaps Wawona area) just outside the park and have visitors shuttled into the park (even better with electric/hybrid vehicles). This would significantly reduce pollution in the valley. You could possibly increase the entrance fee to the park to cover the costs of additional transportation vehicles or charge a small fee per person to users.*
>
> (Individual; Correspondence #2605)

Response: The Yosemite Area Regional Transportation System recently extended service on west Hwy 120 (to Groveland and Sonora), and is planning service on Hwy 41 to and from Fresno. The NPS cannot, by itself, operate bus service or provide parking areas outside park boundaries.

The *Final Merced River Plan/EIS* proposes a remote parking facility with 300 spaces to augment existing Hwy 140 bus service at the Abbieville site in El Portal.

Parks such as Devils Postpile and Zion are characterized by a single point of entry, pre-existing remote parking facilities, and short travel routes for visitors. In contrast, Yosemite has four entrance stations, with each gateway community a distance of 43 miles or more from Yosemite Valley. Outside of Yosemite Valley,

Wawona and El Portal, the topography of park land is steeply sloped. The NPS will continue to support regional transit and participate in cost-sharing, but must work in partnership with regional transportation and local government agencies.

Concern 286: The NPS should provide more parking spaces to accommodate the increase in camping spots.

> *In looking over the preferred plan, it occurred to me that an error may have been made. The plan calls for basically doubling the capacity of camp sites for camp 4 by adding additional sites east of the current parking lot. Camp 4 is usually at or over capacity during certain months and additional sites would be a welcome improvement. However, the need for additional parking seems to have been overlooked.*
>
> *During peak times available parking spaces are almost non-existant. Not only are those spaces used by campers. But also hikers bound for Yosemite falls and the high country.*
>
> *Increasing the number of campsites without additional parking will only compound the visitor problems the MRP is trying to correct.*
>
> (Individual; Correspondence #1039)

Response: In Alternative 5 (Preferred)each camping area that is developed is also developed with parking in mind. In the drive-in campgrounds the parking is located in the site. For walk-in campgrounds, parking lots are sized so they can handle the anticipated demand for overnight parking. In the case of Camp 4, additional parking for overnight campers is being provided through an expansion of the Camp 4 parking lot, formalizing the former gas station area for parking, as well as some overflow across Northside Drive from Camp 4.

Concern 287: The NPS should increase parking to help meet demand and reduce congestion created by circulating vehicles.

> *I believe on of the best things that could be done is to find a way to make more parking. Many times even when we have an overnight accommodation we have to either drive around and look for a spot or sit and wait for a spot to open. This lack of parking seems to create more congestion and pollution.*
>
> (Individual; Correspondence #574)
>
> *We need more parking to have people take the bus when they are in the valley. More parking will allow more people to stop driving around the valley floor to try and find a place to park. More parking will also allow people to get out of their cars and walk around the valley floor.*
>
> (Individual; Correspondence #1382)
>
> *Additionally, the Preferred Alternative calls for an increase in parking spaces. Since adequate parking is essential to preventing traffic congestion in the park, our Board is grateful to see the increase. However, we encourage more parking be restored than is indicated in Alternative 5 to adequately provide for visitor needs and to help address traffic congestion. ... At least 3,500 day-use parking spaces should be maintained in the Valley with further increases where environmentally compatible. Adding additional camping/parking will allow for increased user capacity and may prevent a movement to limit visitation by initiating a day-use reservation system.*
>
> (Individual; Correspondence #1984)

Response: In Alternative 5 (Preferred), the NPS does increase parking capacity for Yosemite Valley. However, while increasing parking does allow for a higher capacity for Yosemite Valley, it is not the only tool used to reduce congestion. Traffic congestion in Yosemite Valley most often occurs when the number of cars in Yosemite Valley exceeds available parking places. Alternative 5 (Preferred) reduces traffic and congestion because it manages the number of cars that are allowed into Yosemite Valley at any one point in

time (thus balancing supply and demand for parking) and concentrates parking spaces into larger centralized areas, allowing visitors to more easily find parking without having to circulate on roadways.

Concern 288: The NPS should delineate and number all parking spaces to increase the efficiency of existing and proposed parking areas.

> *I strongly support the concept of having a system of designated parking spaces in the Valley. In my recent experience, the main Curry Village and Yosemite Village parking lots are complete anarchy on busy days. With no clearly marked spaces, it is difficult for drivers to determine where they are supposed to park. As the lots fill, frantic drivers are forced to squeeze unsafely into narrow gaps, park partly on rocks at crazy angles, break down bushes, etc. Obviously, these churned-up areas are creating sediment and car pollution that ultimately gets into the river. This nightmare parking fiasco obviously does not contribute to a pleasing national park experience either. Clearly numbered and appropriately designed parking spaces would be a vast improvement. With modern parking lots, perhaps oil and tire residue in lot runoff could be filtered to further protect the river.*
>
> (Individual; Correspondence #336)

Response: Formalized parking areas that are paved will include clearly delineated pavement markings to reduce confusion and to minimize resource damage. While numbering each of the spaces can be an effective parking management tool in urbanized environments, it is generally not desirable in a park or more natural setting. The NPS will design all parking areas in a manner that facilitates efficient circulation and way-finding and assign staff to direct traffic as needed on busy days. Additionally, alternative paving, and stormwater treatment methods such as bioswales will be considered for all new parking areas.

Concern 289: The NPS should establish a minimum number of Yosemite Valley day-use parking spaces to be codified in the General Management Plan Amendment.

> *The day-visitor parking space number in Segment 2 needs to be corrected to specify the actual number of such spaces available to the public in Yosemite Valley and that number needs to be codified as a GMP amendment since day visitor capacity is dependent on parking availability.*
>
> (Individual; Correspondence #1617)

Response: The General Management Plan has been amended to reflect actions in the MRP. Specific amendments to the General Management Plan are described in Appendix A and include a revised number of day-use parking spaces in Yosemite Valley.

Concern 290: The NPS should allow for an expansion of future parking facilities in the West Valley as part of the plan.

> *A bear proof parking structure might be a valuable addition to the plan off Wawona Rd perhaps between current parking on Wawona and El Portal Rd just before the Southside drive crosses the Merced. It looks like existing trees bordering a clearcut might be incorporated as a screen for the structure from the park side.*
>
> (Individual; Correspondence #79)
>
> *Congratulations on a job well done. My only comment is that you might consider being able to expand the West Valley parking in future years. I have personally walked the area between the El Capitan Crossover and the Valley Loop Trail, and between Southside Drive and the Merced River. Cars could be parked among the trees and hidden from view from the Wawona Tunnel. This possibility was considered in a previous plan, so a lot of preliminary work has probably been done. This parking area would not need to be developed until the visitor volumne to the East Valley reaches critical limits, at a future date. But, I think it wise to include it in the present planning effort, to hedge the future.*
>
> (Individual; Correspondence #241)

West Valley and El Portal Overflow Parking – This alternative calls for the construction of a 100 car overflow parking lot near the El Capitan Crossover as well as the development of a 200 car parking lot in El Portal. Instead of building 2 parking lots, I propose building one 300 car parking lot in the West Valley. Based on the outcome of another comment I have made concerning visitor parking at the Lodge, the number of parking places at this location may need to be increased. It would be less expensive to develop one large lot than two separate lots and it will also be less expensive to manage one lot than 2. Additionally, since the purpose of this plan is to protect the river, it would be better to place the parking in the proposed west valley area because it is removed from the river, whereas the El Portal location is directly adjacent to the river.

(Individual; Correspondence #1690)

Response: The West Valley Overflow parking area remains a component of Alternative 6, and is therefore analyzed in the range of alternatives. However, an expansion parking facilities in the West Valley in the future was dismissed due to site constraints and public comment. Due to the volume and content of public comment that expressed strong opposition to any development in the West Valley, all proposed facility construction has been rescinded from Alternative 5 (Preferred,) including day-use parking and campgrounds.

Concern 291: The NPS should address equine user parking needs by increasing parking for stock/horse trailers.

I horse camp and day ride frequently in Wawona since I live near Yosemite. Parking a horse trailer can be challenging, but the trailhead parking on Chilnualna Falls Road for Alder Creek Falls is large enough to accommodate a number of trailer rigs and autos belonging to hikers. The plan proposes a "fire station" at that site. I am not in favor of changing this parking area.

(Individual; Correspondence #434)

The DEIS goes into much detail about the "Capacities for Camping and Parking" though does not describe in any detail or discussion to address equine user needs. There is no consideration of the large stock/horse trailers that are required to haul stock to and from the park. Parking at trailhead and camping areas for stock/horse trailers is not addressed in the DEIS. There is no discussion of the quantity of or the need for increased horse camping even though the need is increasing and will do so into the future... BCHC believes there is a significant need for the NPS to address the needs of equestrians in this DEIS regarding parking and camping access.

(Individual; Correspondence #1983)

The DEIS analysis of "Capacities for Camping and Parking" fails to address equine user needs. There is no consideration of the large stock/horse trailers that are required to haul stock to and from the park.

(Individual; Correspondence #2912)

Response: Equestrians currently enjoy access to Wawona Stock Camp, Bridalveil Creek, and Wilderness areas that compose 95% of the park. Oversized vehicles (including trucks with horse trailers) may park at Yosemite Lodge and at the concessioner stables. It is not otherwise feasible to designate special parking spaces for exclusive use by equestrians.

The proposed location of the fire facility in Wawona has been relocated from the Alder Creek trailhead to a nearby location, so equestrian and backpacker parking will remain available.

Concern 292: The NPS should include additional detail in the plan about how much of the current parking inventory in Yosemite Valley is used for administrative purposes.

Employee numbers remain a shell game. The preferred alternative proposes in-Valley housing for 1,136 employees of which 972 work for the concessionaire ; it is unclear how many of the remainder are employed by the Park Service or in the category of "other." One would assume that these in-Valley employees are assigned a parking space adjacent to their living quarters and are therefore not

competing with visitors for the precious few day-visitor spaces; however, that assumption may be faulty since the DEIS parking inventory does not appear to include under 'other' the proposed 78 new employee parking spaces at the Lodge, the 164 employee spaces at Curry, or whether the 50 employees at Lost Arrow have any parking spaces at all'raising the question whether these nearly 300 employees will be competing with day visitors for parking. Even more troubling, according to the DEIS, in 2010 the concessionaire employed 1800 and the Park Service employed 1123'that's an additional 2,000 employees unable to live in the Valley; granted, employees are stationed park-wide, but the question remains'how many of these nearly 2,000 employees commute to the Valley and where will they park. So what is the REAL number of spaces under "other" and how many of those are for residential use which would leave how many for administrative use...??

(Individual; Correspondence #1617)

While parking is a major issue we could not find the numbers that indicate how much of current parking is taken up by employees of the Park Service and concessionaire.

(Business; Correspondence #2197)

Response: The number of parking spaces dedicated to administrative use is enumerated in multiple places in the MRP/FEIS. In "User Capacity and Visitor Use Management" (Chapter 6), each type of use (visitor and administrative) is discussed by segment, and the respective capacities are listed. Also, in "Alternatives" (Chapter 8), where this information is relevant, the number of parking spaces for employees is listed in the discussion of Employee and Administrative Use sections.

Concern 293: The NPS should re-establish previous parking areas in order to address parking demand.

please consider reinstalling the Yosemite Falls Parking Lot to alleviate the parking problem currently being experienced at the Lodge. People that want to visit the Falls by car will not park in the Day Use Parking area, but rather often park at the Lodge. This has made it very difficult to find a parking space if you are staying at the Lodge, which was NEVER a problem prior to the removal of the Yosemite Falls parking lot. What it actually did was force the need to increase the day use parking area near Yosemite Village, which removed a pristine area near the Merced River and turned it into a Parking Lot. Essentially you restored one meadow near Yosemite Falls and turned another meadow into a Parking Lot-how did this help anything?? I urge you to reconsider putting this parking lot back in place-it wasn't hurting anything in the first place!

(Individual; Correspondence #2463)

Response: The Yosemite Falls parking area was a congestion hot spot that was eliminated through implementation of the Yosemite Falls trail project. The parking area was utilized primarily by busses and soundly criticized by visitor use surveys and comment letters. After the removal of approximately 200 lodging units following the 1997 flood, Yosemite Lodge was left with a surplus in parking spaces. Visitors now walk a greater distance from parking spaces, but the viewing area and visitor use experience has been vastly improved at Yosemite Falls.

Other parking areas have been eliminated to protect resources, or in places where private vehicles are prohibited, and the transportation system changed to allow access only by free shuttle busses.

Concern 294: The NPS should not eliminate roadside parking because it allows for spontaneous visitor experiences.

In summary, the only specific objections that I have are the potential for the extra road side fencing to impact visitors looking to park close to locations of interest for viewing natural phenomenon.

(Individual; Correspondence #44)

On the other hand, there should still be opportunities for roadside parking in various areas to allow hikers, climbers, and photographers to get out and wander more easily. The spontaneous ability to pull over and explore (after, for example, spotting a surprising view or quick photo opportunity) is an important part of many visitor's experience.

(Individual; Correspondence #708)

Through the years, there has been continual removal of roadside parking. This affects the ability to spontaneously stop to take a picture or look at wildlife and the scenery. Where this option has been removed, cars stop in the road which is dangerous and, can cause traffic jams. Also, removal of road side parking is not always a deterrent for people going into the meadows.

Ansel Adams said that photography combined serendipity and immediate technical recall. Two of his most famous pictures - Moonrise and Early Morning Merced River, Autumn would never had been taken if he could not have suddenly pulled off the road to capture the images.

Where road side parking is eliminated I would prefer that fencing or rocks be used to prevent parking. If curbs are more cost effective, then the concrete should be stamped so it appears to be natural rock.

(Individual; Correspondence #2460)

Response: The *Final Merced River Plan/EIS* does not propose the universal removal of all roadside parking In fact, Alternative 5 (Preferred) maintains about 25% of the roadside parking in East Yosemite Valley and almost all of the roadside parking in West Yosemite Valley. Roadside parking is proposed to be removed in locations where it conflicts with Biological ORVs (Sentinel Drive and Northside Drive along Cooks Meadow) or traffic circulation efficiency (Southside drive between LeConte Memorial and Stoneman Bridge). Roadside parking would be retained in key viewing areas (i.e. along Southside Drive to view Yosemite Falls)

Concern 295: The NPS should consider instituting a parking fee for vehicles in limited, key locations in Yosemite Valley during periods of peak demand.

I recommend that the park analyze what benefits, if any, would be realized by imposing a modest parking fee for vehicles utilizing parking in limited, key locations in Yosemite Valley during periods of peak demand. I am not suggesting that parking meters be installed at hundreds of parking spaces, however, I do feel that a for-fee parking system at locations such as Camp 6 (Valley Day Use parking lot) would help to create turn-over of the most highly demanded parking spaces in locations where visitors access the visitor center and concession facilities. Park staff, working in concert with individuals who specialize in developing systems such as this could determine the optimum fee for the optimum time period to achieve the desired result of allocating the limited supply of parking spaces.

(Individual; Correspondence #2133)

Response: Congestion pricing and central business district parking rates have been successfully implemented in cities, where visitors have a broader range of parking, transit and time-flex options. The purpose and need for metered parking within a national park is difficult to justify when visitors have already paid an admission fee and have nowhere to park but day-use areas and attraction sites (all of which can be described as "key locations").

Concern 296: The NPS should establish small, dispersed parking areas that connect to the shuttle system.

Was there ever any discussion of small, informal, dispersed lots inconspicuously sited throughout the Valley with access to in-Valley shuttle service??

(Individual; Correspondence #1617)

Establish small, dispersed, unobtrusive parking areas connected to fast, friendly, free in-Valley shuttle service.

(Individual; Correspondence #2015)

Response: Over the past 50 years, park managers have established existing parking areas in the context of natural resources values, protected areas and visitor use patterns. Proposed parking area expansions occur primarily where resources have been disturbed in the past. The shuttle system is intended to connect "the dots" of existing parking areas, rather than serve numerous, smaller and disparate parking facilities.

Concern 297: The NPS should provide additional parking in order to address safety concerns resulting from informal roadside parking.

And more parking is needed. The roads are often "parked" on both sides in unorderly ways making both bus and car travel difficult and dangerous.

(Individual; Correspondence #2122)

Response: The NPS acknowledges that incorrectly parked cars along roadsides can significantly impact the flow of traffic along roadways. For this as well as other reasons, the *Final Merced River Plan/EIS* relocates many parking spaces from the roadside to formalized lots where parking is safer for pedestrians and is more efficient for traffic circulation.

Concern 298: The NPS should re-route Northside Drive to the south of Yosemite Lodge and shift the parking to the north side of the road.

Yosemite Lodge Parking Area – I propose rerouting Northside Drive to the south side of the Lodge. To do this, a portion of this proposed parking would need to shift north to the present location of Northside Drive. Shifting the parking north may interfere with the shifting of Camp 4 camping to the south, which I propose in another comment. If this is the case then I propose to increase the proposed visitor parking in the West Valley to make up for any losses in this location.

(Individual; Correspondence #1690)

Response: This concept was presented and evaluated under the Yosemite Valley Plan and Yosemite Lodge Area Redevelopment Project Environmental Assessment. The suggested roadway realignment was cited as one of the underlying causes for concern in subsequent litigation. The YVP and YLARP EA were rescinded in the Settlement Agreement of 2009.

Concern 299: The NPS should designate the proposed El Portal remote parking area for administrative use, and provide employee shuttle service to Yosemite Valley.

the 200-car El Portal lot would be better served as an employee lot with financial and administrative responsibility shared between the Park Service and the concessionaire to provide frequent employee shuttle service to accommodate the variety of shift schedules

(Individual; Correspondence #1617)

Response: The new remote parking area in El Portal will be available for both visitor use and employees and will have regular shuttle service to Yosemite Valley. Dedicating this lot for administrative use only and requiring shuttle service would be is inefficient and cost-prohibitive. Rather, employees are encouraged to participate in incentives offered through regional transit opportunities.

Concern 300: The NPS should detail specific mechanisms that will be used to prevent employees from parking in visitor day-use parking spaces in Yosemite Valley.

> *... what mechanisms will be employed to prevent employees from parking in day visitor spaces?? Informal Park studies as recently as 1999 revealed that more than half of existing day-visitor spaces were used by NPS and DNC employees. A 1992 Draft Housing Plan (never finalized) prepared as a supplement to the 1980 GMP revealed "an estimated 1,500 employee vehicles are parked in Yosemite Valley" and that "there were concerns expressed that some of these employees directly compete with visitors for day use parking."*
>
> (Individual; Correspondence #1617)

Response: During the development of alternatives, planning staff was careful to ensure that parking calculations accurately accounted for the amount of parking needed for the number of employees required to provide the level of service envisioned for each alternative. Park planners count those parking spaces separately from visitor parking spaces. This process ensures there will be adequate parking spaces for employees to use, so that this administrative use will not compete with visitor parking.

Concern 301: The NPS should incorporate additional detail in the EIS to clarify how and when transportation fees, remote parking, and parking reservation requirements would be implemented.

> *the DEIS leaves the door open for future erosion of day-visitor parking: "The NPS would monitor vehicles at one time annually for the first three years of implementation. Implementation of the plan may change the configuration and the baseline for parking supply may have to be adapted to account for these infrastructure and associated behavioral changes" (page 5-129). The DEIS also refers to "triggers" that would take place IF "conditions reached the point where day use visitation to the East Yosemite Valley from private vehicles exceeded the parking availability, and formal traffic diversions at El Capitan Crossover were instituted for 14 days or more during the summer season for 2 consecutive years" (page 8-252). Yet on page 9-868, the text clarifies that visitors who opt for the shuttle will "not be subject to transportation fees, parking in remote lots, or parking reservation requirements"' as though the subject of transportation fees, remote lots, and day-use reservations is a "done deal." The Comprehensive River Value Analysis openly states that with Alternative 5 (page 8-445) there is a "reduction in available day-use parking, and implementation of an East Yosemite Valley Day-use Parking Permit system." It seems the word "trigger" is a misnomer and is being used only as a way for the Park Service to buy time to develop a policy for fees, parking reservation requirements, etc.*
>
> (Individual; Correspondence #1617)

Response: Defining how and when a parking permit or reservation system would be implemented is beyond the scope of this plan and would require additional planning, including a public process. However, park planners have outlined some of the characteristics or parameters that would be considered during the planning process for a day-use parking permit. These include: seasonality, daily hours, primary and secondary allocation mechanisms, timing of availability, compliance, fees (and the potential to combine with park entrance fees), and overnight and employee parking passes. This discussion is included in “User Capacity and Visitor Use Management” (Chapter 6), “Alternatives” (Chapter 8), and “Visitor Use and User Capacity Technical Report” (Appendix S).

Concern 302: The NPS should not consolidate parking into large lots because that will increase visitor's perception of crowding.

> *The DEIS openly acknowledges that large parking lots increase congestion and enhance the visitor's perception of crowding. So why does the proposed alternative support significant consolidation of parking with the expansion of Camp 6 to 850 spaces ..., a new lot of 300 spaces west of Yosemite Lodge, and a 100-car lot at Taft Toe? Don't such Disney-style lots fuel the perception of crowding, perhaps targeting them for future reduction or even elimination under the pretense of visual blight, congestion,*

and deterioration of natural resources as a result of too many people/vehicles in one place at one time (PAOT/VAOT)??

(Individual; Correspondence #1617)

Response: There are several different types of parking in Yosemite (roadside, small lot, and large lot), and each type has advantages and disadvantages. For example, larger lots have some scenic and perceived crowding impacts in comparison to smaller lots, but they are more efficient and have fewer impacts on traffic congestion, particularly in a one-way road system where most drivers are first time visitors. Alternative 5 (Preferred),revised in the MRP/FEIS has a carefully considered combination of parking types in different locations, which does provide centralized parking in the Yosemite Village area for the majority of day users. Site planning and landscaping will be used to enhance the aesthetics of larger parking lots, and all designs will adhere to the "A Sense of Place" design guidelines for Yosemite Valley.

Concern 303: The NPS should not formalize any additional parking areas or trails with pavement.

I oppose constructing a new 50 space parking lot east of the Ahwahnee Hotel, formalizing (i.e., paving) a 190 space "wilderness" parking area east of Curry Village, and reconstructing (i.e., paving) the Valley Loop Trail. If nothing else changes, the NPS must stop laying down pavement in Yosemite Valley.

(Individual; Correspondence #2273)

I do not believe that more currently undisturbed land should be paved over for parking, re-direction of traffic roads, new camp grounds and paving of trails - like the Valley Loop Trail - nature can still be experienced in relative silence and solitude. I believe that there should be increased opportunity to "slow people down and involve them to learn about and to appreciate and experience the park.

(Individual; Correspondence #3561)

Response: In order to manage fugitive dust and storm water runoff, the NPS will be required to use asphalt or alternative pavement methods in all parking areas and roadways, such as epoxy resin binders, soil cell dividers, or surfactants. The final parking area design, surfacing, and construction methods are subject to review and approval by permitting authorities other than the NPS, such as the local Air Quality Management District and Regional Water Quality Control Board.

Concern 304: The NPS should clarify the number of existing parking space numbers in Yosemite Valley and what is proposed in the Alternative 5 (Preferred), but not include parking in El Portal in these figures.

Because of uncertainty as to the accuracy of present parking figures, it is unclear whether the proposed amount of new parking would be enough to compensate for the loss of old parking. Enough replacement parking should be provided so that there is no net reduction in the amount presently available. And we strongly believe that like should be compared with like. The amount of parking proposed for Yosemite Valley should be compared with the amount of parking presently available in Yosemite Valley. It does not make sense to consider parking which is half an hour away (e.g. Abbieville) as being comparable to parking which is in Yosemite Valley. It is a drastically different situation, starting with the fact that a new shuttle service would be required.

(Individual; Correspondence #3604)

Response: Parking space numbers are listed in "Alternatives" (Chapter 8) in their respective segments. In some cases, parking is developed in one location (El Portal) but the visitor use associated with that parking occurs in another part of the corridor (East Yosemite Valley). Where the document discusses parking inventory, it refers to the actual number of spaces on the ground in a specific segment. Parking spaces associated with visitor capacity in Yosemite Valley may be a different number than the parking inventory. This

is because people who use the remote lots like the one proposed in El Portal under Alternative 5 (Preferred) or in the West Valley under Alternative 6 also enter East Yosemite Valley and therefore contribute to the maximum East Valley user capacity. To clarify what parking is being enumerated in the parking inventory table totals, the *Final Merced River Plan/EIS* has included detailed footnotes where this situation applies.

Concern 305: The NPS should retain all current parking lots in El Portal for employee and community facility parking.

> *Re: Segment 4, El Portal. (p.8-72) Keep all current parking areas. The MPR mentions creating a valley oaks recruitment area in the vicinity of Odger's, including the adjacent parking lots. With the exception of the lower lot at the east entrance to Odger's,these parking lots are essential to the community in the use of the El Portal Community Center (Clark's Hall). Community events, park training, weddings, receptions and even park service and Yosemite Conservancy employees require the use of the parking lots for employee and govt vehicles. Removing these parking lots would greatly impact the use of the community hall which is listed as a vital community service in the MPR .*
>
> (Individual; Correspondence #2125)

Response: The MRP has not proposed to eliminate the existing parking areas of El Portal village under Alternative 5 (Preferred). However, it is unclear whether the concern extends to unimproved, level lands in locations that are neither intended nor appropriate for parking use. Parking will be prohibited within the drip-line of valley oaks in the vicinity of the existing bulk fueling facility

Concern 306: The NPS should add more parking for people with disabilities.

> *Also, as a Boomer, there will be lots of people who are elderly and need special help. In fact, please increase the parking for the disabled. Granted, we should not love Yosemite to death, but there are many of us who no longer can camp as we once did. Beauty belongs to everyone, not just the able-bodied.*
>
> (Individual; Correspondence #2732)
>
> *Many more "handicap" parking spots at hotels, restaurants, stores and around the park. (Now always full)*
>
> (Individual; Correspondence #29266)

Response: Any new parking facilities in Yosemite will meet or exceed the number of accessible parking spaces required by the Architectural Barriers Act. The provision of accessible parking spaces is evaluated in the implementation of all park improvement projects. For example, accessible spaces were recently established on a concrete pad along with the renovation of historic cabins-with-baths in Curry Village. In recent years, the park has retrofitted the Curry Village tent cabin complex and Housekeeping Camp with accessible paths of travel and parking spaces. Additionally, to assist visitors with mobility disabilities, all of the parks free shuttle buses are accessible and provide transport to hotels, campgrounds, restaurants, and visitor attractions in east Yosemite Valley.

Concern 307: The NPS should limit the number of vehicles that may enter the Valley based on the number of existing parking spaces in the Valley, rather than building new parking areas.

> *One problem in evaluating the proposed Taft Toe "parking area" is that its true purpose has not been defined in the DEIS where it is described either as overflow or day-use parking for 100 cars and/or as a means to control congestion in the East Valley during peak periods to prevent more vehicles from adding to the congestion (Draft MRP, at 8-263). ... If this area is to be used as a "checkpoint" to control entrance to the Valley by directing excess traffic to the nearby El Cap crossover (although this would mean two-way traffic on a short stretch of Southside Drive), then no visitor parking spaces would be necessary. If the purpose of this parking area is to be a staging area where people can park and then enter the Valley via the shuttle, a much larger parking area would likely be required. The real purpose*

of the "overflow" or day-use parking area needs to be fully disclosed and understood in evaluating the impact of the draft MRP on the river's ORVs.

(Individual; Correspondence #8330)

... consistent with the plan's user capacities and WSRA, would be to limit the number of vehicles that may enter the Valley as a function of the number of parking spaces in the Valley rather than building a new parking lot in the West Valley Scenic river segment at Taft Toe.

(Individual; Correspondence #8330)

Response: The MRP capacity management program (as described in the *Final Merced River Plan/EIS*) limits how many private vehicles are allowed into East Yosemite Valley at any one point in time. This number is calculated based on available parking in any given alternative as well as the roadway capacity. Alternative 5 (Preferred) replaces parking removed because of conflicts with ORVs or transportation system performance, and these new parking areas are designed to concentrate parking to be more efficient for visitors. Limiting vehicles based on the current (No Action) configuration of parking spaces in Yosemite Valley would be a less effective strategy, as the current parking configurations make finding appropriate parking challenging and time consuming for the visitor. A thorough discussion of how the MRP manages vehicle capacity can be found in "User Capacity and Visitor Use Management" (Chapter 6).

Concern 308: The NPS should redevelop the concessioner stable area for a new parking lot.

Utilize the vacated space at the old stables site for additional day use parking spaces. (Increases parking capacity and raises day use visitor level).

(Individual; Correspondence #2212)

Response: The NPS has opted to retain the concessioner stable in its existing location as explained in the response for Concern 471.

Concern 309: The NPS should the use parking and facilities inventory numbers from before the 1997 flood as the baseline for comparison against the alternatives.

Even though there is no documentation, we know that around 600 parking places were taken out in front of the Visitor's Center, and many removed by simply placing boulders along the turn-outs. We have heard estimates of 3,000-6,000 fewer parking spaces. You should be using the pre-97 flood numbers as a baseline to accurately gauge what is added and what is being taken away. Limiting access to fix a problem that you created is not the answer.

(Individual; Correspondence #2325)

Response: NPS Management Policies require the park to use the best available scientific data in decision-making. The NPS has evaluated data related to parking and facilities published between 1980 and 2012. Park planners chose a reasonable baseline given the best available data that is most relevant to the planning effort. Alternatives are compared with conditions at the time of designation (1987) and in 2011, when robust data related to the planning effort were collected. Assertions that the park had thousands more parking places prior to the 1997 flood are incorrect, and would not be a legal or appropriate basis for comparison with the proposed range of alternatives.

Concern 310: The NPS should revise the DEIS parking inventory tables to show the actual number of spaces in each segment, rather than including out-of-valley parking areas in the total for Yosemite Valley.

The DEIS claims that overnight visitor capacity in Segment 2 is based on occupancy in available accommodations (i.e., lodging, camping). The GMP amendments then clearly spell out what those

occupancy limits are in each of the lodging and camping locations. The DEIS further states that day-visitor capacity in Segment 2 is based on parking availability. Therefore, there should also be an Amendment establishing the minimum number of day-visitor parking spaces that will remain in Yosemite Valley -- not satellite lots that support day visitation in Yosemite Valley, but day-visitor parking spaces actually IN Yosemite Valley. Without this specification confirming private vehicle access IN Yosemite Valley for day visitors, the Amendment claiming "no ultimate exclusion of private vehicles" as currently stated on page A-13 is meaningless

(Individual; Correspondence #1617)

Response: Please see the response to Concern 305.

Concern 311: The NPS should ensure remote parking in El Portal is supported by adequate levels of public transit.

The Sierra Club supports the proposal to increase parking at El Portal as long as it is supported by adequate public transit to the Valley.

(Individual; Correspondence #1818)

Response: The El Portal Remote Parking Area will be serviced by shuttle service to Yosemite Valley. The description of transportation options in Alternative 5 (Preferred) has been updated to reflect this change.

Transportation—Locations

Concern 312: The NPS should consider constructing parking structures outside of the park in surrounding communities.

It is time to begin a dialogue addressing the issue returning the valley to its natural state. Start by encouraging visitors to shuttle to the valley by severely limiting parking and driving within the valley. Staging areas can be developed at El Portal and Glacier Point. A case can be made for staging near Mariposa or Wawona, utilizing electronic transit (monorail) to shuttle visitors in and out of the Valley.

(Individual; Correspondence #19)

Take the 230 million dollars PLUS and buy 20 plus acres in each area of Fresno, Madera, Manteca, Lee Vining and other ares that people would enter Yosemite.

(Individual; Correspondence #37)

I think large parking lots should be set up in Mariposa,the top of priests grade,Oakhurst and Lee Vinning to shuttle people into the park. This would relieve park congestion and improve the quality of the park. I think the amount of cars in the park is the number one problem to deal with.

(Individual; Correspondence #57)

Response: The recommendation constructing parking structures outside of the park in surrounding communities is beyond the scope of what this plan can and does address. The NPS would need to work with the surrounding communities and federal agencies on a collaborative planning effort with a stand-alone compliance process to determine the need of and feasibility for parking staging areas outside Yosemite National Park. For additional information, please also see the response for Concern 285.

Concern 313: The NPS should increase region-wide shuttle/bus service to transport visitors to the park.

Bus transit from Fresno/Merced, etc should be increased

(Individual; Correspondence #16)

Response: The Merced River Plan does propose increases to the regional transportation service on all the major road corridors including Highway 140 (Merced/Mariposa), Highway 120 East (Mammoth Lakes), Highway 120 West (Sonora/Groveland), and Highway 41 (Fresno/Oakhurst). For additional details about the frequency of buses on these corridors please see MRP, "Alternatives" (Chapter 8), Alternative 5 (Preferred).

Transportation—Tour Buses

Concern 314: The NPS should mandate clean energy standards for private tour buses.

> *While YARTS is considered as using clean energy for transportation of passengers, many vehicles such as buses used by foreign tourists are not. Some are quite sub-standard. Should we not consider placing a restriction upon "dirty" motor coaches entering the Park?*
>
> (Individual; Correspondence #120)
>
> *Please see the following suggestions.*
>
> *Any bus currently transporting visitors would have to be powered with natural gas, as well as all transit buses in the valley.*
>
> (Individual; Correspondence #1048)
>
> *Require that all commercial tour bus operators immediately turn off their bus engines when they stop at pullouts, overlooks, parking lots, or at lodging facilities.*
>
> (Individual; Correspondence #1287)
>
> *One other issue we have heard of is about the Auto Traffic in and out of the valley which is a pollution issue, but again year after year it seems to be the poorly maintained buses that are blowing out the pollution. Because of Smog Regs on Autos they burn so clean these days that the limitations should be put on all the Travel Buses allowed into the valley.*
>
> (Individual; Correspondence #1641)

Response: As part of its commercial use authorization program, Yosemite National Park requires all private tour buses be in compliance with California air quality standards, including the prohibition against diesel bus idling for more than five minutes.

Concern 315: The NPS should consider limiting private tour buses in Yosemite Valley to reduce congestion and improve visitor experience.

> *An option to reduce congestion might be to reduce the number of authorized tour buses (such as the case in Denali in Alaska.*
>
> (Individual; Correspondence #528)
>
> *ELIMINATE DAY-TRIP COMMERCIAL TOUR BUSES:*
>
> *Please eliminate commercial tour buses day trips in Yosemite. It is appalling that "41 commercial tour buses entered the park each day." The people on tour buses are not experiencing Yosemite. They behave as if they are merely checking off another location on their "we went here" checklist: get off the bus, walk around a little, take a few pictures, get back on the bus. Yosemite (and all other national parks) are not theme parks for people to view from inside a large bus and walking short distances in over-sized groups. Revoke the licenses of these day-trip tour bus operators and allow Yosemite to be enjoyed by visitors who are willing to take more than a few minutes attempting to experience a place that one would spend a lifetime discovering. Tour bus visitors degrade and even ruin the experience of every other visitor.*

Commercial tour buses that involve overnight stays in the park should continue and even be encouraged. These visitors decrease the number of private vehicles involved in overnight stays.

(Individual; Correspondence #2316)

Response: Commercial tour buses are required to park in designated spaces to the west of Yosemite Lodge. Each alternative provides a limited number of spaces for this purpose thereby limiting the number of people at one time that can arrive by tour bus. If use in Yosemite Valley reaches a point where a decline in the condition of the Recreation ORV necessitates management action, adjustments to commercial use/tour visitation patterns may be made. These management actions would seek to alleviate crowding during the busiest times of the day and reduce the number of groups arriving at the same time at any given site. Please see ORV 20 in "River Values and their Management" (Chapter 5) for a thorough discussion of management actions that may be taken to protect the Recreation ORV in Segment 2.

Concern 316: The NPS should increase the number of tour bus parking spaces proposed in the plan.

The number of bus parking spaces should be increased to 25.

(Individual; Correspondence #1888)

Lists 15 commercial bus parking spaces as the current number and keeps the number at 15 spaces. It doesn't take into account the need for additional or overflow bus parking during the summer/fall peak seasons, which can reach over 25 buses. In the past when buses were allowed to park at the old Yosemite Falls parking lot there were 22 spaces available to accommodate buses and large RVs. There should be at least that many space available again to lessen the need for drivers to drive to an overflow lot in the west part of the Valley or El Portal. Bus drivers are limited to 10 hours driving per day, and 12 hours on duty. If they are required to drive to another location it will affect the hours that they have available to drive. Drivers also need to be in an area where they can access food, water shade while they wait for their clients. They are able to do this at Yosemite Lodge now. If buses are sent out of the Lodge area to an overflow area the drivers will need to stay with their buses. They are not allowed to idle their engines for cooling purposes so that would leave them exposed to the heat while they wait for the time to pick up their clients. Buses would then have to drive the Valley loop again to pick up their clients at the Lodge increasing traffic flow. If the main parking lot cannot be reconfigured with the additional spaces consider an overflow lot close to the Lodge with shuttle bus access for the drivers to be able to ride to the Lodge for rest and meals.

(Individual; Correspondence #2125)

Response: The NPS has revised Alternative 5 (Preferred) to propose a total of 22 commercial bus parking spaces west of Yosemite Lodge, which is 7 more than what is provided under existing conditions. In order to keep these parking spaces available for permitees, YARTS drivers will be directed to park public transit busses in the NPS Maintenance Area.

Transportation—Pedestrian Underpass

Concern 317: The NPS should consider alternatives to the construction of the pedestrian underpass, including re-routing Northside Drive, constructing an overpass, or using a temporary stop light.

Yosemite Falls Intersection – The proposal to construct a pedestrian underpass to alleviate pedestrian/vehicle conflicts is the wrong choice. The best alternative would be to reroute the road to the south side of the Lodge as was proposed in an earlier plan. The Park proposes and justifies rerouting the road at the Yosemite Village Parking, then proposes to not reroute the road at the Falls intersection. All the justifications for and against rerouting the road in one location also hold for the other. In fact, the rerouted road at the Village parking would be closer to the river than a rerouted road at the Lodge based on the previous design. The previous design required the relocation of lodging units and parking

lots to be able to place the new road well away from the river. This alternative retains these lodging units and parking lots. I feel it would be better to trade one type of development for another along the river in order to increase the visitor experience at Yosemite Falls. Even though the river is Wild and Scenic, I would bet that the entire world would consider Yosemite Falls to be more significant in this particular location. I believe every effort should be made to improve the visitor experience in the area of Yosemite Falls even if it means causing minor impacts to the river corridor. The previous plan with a rerouted road, relocated parking and a pedestrian promenade from the core of the Lodge to the base of the Falls was far superior to the pedestrian undercrossing and perpetuation of the roadways and vehicle parking this alternative proposes.

(Individual; Correspondence #1690)

The area of the biggest controversy is the proposed pedestrian underpass. This underpass would take up so much room and do so many disturbances to the prehistoric and natural resources located in this area. There has to be another feasible way to get the pedestrians from one side of the road to another. It was suggested that you put in a stop light, even a temporary one for the busy summer months. Or move the bus loading and unloading across the stree where the shuttle stop already is. If the people were dropped off on that side of the road there would be no need for them to cross. This would at least reduce the number of people crossing. It was even suggested that you moved the road to behind the Yosemite Lodge; but you had a lot of reasons why that could not happen. ... The tribe is against the pedestrian underpass period! ... It seems like the Park Service is putting the visitor experience over cultural resource protection.

(Tribal Government; Correspondence #2545)

We have consistently opposed the idea of pedestrian underpasses, and this is for a number of reasons.

(1.) Major structures should be avoided because, once built, they tend to be around for a very long time.

(2.) If infrastructure is kept on the surface, it is much easier to relocate as experience and changing needs might dictate.

(3.) Disturbance of the earth opens the door to possible complications. The proposed underpass is in an area which was intensely used by Native Americans, and it seems likely that cultural problems will be encountered.

(4.) Underpasses collect water, dirt, and debris. They are a maintenance problem. In the winter, the shaded tunnel will be conducive to ice accumulation, and there will be a safety problem.

(5.) Tunnels and underpasses are noted for harboring criminals bent on attacking others. Tunnels are not as safe as surface routes.

(6.) Drawings of the proposed underpass indicate a lack of sensitivity to the fact that this is Yosemite, and things are supposed to look natural.

A pedestrian-operated signal light to stop cars could be simple, cheap, and easily changed or removed...We strongly feel that a properly designed signal light would be less intrusive than the proposed underpass.

(Individual; Correspondence #3604)

We also note strong tribal objections to the impacts the proposed Yosemite Lodge underpass could cause to archaeological sites in this ORV and encourage NPS to address tribal concerns by reconfiguring this project. However, to the extent that the MRP will improve the condition of other archeological resources through additional management techniques, site avoidance and monitoring in consultation with tribes, we are in favor of those approaches.

(Civic Group; Correspondence #8329)

Response: The MRP/FEIS has been revised to eliminate the proposal for a pedestrian underpass at Yosemite Lodge. Under Alternative 5 (Preferred), no pedestrian underpasses are proposed. The pedestrian/vehicle conflicts on Northside Drive between the Yosemite Lodge area and the Lower Yosemite

Fall area will be addressed in a tiered NEPA/NHPA compliance effort. The park will consider options such as a grade-separated pedestrian crossing (overpass or underpass), a traffic light, minor realignments of Northside Drive, or relocation of the on-grade crossing. The park will evaluate the cultural, physical, biological, and economic tradeoffs of each option.

Concern 318: The NPS should design the proposed underpass in consultation with the Native American community.

> *And having participated in traffic control at the Yosemite Falls/Northside Drive intersection, the proposed underpass would be a tremendous improvement if it can be closely coordinated with the Native American community as well as guarantees it will be engineered correctly.*
>
> (Individual; Correspondence #1618)

Response: Under the revised Alternative 5 (Preferred), no pedestrian underpasses are proposed. The pedestrian/vehicle conflicts on Northside Drive between the Yosemite Lodge area and the Lower Yosemite Fall area will be addressed in a tiered NEPA/NHPA compliance effort. The plan-specific programmatic agreement (Appendix I) will identify necessary consultation efforts with traditionally associated American Indian tribes and groups for specific projects and types of projects.

Concern 319: The NPS should dismiss the proposed design for the pedestrian underpass from consideration to avoid impacts to cultural resources.

> *If the underpass "must" go in, at least move it to someplace where it will not impact resources. This is a very large prehistoric Indian village site. The site has a very deep deposit with the most intense occupation over 2,000 years ago. Section 106 says the first option should be "avoidance". It appears that avoidance was never considered when this project was developed. Otherwise this location would have been removed from the beginning. A lot more testing should be done to figure out the site boundaries. Usually when there are sites located very near each other, it turns out that they are really one large site and not a bunch of individual small sites. The Tribes feel that putting this underpass in this location would be very disrespectful.*
>
> (Tribal Government; Correspondence #2545)

Response: Under the revised Alternative 5 (Preferred), no pedestrian underpasses are proposed. The pedestrian/vehicle conflicts on Northside Drive between the Yosemite Lodge area and the Lower Yosemite Fall area will be addressed in a tiered NEPA/NHPA compliance effort. The park will consider options such as a grade-separated pedestrian crossing (overpass or underpass), a traffic light, minor realignments of Northside Drive, or relocation of the on-grade crossing. In accordance with the National Historic Preservation Act (NHPA), the NPS must consider avoidance of adverse effects which includes retention of all irreplaceable cultural resources including culturally-significant resources. This consideration is conducted through consultation with the State Historic Preservation Office, the Advisory Council for Historic Preservation, traditionally-associated American Indian tribes and groups, and other consulting partners. It is a priority of the NPS, its consulting partners, and the public to protect historic properties under NHPA, the Organic Act, NPS Management Policies, and Director's Order 28 among other laws and policies (see "Affected Environment and Environmental Consequences" [Chapter 9]—Historic Buildings, Structures and Landscapes, Regulations and Policies). However, the agency may determine that physical destruction or damage to all or part of a historic property is unavoidable in order to meet the needs of the plan.

Transportation—Roundabouts and Traffic Circles

Concern 320: The NPS should site and design the Yosemite Village Day-Use Parking Area traffic circle/roundabout to avoid impacts to existing resources.

> *The [Alternative 5] roundabout is noted to have a local effect on the hydrologic processes of the river (8-433).*
>
> (Individual; Correspondence #2211)
>
> *We do know that the diameter of the round-a-bout is 60-feet which mean quite a number of very old mature trees will be removed. You can replant more trees but it would take 5 generations for those trees to mature to the size of the ones you are planning to remove. It would seem you could incorporate the larger mature trees into the plan and not remove them.*
>
> (Tribal Government; Correspondence #2545)

Response: Improvements proposed for the Yosemite Village Day-use Parking Area have been evaluated in the EIS, including proposed areas of disturbance. While every effort will be made to preserve existing trees and important vegetation within the proposed parking area, traffic safety and design considerations, such as intersection alignments, sight distance and levels of service will determine whether specific trees can remain or must be removed.

The proposed transportation improvements would not affect hydrology in the bed and banks of the river, or in the 150-foot riparian buffer. The comprehensive River Value Analysis in "Alternatives" (Chapter 8) states that: "mitigations would protect sensitive areas from staging impacts such as compaction and erosion. While the traffic circle and realignment of Northside Drive may affect the hydrologic processes of the alluvial river locally, the ORV would be protected segmentwide."

Concern 321: The NPS should construct additional roundabouts at key intersections in the park to manage traffic.

> *I'd also like to suggest that the Park consider using roundabouts/traffic circles at key intersections, in place of the existing stop signs. For example, at the main intersection south of Yosemite Village. They work very well in other places, may reduce vehicle fumes, and there are ways to manage incoming traffic from one or other direction if the flow becomes a problem.*
>
> (Individual; Correspondence #2068)

Response: There may indeed be locations where roundabouts would help ease traffic congestion in the park, but only one is proposed in concert with specific site improvements at Yosemite Village at this time.

Transportation—Bicycle

Concern 322: The NPS should expand multi-use trails to west valley.

> *Install bike lanes or a two way cycle-track (two way protected bike lane) along one of both access roads between east end of the valley and El Capitan/Bridal Veil Fall.*
>
> (Individual; Correspondence #1674)
>
> *The things we enjoy most about Yosemite Valley are the bike and walking paths, and rafting. We would like to see more bike paths especially west of Yosemite Lodge. Right now it is too dangerous to ride bikes along the roads leading out of the valley.*
>
> (Individual; Correspondence #2103)

I also believe that more bike lanes or paths are needed to reduce traffic, especially towards the western end of the valley.

(Individual; Correspondence #2547)

Response: Expansion of multi-use trails to West Yosemite Valley from East Yosemite Valley was considered but dismissed from further analysis due to resource and engineering constraints. Specifically, there are a number of locations along the Valley Loop Trail that would require substantial widening and grading to accomplish both safety and accessibility standards for a multiple use trail (e.g., wide enough to allow two opposing wheelchairs or bicyclists to pass without collision). In non-developed areas, outdoor recreation guidelines require paths of travel to not exceed a 5% running grade. There are also a number of ephemeral creek crossings (e.g. Ribbon and Bridalveil Creeks) that would require construction of foot bridges through braided creek channels.

Concern 323: The NPS should expand Yosemite Valley's bicycle paths, including two-way bike lanes, to improve cycling options.

As part of encouraging more environmentally friendly activities, I think that the Yosemite Valley needs to do more to both enable and encourage people to use bikes. The introduction of a dedicated bike lane with a rumble strip dividing bikes from cars might also warrant investigation but I do not know if the roads are wide enough for this.

(Individual; Correspondence #44)

AND increase the network of bike paths or, at least, make bike lanes going both directions on all roads (one and two-way).

(Individual; Correspondence #1255)

Response: Expansion of Yosemite Valley's bicycle paths, including two-way bike lanes was considered but dismissed from further analysis due to resource and engineering constraints. The greatest potential for expansion of bike paths is into West Yosemite Valley which would require substantial improvements to the Valley Loop Trail (such as paving) or widening of the Valley Loop Road to accommodate a safe bicycle travel lane. Road widening would further encroach on meadows and streams and result in altered hydrology and impacts to vegetation.

Concern 324: The NPS should promote bicycling as an alternative form of transportation in its planning efforts.

I wish that the Park Service would do as so many of are cities are doing by incorporating bicycles as a means of transportation and recreation in all future planning, and encouraging their use by making cycling safer and easier.

(Individual; Correspondence #1254)

The plan for Yosemite...should emphasize more alternative forms of transportation such as bicycling and public transportation/shuttles. Increasing car capacity in our National Parks is counteractive to the goal of preserving them for the enjoyment of generations to come. Getting people walking or on bikes and out of their cars should be a goal of the NPS.

(Individual; Correspondence #1673)

Many cities with significant traffic problems, in both the U.S. and throughout the world, our attempting to make bike rentals more convenient and widespread, as a traffic management strategy. Removal of bike rental facilities in Yosemite Valley runs counter to this prevalent worldwide trend.

(Individual; Correspondence #1960)

Response: Bicycle rentals will remain available in Yosemite Valley, though the facilities will not be located in the river corridor.

The role of bicycles in park transportation was deliberated as part of the planning process. Surveys indicate that approximately 12% of park visitors use or rent a bicycle during their visits. Many visitors bring their own bicycles to the park, and a statistically insignificant number (less than 3%) actually enter the park on a bicycle. The overwhelming modes of transportation in and out of Yosemite National Park are private vehicle (62%), rental vehicle (27%) and bus (9%). The bicycle does indeed serve a useful purpose within East Yosemite Valley (including daily commuting by employees), but it does not reduce the demand for private vehicle access and adequate parking.

Concern 325: The NPS should delineate bicycle lanes within existing roadways.

> *Bicylcing is an important visitor activity in YNP. YNP needs to provide access to recreation for bicylists. Park Roads lack adequate bicycle lanes. If YNP cannot provide bicycle lanes, then YNP should install signage requiring motorists to "share the road".*
>
> (Individual; Correspondence #2079)
>
> *Also planning needs to include the use of bicycles and dedicated bicycle lanes that use the existing roadways - new bike lanes should not be built at the sacrifice of land.*
>
> (Individual; Correspondence #2090)
>
> *The AAC strongly encourages biker-friendly solutions to help minimize traffic congestion and increase public safety. Currently, a climber who rides his or her bike to the Meadow, or any other location downstream of Camp 4, must return Westward along Southside Drive, in order to obey the law. In daylight, this is a dangerous experience with many drivers routinely exceeding the speed limit on the road as they arrive into or return to this busy area of the park. After dark, the dangers of bike riding in this area are exacerbated. No bike path exists in the area to avoid motorists, and there are many semi-blind, high-speed curves, drainage ditches, drop-offs and other hazards. Adding designated bike paths or lanes and enforcing vehicle speed limits are highly recommended.*
>
> (Individual; Correspondence #3694)

Response: Please see response to Concern 323.

Transportation—Eliminate/Reduce Private Vehicles

Concern 326: The NPS should eliminate all private vehicles from Yosemite Valley.

> *I, personally, would like to see a ban of all personal vehicles in the valley; all access being provided by bus, possible railway, or by foot.*
>
> (Individual; Correspondence #2)
>
> *While increasing visitation and enjoyment of Yosemite for all people is desirable, if it can be accomplished without excessive impact on the natural resources, NPS must take a serious leadership role in reinventing how high human density visitation is accomplished with the minimum environmental impact on the special places they manage. I guarantee you the responsible solution does not involve having a car parking space in the valley for one out of three or four visitors during the peak. Cars and parking lots are a direct detraction from the quality of the environment and their presence must be significantly scaled back, starting soon and ramping down fast. Please be a leader and develop a car free plan for the valley. Don't acquiesce to the automobile. It doesn't belong in Yosemite. Why invite a herd of thousands of non-native metal ungulates that just want to take up space grazing on asphalt. That's not what people come to Yosemite to see, so they can come a different way to avoid seeing it.*
>
> (Individual; Correspondence #16)

Response: One of the goals of the MRP is to continue to provide a variety of quality experiences for visitors. Though the 1980 GMP did call for the eventual removal of all private vehicles from Yosemite Valley, YNP no longer believes that this action is reasonable or feasible given the transportation system that has evolved, and visitor use patterns experienced in the modern era. Rather, the MRP provides a range of transportation opportunities to access Yosemite Valley including shuttles from remote parking, regional public transportation as well as private vehicle access.

Concern 327: The NPS should adopt models used by other parks to reduce or eliminate private vehicles.

> *Cars need to be eliminated from Yosemite NP and replaced with a model such as Zion. To attempt otherwise the resulting solutions can result in the same visitor experiences we have today when reaching gridlock (probably a situation whose frequency can only become worse with increasing visitor populations in years ahead) in addition to the proposed new parking spaces conflicting with maintaining ORVs iconic scenery.*
>
> (Individual; Correspondence #49)
>
> *You must reduce the number of cars. You can do this by imposing restrictions, like at Zion. Cars are only permitted to enter the valley if they have reservations for lodging. There is plenty of shuttle service from the nearby village.*
>
> (Individual; Correspondence #1220)

Response: The NPS has considered the feasibility of developing a park-based transportation system and remote parking facilities similar to those seen at other parks like Zion. Places such as Devils Postpile and Zion are characterized by a single point of entry, pre-existing remote parking facilities, and short travel routes for visitors. In contrast, Yosemite has four entrance stations, with each gateway community a distance of 43 miles or more from Yosemite Valley. The costs of developing, maintaining and operating a park-based transit system are prohibitive, running into tens of millions of dollars each year. Instead, the MRP increases regional transit services and adds some remote parking in El Portal with shuttle service to provide remote parking/shuttle-in opportunities for those visitors who would rather access Yosemite Valley via these mechanisms.

Concern 328: The NPS should consider implementing a car share program such as Zip Car to minimize private automobiles and associated traffic congestion in the park.

> *The technology is now available to completely rethink day use vehicular traffic in the park. A Zip Car type personal transit solution might be considered with plug in hybrids made available at major day use visitor parking areas outside the valley and at lodging/camping parking. If you consider typical visitor use: I drive to Curry or Yosemite village with a day pack. Park the car and it stays there for a few hours then I move it to another part of the Park or one of the groves, park for a few more hours, and head to lodging. Much better I pick up a short trip car, let others use it while I am enjoying the area of the park I am in and pick up another for the next short trip. I can still enjoy the casual stops to look at the animals, or the climbers on El Cap, etc. which is why I want the flexibility of a personal car. But there is no sense at all using up valuable parking for my hike on the mist trail, or my meditation experience at mirror lake. Particularly with the shuttle available as a backup to get to an available car or back to lodging or dinner if demand is higher than supply at peak hours. I think one of the major rental car companies bought out Zip Car, and would jump at the day use franchise. Particularly if it had the only day use cars permitted in the park.*
>
> (Individual; Correspondence #47)
>
> *Day Use Plugin Hybrid Single Trip Rentals. "Zipcars"*
>
> *Implementation: The preferred alternative should reserve close in desirable parking at popular day use areas for this alternative to private cars. Lodging and camping facilities should encourage people to*

leave their private cars parked and use the rentals or shuttles for day use. Again close in desirable parking at camping and lodging areas should be reserved for the rentals. Several commercial rental companies have experience in single trip rentals and I am sure would compete strongly for the concession.

The "overflow turnaround area" should be expanded and used as a staging area for the phase in of the concept. Initially it should be an option, but the preferred parking areas should be a strong incentive for people to park there for the day, and use the rental and/or shuttle alternative.

(Individual; Correspondence #2034)

Response: The Merced River Plan will ensure access by private vehicle to Yosemite National Park. A car share program could be implemented as part of the overall traffic management in the park, but this management decision would be outside of the scope of this plan.

Concern 329: The NPS should reduce the presence of automobiles in an effort to minimize the development footprint in the Yosemite Valley.

Minimize the developed human impact footprint while being bold and inventive to maintain good accessibility and human enjoyment without compromising the natural resources, start by dramatically reducing cars and work on a plan toward a car free Yosemite Valley

(Individual; Correspondence #16)

Response: Although the removal of private vehicles in Yosemite Valley was a goal of the 1980 General Management Plan, the Merced River Plan/ FEIS will amend the GMP. This action would not meet the purpose and need of this plan. Existing transportation networks will not support this option, and construction of new transportation networks to only allow access by public transit would be infeasible from a cost perspective. In addition, the range of alternatives includes actions that reduce crowding and minimize the development footprint in Yosemite Valley but do not require the elimination of private vehicles. Finally, existing modes of travel, including access by private vehicle, provide for a diversity of visitor experiences that are integral to developing direct connections with the river.

Concern 330: The NPS should restrict admittance of private vehicles in Yosemite Valley during peak visitation seasons.

Limit admission of single vehicles on major holidays and the peak visiting months. Encourage bus/shuttle use. Could have parking lots in upper Oakhurst and the El Portal area with shuttles for day use on regular schedules for a minimal charge but preferably free. Zion NP has wonderful transportation in their park and it's FREE and frequent. It is imperative to keep more traffic out of the valley. Don't know if tour busses get a break on admission fees but perhaps they should since they are bringing in many visitors with only one vehicle. Shuttles could run daily or during peak times.

(Individual; Correspondence #209)

The number of private vehicles entering Yosemite Valley should be decreased in the Summer months- May 15 through September 15 instead of being maintained at current levels. The amount of air pollution and energy usage in Yosemite needs to be reduced by at least 10%.

(Individual; Correspondence #771)

Response: On high-use days in the past decade, NPS has occasionally instituted a traffic diversion at the El Capitan Crossover to re-direct incoming traffic away from the East Valley. This action is implemented to avoid gridlock and facilitate emergency vehicle access, and it is triggered by professional judgments about whether day-use parking lots are full or long queues are forming at East Valley intersections. All private vehicles are required to go to other areas of the park during the diversion period (which typically last from

one to five hours). All action alternatives in the MRP would implement a Traffic Diversion System that meets defined capacities, when parking lots are full and before traffic reaches gridlock conditions. The system would limit vehicles at one time in East Valley to 90% of available parking plus the modeled road capacity. NPS will continue to publish traffic forecasts to let people know which days of the summer they might encounter a traffic diversion during peak hours of the day. Additionally, transit service from gateway communities (all alternatives) and shuttle service from the remote lot in El Portal (alternatives 4, 5, & 6) will be provided for those visitors who cannot access East Yosemite Valley by private vehicle.

Concern 331: The NPS should not eliminate private vehicle use within the park because it would inconvenience families with small children, the elderly, and visitors with limited mobility.

> *I also cannot support reduced access to vehicles, which would negatively impact families with small children and the disabled (I have a child with disabilities).*
>
> (Individual; Correspondence #480)
>
> *if you ban cars from the valley, it makes it impossible for families with small children and infants who need strollers, diaper bags, coolers for their food, and a host of other items to ride buses into the valley. They need to have their car in order to visit the valley.*
>
> (Individual; Correspondence #1281)

Response: Please see the response to 329. Also, Alternative 5 (Preferred) in the MRP aims to provide many different mechanisms by which visitors could gain access to Yosemite Valley. The goal of increased transit and shuttle opportunities is to provide a wider range of access types such that no one type needs to be restricted. As a part of the capacity management program, vehicles at one time (VAOT) will be monitored and managed as a direct and efficient tool for managing day-use in Yosemite Valley. Please see "User Capacity and Visitor Use Management" (Chapter 6) – Segment 2 for a complete discussion of the User Capacity Management Program.

Concern 332: The NPS should limit or reduce private vehicles, but not eliminate them entirely.

> *I would rather see a plan to limit the amount of cars allowed in the valley - I believe that would benefit the ecology of the park more than the removal of existing facilities.*
>
> (Individual; Correspondence #361)
>
> *I did not see one proposal that asks for a reduction in human traffic entry into the park. REDUCE the numbers of people entering the park everyday and you will help to restore the environment. REDUCE the numbers of people entering the park and you will preserve the watershed. REDUCE the access of individual car traffic into the park and you will reduce the amount of carbon monoxide emissions that distrubs the growth of trees and plants and poisons the air we breathe*
>
> (Individual; Correspondence #562)
>
> *I support that which will limit personal motorized travel. I am in favor of limiting the number of people who use the park in the summer months and that number should be less than is now being allowed.*
>
> (Individual; Correspondence #2118)

Response: Please see the response to Concern 331.

Concern 333: The NPS should restrict the use of RVs within the park.

> *May I also suggest a restricted use of Recreational Vehicles as they generally take up too much space, use dirty energy and hold up flow of traffic.*
>
> (Individual; Correspondence #120)

RVs over the size of a standard car, or any vehicle pulling a trailer, should have travel restrictions during peak season. - If RV or Trailer is to be used for in-valley camping then should only be allowed to be driven to campground upon arrival and out of park on last day. At entrance station validate camping reservation on computer and issue 2 hour driving permit to get to campground, along with a 2 hour driving permit for last day of reservation. - If RV or Trailer is just passing through (e.g. Wawona to Tioga), Issue colored driving permit for approximate amount of time needed to traverse intended route - All others must leave RV or Trailer in parking area outside valley.

(Individual; Correspondence #125)

Response: Vehicle size restrictions are based on safety and road characteristics. These restrictions are consistent for all vehicles, and do not single-out any one type of vehicle. Restricting the access of a specific user group would not be consistent with the mission of the National Park Service.

Concern 334: The NPS should encourage people who have overnight lodging reservations and private vehicles to remain parked for the duration of the visitor's stay.

Not much to add to the day use proposal, except to clarify that personal vehicles would be permitted in the park for camping and lodging access, but would be expected to remain parked in the designated areas for the duration of the stay. Also provisions for local day use for shopping etc. might be considered.

(Individual; Correspondence #483)

Response: Alternative 5 (Preferred) has increased shuttle runs and increased shuttle frequency to encourage visitors to use the shuttle system to move from site to site rather than using personal vehicles. The Park website also encourages use of the shuttle for in-Valley transportation. Additional educational measures are taken at hotels and campgrounds to encourage the use of valley shuttles.

Concern 335: The NPS should provide additional explanation about the current plan and its relationship to the General Management Plan goal to reduce or eliminate private vehicles.

GMP Amendment: "no ultimate exclusion of private vehicles." Appendix A, Yosemite Valley Transportation, page A-13, states there will be "no ultimate exclusion of private vehicles." The original GMP goal identified day visitors as the first priority, followed by overnight visitors, to be targeted to "enjoy the Valley without their cars." So what "private vehicles" does the amendment refer to for "no ultimate exclusion"?? Employees' private vehicles?? Overnight visitors' private vehicles?? A vendor's private vehicle?? The Amendment needs to be clarified as to what the term "private vehicles" really represents... that there appears to be no discussion in the voluminous text of the DEIS with respect to the proposal to eliminate/amend the GMP goal of ultimate exclusion of private vehicles in Yosemite Valley. Instead there appears to be a lot of double talk claiming "the infrastructure to support a system to transport all visitors into Yosemite Valley is not in place, and the funding required to develop a large internal system is not available"; the large amount of buildable land required for satellite lots in El Portal, Crane Flat, and Wawona (as proposed in the GMP) is not available?"; and the complex planning process required to develop an external regional transportation system is not possible to complete within the court-mandated timeframe to complete this plan." Such language is along the same lines as statements made in past plans: "economically infeasible and impractical at this time"; a "phased, collaborative approach would be required to achieve this goal"; "collaboration is ongoing to develop a regional transportation system"; "it is not possible at this time to project when it would be feasible to remove all private vehicles from Yosemite Valley."

(Individual; Correspondence #1617)

- The current DEIS for the Merced River Plan fails to appropriately discuss past promises and written statement made by previous Park Superintendents who pledged to remove or substantially reduce private vehicle use in Yosemite Valley and to move development to the periphery of the Park. The FEIS should provide this discussion. ... CSERC asserts that the DEIS fails to adequately acknowledge that past

promises made to the public by Yosemite Park superintendents are being broken and that trust is being abused by the current proposed management direction that deviates so markedly from the General Management Plan and past promises.

(Individual; Correspondence #2210)

Response: The General Management Plan has been amended to reflect actions in the MRP. The relationship between the General Management Plan and the Merced River Plan in regards to facilities is described in "Development of Lands and Facilities" (Chapter 7). Specific amendments to the General Management Plan are described in Appendix A.

Concern 336: The NPS should restrict the use of private vehicles in East Yosemite Valley, rather than investing in parking and infrastructure changes to accommodate high levels of traffic.

The Preferred Alternative will, if selected, entrench the use of the private vehicle in the east end of Yosemite Valley through the creation of major new parking lots, an increased user capacity level, and a huge investment in private vehicle traffic management and infrastructure changes that are only needed if high levels of traffic are continued to be allowed in the eastern half of Yosemite Valley.

(Individual; Correspondence #2207)

No restrictions of any sort on private vehicle use would be enforced until the point that the Park determines that even with new parking spaces provided, traffic reaches a point that no spaces remain. Only then would private vehicle traffic be diverted elsewhere

(Individual; Correspondence #2207)

Response: The NPS is investing in targeted changes to the transportation system in order to accommodate visitation similar to existing levels while protecting river values and improving the visitor experience. In many cases, the parking development in East Yosemite Valley is not to increase the number of parking spaces, but rather to relocate parking so the overall transportation system is more efficient and easier for visitors to navigate. As a part of the User Capacity Management Program, the NPS will be managing visitor use so user capacities are not exceeded. One user capacity management tool that will be used to ensure capacity is not exceeded in the traffic diversion at El Capitan Crossover. When a specific number of vehicles have accumulated in East Yosemite Valley, the NPS will implement this temporary access restriction to prevent traffic congestion from reaching unacceptable conditions. For additional information about the transportation system performance and how it relates to the User Capacity Management Program, please see Chapter 6 and Appendix S.

Transportation—Traffic Congestion

Concern 337: The NPS should address traffic congestion by making parking more difficult and public transportation more convenient.

Clearly people are likely to initially access the park and the river corridor by private car - but once in the Park and the Valley, using the car for sightseeing and internal transportation makes much less sense and creates a lot of the congestion, air pollution, road rage, and parking problems that diminish the visitor experience and degrade the environment. Once in the Park, those other options - walking, biking and taking transit - should be made so attractive and easy that more people can realistically choose them. ... If you are serious about wanting people to drive less while in the Park, you will make parking more difficult and expensive and you will make driving (especially short trips)less convenient than the alternatives.

(Individual; Correspondence #1838)

... the number of private automobiles and sheer volume of visitor numbers during the peak season threatens the very values that make Yosemite so special. To limit and if possible to reduce this burden,

we support increased availability of public transit, both as a means of accessing the Park from outside, and of moving visitors around within the Park.

(Individual; Correspondence #1890)

Response: Please see response to Concern 331.

Concern 338: The NPS should consider opening Southside Drive between Wawona Road and Pohono Bridge to two-way traffic to reduce the valley congestion.

On these trips we are just passing through the park and having to make nearly the whole circuit just to go to Tioga Pass [from Oakhurst]. It is just a waste of time for us to do this as well adding extra conjestion within the valley. A few years ago while road work was being done in the valley, north and south bound traffic could bypass by turning north near Bridelveil Falls. A permanent bypass would seem to a be a good way to reduce the valley congestion.

(Individual; Correspondence #3175)

Response: The NPS has evaluated this suggestion, and dismissed it from further analysis because the gain in convenience for pass through users would not outweigh the benefits of two lanes for incoming visitors. Visitors interested in avoiding congestion in Yosemite Valley while traveling between Wawona and Tioga Pass can utilize El Capitan Crossover. While this does not bypass potential congestion at Bridalveil Falls, it avoids the more extensive congestion in East Valley.

Visitor Use—Bicycling

Concern 339: The NPS should improve bicycle infrastructure to reduce traffic congestion in a cost-efficient manner.

... we [the League of American Bicyclists] recommend significantly upgrading the quality of the bikeway network in the Park and in the river corridor. Improved facilities, better signage, surface improvements, better bike parking, and promotion of biking as an option are all easy to do and are significantly less costly than providing more parking or adding traffic controls and more lanes for cars to fill.

(Individual; Correspondence #1838)

Response: The NPS considered the role of the bicycle in developing project alternatives for the MRP, in transportation and recreation. In peak season, 7,000 to 10,000 vehicles circulate around the Yosemite Valley loop road each day. Nearly 100% of visitors enter or exit the park in an automobile, bus or recreational vehicle. While bicycles do help reduce the volume of motor vehicles circulating on park roads, most bicycle trips occur on the bike path in eastern Yosemite Valley, where bike path connections exist between the village, campgrounds, lodges and primary attraction sites. A very small number of visitors actually venture into the west valley on a bicycle, but may do so on the existing roadways.

All of the park's bike paths were constructed in the last 30 years. Park managers will continue to integrate bicycle use in transportation planning. But traffic congestion is influenced more directly by day use visitation plus inbound and outbound overnight visitor movement. In a park with managed access, these daily traffic volumes can be controlled by other means and will not be substantially affected by bicycle use.

Concern 340: The NPS should encourage visitors to enter Yosemite National Park or the Merced River corridor by bicycle.

While we [League of American Bicyclists] acknowledge that relatively few people will enter and exit the Park and the River Corridor by bike, the activity and choice that people make to do so is one you should

> *actively encourage and embrace. Right now, especially if traveling in a group of any size, bicyclists rarely feel welcomed by the Park Service and any discretion given to Parks to manage bicyclists is usually exercised against the safety, comfort and convenience of the cyclist.*
>
> (Individual; Correspondence #1838)

Response: Park managers can only accommodate bike use within park boundaries. Cyclists are legally entitled to use park roads and have the same rights and responsibilities as motorists. A trip to Yosemite involves travel over state highways, which are constructed and maintained by Caltrans, and through cities or towns that are managed by local government agencies. A very low number of visitors actually arrive to the park on a bicycle, as only the hardiest of cyclists will travel 43 miles from the nearest gateway community to Yosemite Valley. If there is an issue or concern with the attitude of park staff toward cyclists, the commenter is encouraged to contact the superintendent with more information.

Visitor Facilities

Concern 341: The NPS should improve existing facilities, including campgrounds, bathrooms, and parking lots, and ensure that maintenance of new facilities is adequately funded.

> *Improve the already built camps/public bathrooms, every time there is a new project there doesn't seem to be funding to keep things in good operating order, no funding to really keep things or upkeep, get it together and have in the budget the funding in order to hire employees to do the job thoroughly all the time!*
>
> (Individual; Correspondence #70)
>
> *Destroying current infrastructure should not be considered...Improvements to existing structures could be an alternative.*
>
> (Individual; Correspondence #99)

Response: The recommendation to improve existing facilities and ensure that new facility maintenance is adequately funded was considered in the planning process. The NPS has a comprehensive asset management plan that prioritizes the repair and cyclic maintenance of all facilities within the park. The operation and maintenance cost associated with new development is a consideration when determining the consequence of proposing new assets. In most cases, the proposed new development is replacing existing development that is costly to maintain and operate due to its age; therefore, the maintenance of these assets would be adequately prioritized and funded in accordance with the park's asset management plan.

Concern 342: The NPS should retain the Concessioner Garage to allow Yosemite Valley visitors with car problems access to auto repair.

> *We unfortunately found [the valley garage] an absolute necessity when a squirrel decided to breakfast on some crucial wires in our car. Without a village garage what would we have done? A tow to Oakhurst?*
>
> (Individual; Correspondence #1621)
>
> *Finally, our Board has concerns with relocation of the garage facility to supply more parking and better flow of traffic. Although more parking and improved traffic flow is important, a good visitor experience is equally important. Requiring visitors to have vehicles towed outside the Park for repairs is very expensive, unfair and will disrupt vacations. Furthermore, towing cars out of the Park will only slow traffic and impede traffic flow.*
>
> (Individual; Correspondence #1984)

I believe that there will be a long-term need for facilities to provide unanticipated repairs to automobiles (including recreational vehicles and buses) owned and operated by the general public. The DEIS does not sufficiently describe how those services will be provided in El Portal or Crane Flat. These services can be reasonably anticipated, and the failure to plan for them in a well-thought-out way will result in impacts to public safety and traffic circulation for many visitors, and considerable inconvenience and expense to those who require service. Keep in mind that NPS personnel, including rangers and road crew, will find themselves tied-up for extended periods of time assisting motorists with disabled vehicles because to do otherwise would leave people in distress and traffic circulation (including emergency vehicles) compromised. I do not believe that it is wise for the park to expect out-of-park repair and tow services to be able to fill the service gap if the services currently provided by the park concessioner are discontinued or removed to the more remote locations in El Portal and Crane Flat. Ask planners to consider how the tow and repair operation would actually function in such a scenario. The existing concessioner garage in Yosemite Valley is sited in a central location where visitors waiting for repairs have access to other services, including lodging and food outlets, public transportation within and out of the park. Do we expect the El Portal Market or Crane Flat Store to become waiting areas for visitors pending the repair of their vehicles? If so, they should be planned with that in mind.

(Individual; Correspondence #2133)

Response: The historic Valley Garage, once known as the Curry Garage, was slated for removal in the 1980 GMP. The MRP is carrying the concept forward at this time because WSRA requires park management to determine which facilities are absolutely necessary for public use and enjoyment of the river corridor, and visitor parking is now proposed in that location.

The garage served critical needs in a prior era when Yosemite Village was an isolated place, and broader support services were justified. Since 1920, when the Valley Garage was initially constructed, the kinds and amounts of commercial services has grown in gateway communities. Disabled vehicles can be served through increased use of flatbed tow trucks that can transport vehicles over greater distances, roadside service for light repairs, and a possibility of auto service concessioner contracts in gateway communities.

Concern 343: The NPS should better maintain existing bathrooms and construct additional bathrooms in Yosemite Valley.

Bathrooms in Yosemite are atrocious, dirty and many toilets dysfunctional. It is an embarrassment to us who live and take visitors there. Many of them need to be re-done. Why is the portable at Bridalvale falls so filthy, it's the first attraction many see. All restrooms should have soap/hand sanitizer and towels or dryers AT ALL TIMES and cleaned FREQUENTLY. This by the way is NOT being done.

(Individual; Correspondence #209)

In the valley and the trails above the valley, it would be nice if there were a few more places to relieve human waste from bodies. Do not know about plumbing or technical problems the addition of toilets would cause.

(Individual; Correspondence #1038)

Some other ideas worth considering, in terms of managing impacts:

- Increasing the number of toilets, e.g. at the more heavily trafficked areas... some locations the numbers may warrant temporary or permanent structures.

(Individual; Correspondence #2068)

Response: The quality of restrooms and the maintenance regime are operational issues that need not be addressed by a Wild and Scenic River plan. Restrooms are equipped and cleaned as staffing priorities and financial resources allow. Existing restrooms are currently upgraded as funding allows. NPS recently allocated funds to improve access to many existing restrooms; this work will commence in 2013.

Conceptual site drawings presented in "Alternatives" (Chapter 8) demonstrate that comfort stations will be constructed in parking areas, at transit stops and in campgrounds where improvements are proposed in Yosemite Valley, Wawona and El Portal. Functions and methods of construction of restrooms are limited by their locations, and whether water or sewer system connections are feasible. The NPS has spent millions of dollars improving water treatment facilities in the past 30 years, but sanitary sewers cannot be extended to all restrooms. Not every restroom can have flush toilets. Park management must rely on vault toilets in locations where water and sewer lines do not exist.

Concern 344: The NPS should improve and maintain the Cathedral Beach parking area to allow for year-round access to the Cathedral Beach area.

> *In the plans there appears to be provisions to enhance the experience of those using the Cathedral Beach area but I could not find any mention of improvements to the parking in this area. It would be fantastic if this area could be revisited in more depth so that it was possible to use the Cathedral Beach parking all year round. The views along the Merced River, overlooking El Capitan, are quite spectacular in the winter but access is not easy as the car park is closed. Providing an area here that was cleared of snow for cars to park in could possible contribute to easing the situation referred to above. It would also save people a long walk in during the winter over unknown ground that are looking to visit the banks of the Merced during winter.*
>
> (Individual; Correspondence #44)

Response: In the NPS final Alternative 5 (Preferred), the Cathedral Beach Picnic Area parking will be delineated and improved, and the riparian zone restored. During the winter months, visitor access to this picnic area is allowed, but vehicle access is restricted as the NPS cannot plow non-paved roads. This is an operational detail not addressed in the river plan.

Concern 345: The NPS should not construct any new permanent structures within the Merced River corridor in Yosemite Valley.

> *.... the DEIS did not rigorously explore the feasibility of NOT constructing the 56 new permanent structures now proposed for construction by Alternative 5 (Preferred Alternative). This is even more of a legal conflict instead of compliance with the WSRA. ... The total of new structures allowed for construction in Alternative 5 equals 56 new permanent structures that would be ADDED to existing permanent facilities in the Wild and Scenic River corridor. Yet the Wild and Scenic Rivers Act Secretarial Guidelines only allows major facilities that "are necessary for public use and/or to protect the river resource, and location outside of the river area is infeasible." None of the 56 structures meets the test. First, 32 structures are strictly intended to be for visitor lodging (to profit the concessioner) -- replacing tent cabins that are truly not necessary to be located either within the Park or within the river corridor in Yosemite Valley. Any neutral evaluation of those 32 structures will find that it is feasible for lodging to be constructed outside of Yosemite Park to accommodate visitors who want to visit the Park. - The FEIS should show that it is highly feasible for those 98 units of visitor lodging to be relocated outside of the Park instead of constructing permanent new structures in the river corridor. It may not be desirable to the concessioner or to the Park management who prefers to provide for high levels of visitor lodging, but it is feasible.*
>
> (Individual; Correspondence #2210)
>
> *By the Mission 66 era, the Park decided: "...the limited area of the Valley, in relation to the physical facilities essential to operate the park and to serve the tremendous number of park visitors attracted to it, is the heart of the problem. We can no longer continue to build, construct, and develop operating facilities on the Valley floor without seriously impairing and ultimately destroying those qualities and values which the National Park Service was created to preserve and protect for future generations" (5-15). Yet in Alternative 5, that Preferred Alternative would do the exact opposite of what the Park determined to be appropriate – halting construction and development of facilities on the Valley floor. The Preferred Alternative is thus in conflict with Park planning objectives.*
>
> (Individual; Correspondence #2211)

Suggest that if you insist on proposing additional campsites, lodging units, and parking spaces, that you justify these additions in terms of how they will benefit river ORVS and resources. The truth is-they won't.... In its present form, the draft Merced River plan will not provide that protection.

(Individual; Correspondence #2273)

Response: The NPS carefully evaluated each facility currently within or proposed for the river corridor in accordance with applicable requirements, including the criteria contained in the Secretarial Guidelines for implementing WSRA. The Secretarial Guidelines provide that major public use facilities will, where feasible, be located outside the river corridor. If a facility is necessary to provide for public use or resource protection and it is infeasible to locate the facility outside the corridor, the Secretarial Guidelines allow the facility to be located in the corridor if it does not adversely affect ORVs. Other factors that informed decisions about the retention, relocation, removal, and construction of facilities are discussed in "Development of Lands and Facilities" (Chapter 7).

In addition, as explained in the introduction to "Alternatives" (Chapter 8), the NPS considered whether particular facilities were necessary to achieve the visitor experience and land use planning goals of each alternative. The range of facilities in Alternatives 2 through 6 differs depending on the visitor experience and resource protection goals of each alternative.

The NPS determined that the facilities proposed for construction in Alternative 5 (Preferred) were necessary for public use and/or resource protection, that they would not adversely affect ORVs, and that it was not feasible to locate these new facilities outside the river corridor. The NPS followed the same process for Alternatives 2, 3, 4 and 6 but reached different conclusions based on the goals of each alternative. For example, in the case of Alternative 2, which focuses on a self-reliant visitor experience and maximum resource restoration within the 100 year floodplain, the NPS determined that it was feasible to remove many more facilities from the river corridor than proposed in Alternative 5 (Preferred).

Concern 346: The NPS should retain or relocate the Art Activity Center, rather than remove it.

Closing the Art activity center. This facility provides education and artistic expression experiences for all visitors. Having a way for visitors to translate what they have seen into an expression of how they envision what they have seen is an important addition to experiencing the park.

(Individual; Correspondence #605)

I am saddened to see the Art Activity Center go; on one of your graphs you showed that artistic pursuits (painting, drawing, photography) make up an enourmous amount of visitor activity. I believe that the Art Centre was a great place to facilitate this, and am hoping it is just relocated rather than gotten rid of.

(Individual; Correspondence #2035)

** Art Activity Center. I support the relocation of this service as long as its new location is convenient for visitors. Experiencing Yosemite through art is an activity that should be strongly encouraged.*

(Individual; Correspondence #2607)

Response: Each public use facility within the river corridor (including the Art Activity Center) was evaluated to determine whether it was: (1) feasible to relocate outside the river corridor, (2) if not feasible to relocate, necessary for public use or resource protection, and (3) if not feasible to relocate and necessary for public use or resource protection, whether the facility could be maintained without adverse effects on river values. In the specific case of the Art Activity Center, this evaluation showed that there are adequate facilities outside the river corridor that could absorb these functions, and the facility is not necessary for

public use or resource protection. Because of this, the building will be removed to allow for the redesign and partial restoration of the Yosemite Village Day-use Parking Area.

Concern 347: The NPS should examine the feasibility of moving major facilities outside the Merced River corridor.

> *In addition to allowing the retention of so many unnecessary facilities within Yosemite Valley, the DEIS did not examine in detail the feasibility of removing major facilities elsewhere in the river corridor. These comments from our Center will go into detail concerning the WSRA conflicts caused by proposed retention of the Wawona Golf Course and associated commercial enterprises as well as other facilities in the corridor that are in conflict with the WSRA.*
>
> (Individual; Correspondence #2210)

Response: The process that NPS used to evaluate the necessity of existing facilities and their effects on Outstandingly Remarkable Values is described in the response to Concern ID 308.

Removal of the golf course and associated facilities was proposed in Alternatives 2 and 3 and was analyzed in the environmental consequences section of "Affected Environment and Environmental Consequences" (Chapter 9). Alternative 5 (Preferred) proposes to retain the Wawona Golf Course and a number of other commercial facilities. The NPS does not believe that the facilities proposed for retention in Alternative 5 (Preferred) conflict with the mandates of the Wild and Scenic Rivers Act.

Concern 348: The NPS should install restroom facilities at the Wawona Swinging Bridge and Flatrock swimming areas to protect water quality on the South Fork Merced River.

> *To protect the water quality of the S. Fork of Merced, please add portable toilets at the Swinging Bridge and Flat Rock areas.*
>
> (Individual; Correspondence #2886)
>
> *I would appreciate portable restroom facilities being provded for users of the Wawona Swinging Bridge swimming area and Flatrock swimming area by Vagrims in Wawona.*
>
> (Individual; Correspondence #2936)

Response: A comfort station will be provided with parking area improvements at the Swinging Bridge day-use site in Wawona. These improvements, though called for in the plan, will require additional NEPA compliance. The park may also consider a second comfort station with a small day-use parking area at the Flatrock site, pending further study of land ownership and removal of the existing residential structure.

Concern 349: The NPS should remove or relocate the wood lots and burn pile facilities in the river corridor to improve air quality and visitor experience.

> *Facilities, of such, not mentioned in the MRP are wood lots/burn piles located in Yosemite Valley, Wawona, and El Portal. These burn piles are not necessary in these locations to manage the Merced River and they degrade visitor experience and the scenic ORV when they are producing (prodigious amounts of) smoke. These functions should be removed or relocated outside the river corridor (and, ideally, outside the national park, an EPA Class I airshed).*
>
> (Individual; Correspondence #3402)

Response: Woody debris accumulates in developed areas from hazard tree mitigation (i.e. removal of trees that could fall on visitors, residents, or employees) and periodic shedding of branching/leaves/needles. This woody debris is removed from developed areas to reduce fire danger and is taken to wood yards, where some of the wood is removed for use as firewood, and the remainder is burned. Burning of debris piles occurs when smoke dispersal conditions are good, generally in winter, which protects air quality and the

visitor experience. It is infeasible to remove these facilities because they require a large area and alternative locations would also fall within the river corridor. However, the facilities are necessary for resource protection (for the reasons stated above) and have no adverse effects on river values.

Concern 350: The NPS should not consider Residence 1 a major public use facility nor remove it from the river corridor.

> *... we cannot reconcile the Major Public Use Facility analysis for Residence 1 with the fact that it has been unused since 1997. There is no cogent argument to be made that an empty historic building is analogous to developed campgrounds, major visitor centers and administrative headquarters. MRP at 7-1. Since it is clear that Residence 1 is not a Major Public Use Facility, there is no sufficient rationale supporting its move out of the river corridor.*
>
> (Civic Group; Correspondence #8329)

Response: The 2008 decision issued by the U.S. Court of Appeals for the Ninth Circuit concluded that NPS could not presume that facilities that existed in the river corridor before the river's 1987 designation as wild and scenic were protective of river values. The 1982 Secretarial Guidelines outline two categories of facilities in the river corridor: major public-use facilities and basic facilities. Basic facilities—such as picnic areas, public restrooms, roadside pull-outs, shuttle bus stops, and campground kiosks—may be located in river areas because they help to absorb the impacts from use and protect the river. Therefore, all other types of facilities were evaluated in "Development of Lands and Facilities" (Chapter 7), including Residence 1. Major public-use facilities may be retained in the river corridor if they cannot be feasibly relocated, are necessary for public use or protection of the river resource, and will not adversely impact river values. See response to Concern 66 for further discussion of Residence 1.

Visitor Facilities—Wayfinding/Orientation

Concern 351: The NPS should improve signage in the river corridor to educate visitors and protect resources.

> *Shared use paths should have their own navigational signage system, the signs should be distinct from the natural surface trails and pedestrian only ways.*
>
> (Individual; Correspondence #1674)
>
> *I think with signage warning people not to trample the meadows and restoration of many of the trails, leaving a few a trail going through the meadow would be a good option.*
>
> (Individual; Correspondence #2269)
>
> *I saw far too many people not respecting wildlife and not respecting the park (employees definitely included, just look at the litter around Huff). I believe this could be improved if the natural resources were emphasized more and commercialism less. More signage/interpretative displays and perhaps a bigger ranger presence could help people understand how lucky we are to have Yosemite and the Merced River.*
>
> (Individual; Correspondence #2400)
>
> *I would also like to see more trail signs, which will likely eliminate the "people created" pathways.*
>
> (Individual; Correspondence #2582)
>
> *For example, although the surveys show that people enjoying the river do not believe that the river corridor is over-crowded, it also shows that most people are interested in protecting the environment but simply fail to recognize damage to river banks and riparian areas. Is it clear that increased public*

education couldn't reduce the impact to these sensitive areas while still allowing more people to enjoy the river experience in traditional ways?

(Individual; Correspondence #3413)

One thing I would like more of: maybe label some of the trees around the visitors' center & some signage about the natural values & ecology. As I am a visitor to this continent I am totally unfamiliar with the trees & birds. The information on natural history & ecology is sparse compared to the level of information about heritage & history, the emphasis seems to be on recreation & heritage. I didn't hear or see the word "biodiversity" anywhere.

(Individual; Correspondence #29340)

Response: Signage in the river corridor and parkwide is being addressed at a programmatic level through the recently established Superintendent's Sign Committee. The role of the Committee is to establish and implement standards for the planning, design, fabrication, installation, inventory and maintenance of all outdoor signs for Yosemite. One of the goals of the sign committee is to improve and consolidate signage for better wayfinding and to prevent trampling of resources. Installation of new wayfinding, interpretive and regulatory signage will be vetted through the Committee and be consistent with the *2011 Design Guidelines for Yosemite National Park* and the *2012 Long Range Interpretive Plan*.

Visitor Facilities—Entrance Stations

Concern 352: The NPS should consider improvements to the Arch Rock Entrance Station to minimize traffic delays.

I was surprised to see that no change is recommended to the Arch Rock Entrance Station. On even moderately busy days the line at the entrance station can back up and cause 20 plus minute delays. On hot days a good portion of the wait is in direct sun. This is not a good introduction for visitors to Yosemite. I would like to see a thorough analysis (perhaps in a new study) to evaluate if relocation of the entrance station is feasible. Possible locations could be El Portal (at the park border) or at the Cascades.

(Individual; Correspondence #2240)

Whether the daily visitation limit is 19,900 or 21,800, traffic management has to be addressed. I think that most problems occur at the Arch Rock entrance. There needs to be improvements in the way vehicles pass through that entrance so that waits do not last up to 60 minutes.

(Individual; Correspondence #2514)

A second concern is that we do not see any plans for the expansion and improvement of the gate facilities on Hwy 140. Other gates have received or have planned improvements to expedite access to the park. The Hwy 140 gate is a busy, all-weather gate and should receive equivalent attention.

Improving this gate would contribute to enhancing the quality of visit for those who choose to drive to the park. Additionally, if it is the wish of the park to see greater ridership on alternative transportation, making it possible for the transit buses to move through the gates in the most expeditious way possible would increase the attractiveness of the transit alternative.

(Business; Correspondence #2949)

Response: The NPS is aware that Arch Rock Entrance station can have significant traffic queues on busy summer season days, and intends to redesign this entrance station. The document has been updated to clarify this direction (See the Alternative 5 [Preferred] description in “Alternatives” [Chapter 8] under Segment 3). This action will require additional design work and NEPA compliance following the *Final Merced River Plan/EIS*.

Concern 353: The NPS should consider improvements at entrance gates to prevent excessively long wait times and expedite entry to the park.

Provide a pass-through lane at the entry gates for pass holders, employees, etc.

(Individual; Correspondence #2015)

Using both sides of the kiosk during peak hours, accomplished by halting out-going traffic for reasonable periods of time, would be helpful and not too disruptive. Also, any way that buses take care of their entrance issues before they reached Arch Rock would be extremely helpful. A Yosemite Visitor Center in Mariposa would be a great tool to help expedite their entrance.

(Individual; Correspondence #2514)

Use your time and thinking to figure out a more efficient entry system into the park to avoid LONG lines at the gate. Perhaps charge every car $10 (or whatever) that is deposited in a money machine like the car wash uses and then the arm swings up to allow entry.

(Individual; Correspondence #2905)

Response: The NPS is aware that Arch Rock Entrance station can have significant traffic queues on busy summer season days, and intends to redesign this entrance station. The document has been updated to clarify this direction (See the Alternative 5 [Preferred] description in "Alternatives" [Chapter 8] under Segment 3). This action will require additional design work and NEPA compliance following the *Final Merced River Plan/EIS*. Other entrance stations to the Park are outside of the Merced River Corridor and thus changes to them are out of scope of this plan.

Visitor Facilities—Campgrounds

Concern 354: The NPS should reduce generator use in the campgrounds.

Bring more eletrcity to the campgrounds to reduce generator use.

(Individual; Correspondence #43)

Generator use in the totally out of hand with generators running at all hours. There is little on no enforcement of the posted rules. We have seen this problem grow by leaps and bounds over the past few years. An expansion of campgrounds will only add to the problem if it is not considered in the new plans. The solution lies in having campers sign an understanding of all the campground rules just as they sign the Bear Statement. In talking with campground hosts and Ranger personnel we are told that campers must do their own policing. This is really not acceptable. Also why can't there be only one campground open to generator use during the Spring and Summer camping seasons? If not then someone representing the Park needs to enforce the rules and the word will spread.

(Individual; Correspondence #2199)

Response: The NPS is proposing a dedicated RV loop with 36 sites and hook-ups as an expansion of Upper Pines Campground (see "Alternatives" [Chapter 8]). Electrical service might ultimately be extended to other campgrounds, but those proposals would be evaluated conjunction with further environmental compliance procedures. NPS management of generator use in existing campgrounds is an operational issue that can be addressed outside of the *Final Merced River Plan/EIS*.

Concern 355: The NPS should rebuild all campgrounds to pre-flood conditions.

Rebuild Lower and Upper River Campgrounds with longer and wider campsites

(Individual; Correspondence #43)

Under the Preferred Alternative 5 in the MRP, the Park Service attempts to add more campgrounds in Yosemite Valley. Although our Board appreciates this effort, we strongly encourage the Park Service to make available at least the number of sites that existed prior to the flood of 1997. We believe that this can be done without encroaching on the river's edge. ... According to NPS statistics, the were approximately 500,000 fewer overnight stays in Yosemite in 2011 than in 1996 when the park previously recorded 4 million annual visitors. This is due to the many lodging/camping units not restored after the 1997 flood and correlates to a large increase in day-use traffic coming from the gateway areas, thus increasing the probability of congestion.

(Individual; Correspondence #1984)

Restore some campsites at Lower River, Upper River and Lower Pines manage their use doing parts of the year when weather is a factor. Creating campsites farther down the valley is not a solution. Please let middle class Americans enjoy the park too.

(Individual; Correspondence #2301)

If you just went back to increasing the number of overall units in the Valley, particularly back to the level prior to the Flood of '97, you would actually decrease the amount of daily traffic coming in and out of the Valley.

(Individual; Correspondence #2463)

Response: Rebuilding the number of campsites to pre-flood levels is a suggestion that is inconsistent with the 1980 General Management Plan. Prior to the 1997 flood, there were 800 campsites in eastern Yosemite Valley (all "Pine" and "River" campgrounds). The GMP limited the number of east valley camp sites to 684. The Merced River Plan adds 210 sites in east valley campgrounds, increasing the Yosemite Valley supply from 462 currently to 636.

Upper and Lower River Campgrounds included 225 sites before the flood. Based on the extent of damage caused by the flood, a draft Valley Implementation Plan and an institutional realization that 70 percent of the site lies within the 10-year flood plain, these campgrounds were closed in their entirety and most of the surface development was removed.

In response to public comment, in the FEIS, the NPS revised Alternative 5 (Preferred); low-impact camping is now proposed at the Upper and Lower River campground sites. 30 walk-in sites and 2 group sites are proposed at the Upper River site, and 30 walk-in and 10 auto campsites are proposed at Lower River.

Concern 356: The NPS should limit camping and lodging facilities in order to improve visitor experience.

If anything, limit camping and lodging, don't add more campsites, remove some sites and make a more realistic camping experience, as it is in the valley people are packed in there like sardines at the campgrounds.

(Individual; Correspondence #70)

I can't agree with the projected increase in camping facilities as being compatabile with preserving the natural environs of the Park.Having recently visited Yosemite in the fall of 2012 I was stunned by the number of people there at that time of year. I cannot imagine what summer must be like in the park. If you increase the camping potential it will only lead to further degradation of the park and the experience one hopes to have when visiting.

(Individual; Correspondence #115)

One of the proposed objectives of the plan that I disagree with the Access Fund on is the expansion of camping areas in the Valley. The Valley already contains multiple campgrounds which house extreme numbers of people each summer and fall. The expansion of campgrounds would not aid climbers, or anyone for that matter, in finding a more unique experience. Campground expansion will only lead to

further over crowding. I understand that camping in the Valley is extremely hard to come by. This is one of the side effects of trying to spend time in one of the most beautiful places in the world.

(Individual; Correspondence #1971)

Response: The NPS received a wide range of comments regarding an appropriate level of camping and lodging in the park. The MRP limits the number of campsites and lodging units according to the numbers and locations presented in "Alternatives" (Chapter 8). These capacities were developed with the consideration of visitor experience and restoration objectives for each alternative, as well as the 1980 GMP. Concern 358 includes more details about the planning process regarding camping.

Concern 357: The NPS should expand camping and lodging facilities in Wawona in resource-appropriate locations away from the river in order to meet camping needs within the park.

While campsite removal in Wawona is good to protect the river, could the campground be expanded away from the river, or additional sites set in the maintenance area that horse campgrounds have been proposed in? This would help alleviate some of the issues with too few campsites in the park in general and Wawona in particular.

(Individual; Correspondence #95)

I suggest expanding the camping and lodging facilities in the Wawona area and running shuttles to the Valley floor, while limiting personal cars driving down for day use.

(Individual; Correspondence #2635)

Response: Because of the mountainous setting and steep slopes, the amount of level land or developable building sites is essentially limited to what has been developed previously in Wawona, as in other areas of the park. Sites that might appear to be available have been identified as having high cultural resources or scenic value, or are located in the 150-foot riparian buffer that runs along both sides of the river.

Concern 358: The NPS should not increase campgrounds in order to protect existing resources and limit visitor impacts.

Unfortunately increasing the number of camping spots along the river will only increase the foot traffic and accelerate degradation of the river banks.

(Individual; Correspondence #877)

I feel that the increase in camp sites and parking is the opposite of protecting the natural beauty of Yosemite Valley.

(Individual; Correspondence #1321)

I don't think we need any more campsites in Yosemite valley. I avoid the valley in the summer due to the congestion and smoke from campfires and feel if more campsites are needed they should be placed outside the valley.

(Individual; Correspondence #1819)

I strongly oppose proposed new camping areas in all presently undeveloped locations: next to Upper Pines Campground (36 new RV sites, 49 new walk-in sites, 2 new group sites), east of Camp 4 (35 new walk-in sites), west of backpacker's Campground (16 new sites), in former Upper River Campgrounds (30 new walk in and 2 new group sites), and at a completely new site called Eagle Creek east of El Capitan picnic area (40 new auto sites and 2 group sites). It is very important to note that all of the proposed new campsites are in presently undeveloped areas. Some of these areas have suffered from past impacts, but the NPS should not be increasing the development footprint in the Valley at all.

(Individual; Correspondence #2273)

Alternative 5 proposes changes that are incongruous and in conflict. significantly increasing campsite inventory (+37%) and day-use parking spaces (+11%) in Yosemite Valley has a direct and negative impact on the environment. Increased camping and parking means more people on the river, more traffic, and more air pollution from cars and campfires.

(Individual; Correspondence #2637)

Response: The 1980 GMP (page 43) established a cap of 684 drive-in campsites in Yosemite Valley. Only 406 drive-in sites exist today, with 60 walk-in sites. The combination of drive-in and walk-in campsites now proposed in the MRP amounts to 640 sites. In Wawona, the number of sites would decrease from 99 to 86, a loss of 13. Proposed site locations were selected because they are located in places where camping can occur without adverse impacts to river values. Additional site design will ensure that river values remain protected. All existing campsites within 100 feet of the river will be removed. All new campground construction will occur outside of the 150-foot riparian buffer.

Concern 359: The NPS should consider separating campgrounds for groups and RVs away from car and tent camping because of the noise and light pollution they create.

Do not add hookups in campgrounds. Provide separate campgrounds or sections for RV's over a certain size.

(Individual; Correspondence #125)

The preferred alternative includes additional camping opportunities - both for campers and for RVers - separately, I like that. In fact I'd really prefer more separate camping for car campers with tents versus those with Rv's - the noise and light pollution have forced us to go to camp 4 when we'd prefer to car camp.

(Individual; Correspondence #335)

The proposal to increase campsites and closure of some camp grounds is excellent, but I would like serious study to the impact of RVs during the summer months in the valley - the pollution, congestion, and lack of harmony with the natural environment. It would be a far better alternative to remove most, if not all, RV and only allow tent camping with perhaps accommodations for handicapped visitors. Retaining curry village, housekeeping, Awanee lodge, and other hotels in current configuration will allow those who are unable/unwilling to camp to enjoy Yosemite.

(Individual; Correspondence #444)

Increasing camp sites is a great idea, and I would strongly support not allowing RV's in all campgrounds. The noise and disruption of RV's coming and going all night is a huge disruption to camping and my last experience camping was to me, the last I'd ever consider.

(Individual; Correspondence #725)

I recommend that group campsites not be included within the boundaries of non-group campgrounds to minimize user conflicts and improve the experience of all campers.

(Individual; Correspondence #2133)

Response: The 1980 GMP supports the concept of separating tent camping from vehicle camping. These suggestions can be implemented in existing campgrounds with or without a river plan. These comments will be taken into consideration as to how existing campgrounds are now managed.

In order to make more efficient use of park utilities and the transportation system, the MRP proposes an RV camp site loop at Upper Pines Campground and integrated group camp sites at the Upper River site and in the walk-in addition to Upper Pines Campground.

Concern 360: The NPS should not rebuild the campgrounds that were destroyed in the 1997 flood.

> *Plan #5 calls for new tent campsites in a flood plain. What were you thinking? Remember the last devastating floods after which tent sites were removed? Whatever happened to lessons learned? Imagine the devastation if sudden floods wash out campers staying in these locations.*
>
> (Individual; Correspondence #993)
>
> *Why are we adding more campsites? The 100 year flood in 1997 destroyed some campsites and there are still too many. If the park service plan to add more campsites then please have them be tents only sites. There are already too many RVs in the valley.*
>
> (Individual; Correspondence #1648)
>
> *I remember when there were campsites along the Merced before one spring flooding... Much money was spent removing cement bumpers, regrading, and removing restroom facilities, etc. We were told that camping would never be allowed to return in this area since there was concern that the Merced could do the same thing sometime in the future. It doesn't make sense to return the camping here. Yosemite has already spent much money to take it away from use, and would spend more money to restore it.*
>
> (Individual; Correspondence #1723)

Response: The 1980 General Management Plan, which remains the guiding document for park management, included a planned reduction of 116 campsites. Before 1980, Yosemite Valley included 872 campsites, of which 756 would be retained with GMP implementation. Actions taken to address flood-damaged campgrounds eliminated 410 camp sites predominantly from Lower Pines, Upper and Lower River Campgrounds. Group campsites were removed from Tenaya Creek and Yellow Pine (once known as Muir Tree). Now only 462 sites remain in Yosemite Valley.

To increase the campsite inventory in Yosemite Valley in a resource-appropriate way, in order to approach the goal of the GMP and respond to public comment, the NPS has proposed new campground development in previously-developed sites Under Alternative 5 (Preferred). The final preferred alternative proposes 80 fewer sites than the GMP, with 636 sites in Yosemite Valley, and with 40 additional RV sites in El Portal. New campgrounds will be developed using low-impact site designs, and the majority of sites proposed are walk-in sites, which require a smaller development footprint than traditional car camping.

Alternative 5 (Preferred), as revised, includes restoration of a riparian buffer extending 150 feet from both edges of the river. Site improvements (parking and restroom facilities, and most of the camp sites) would be excluded from the 10-year flood plain. Restroom facilities would be developed outside the 10-year flood plain as flood-resistant structures. These actions are being proposed to address the demand for camping in Yosemite Valley as an essential recreational activity, and to bring the total number of sites closer to the goal that was established by the GMP, while making further adjustments that protect the riparian buffer from human activity and facilities development.

Concern 361: The NPS should increase or improve the amenities available at existing campgrounds, and ensure funding is available to maintain facilities at new campgrounds.

> *I also hope the restrooms in the campgrounds are refurbished and that there are more shower facilities for the campers.*
>
> (Individual; Correspondence #855)
>
> *Please make sure the funding model to maintain the new campgrounds are in place. We camp all over the state and Yosemite's campgrounds are by far the worst anywhere. I have never camped in any place with such poor facilities as Yosemite. The campgrounds are full because the place is Yosemite. If other campgrounds in the state had that quality and the destination was not as special, the place would be*

empty. The bathroom facilities don't have showers, they are not maintained, the sites are well designed and managed, the roads around the campground, especially Toulumne are terrible.

So now you're planning on adding more campgrounds, which itself is not a bad thing, but you can't take care of what you have.

(Individual; Correspondence #1408)

Further, I recommend that all campgrounds be furnished with sources of potable water for restrooms, drinking and washing of cooking utensils. Doing so, I believe, will better serve visitors and, in the long-run better protect park resources, including the Merced River.

(Individual; Correspondence #2133)

Response: The maintenance, upkeep or quality of the park's campgrounds are operational aspects that can be addressed without a river plan. The NPS will replace restrooms throughout all Yosemite Valley campgrounds over the next five years using funding from the Recreation Fee Program. Replacement buildings will include wash basins for campers' cooking and eating utensils. Campsites in Yosemite Valley are in high demand and are routinely filled to capacity when they open. The NPS conducted a visitor survey of facilities in 2013 and will use the information to address some of the maintenance concerns expressed by representative quotes. These and other concerns will be addressed through programs other than those proposed in the river plan.

Concern 362: The NPS should refine the campground reservation system to ensure the system is equitable and cannot be manipulated.

Manage campsite reservations better. Presently all campsites are reserved in one second after they are opened by people who buy banks of campsites with special computer algorithms and then re-sell these campsites on Craig's List. Change system so that this will no longer happen.

(Individual; Correspondence #1829)

It would be really nice if the campground reservations would return to the mail lottery system. Although the website is faster, there are too many people out there who manipulate the website and shut out those who dutifully wait and attempt to get 1 week once every few years. At least the mail order lottery gave everybody an even chance.

(Individual; Correspondence #2229)

My fondest childhood memories were of our annual family camping trip to Yosemite. Unfortunately, as an adult, I haven't been able to share that same camping joy with my own children because it's impossible to get a camping reservation in Yosemite. ANd a lodging reservation in the valley is just as hard. As an alternative, we have stayed in Fish Camp at the hotel there and camped at Bass Lake and drove into the Valley for daytime activities. So reducing the number of campsites seems absolutely ridiculous and unfair.As a CA taxpayer, it's not right that our family can't even get a reservation there. The focus should be on fixing the reservation system so that Californians who live and pay taxes here can enjoy our parks.

(Individual; Correspondence #2635)

Response: The campsite reservation system is generally outside of the scope of the river plan, but the National Park Service is committed to providing fair and equitable service to all visitors who want to camp. We take this responsibility seriously and encourage comments that can help us improve this service. Yosemite's camping facilities will always be challenging to reserve due to the high demand; however, our new reservation contractor has an improved system that is significantly easier to use with improved call center and web access. NPS advises visitors to continue to check for cancellations that may occur for the dates you would like to visit. The inventory of available campsites is always changing due to cancelled reservations. There is also the option of camping outside of Yosemite Valley, in some of the less crowded areas of the park that are still showing

availability for the early summer months. If in the future you are unable to secure a reservation in Yosemite Valley, please keep checking for cancellations, consider reserving at campgrounds outside Yosemite Valley, and consider the possibility of staying in one of our first-come, first-serve camping options. More information can be found on our website at http://www.nps.gov/yose/planyourvisit/camping.htm.

Additionally, the NPS is working closely with the National Recreation Fee Office in Washington, the reservation system contractor, and the United States Attorney for the Eastern District of California to rectify the situation of re-sale camping reservations on 3rd party sites (like Craigslist).

Concern 363: The NPS should limit campfires to improve visitor experience in the campgrounds.

The elimination of campfires in Housekeeping Camp would be greatly appreciated by more than would be affected.

(Individual; Correspondence #59)

I think that larger shared fire pits would work or bbqs instead of fire pits.

(Individual; Correspondence #517)

Whichever plan is chosen, my suggestion is to limit the amount of allowed campfires in the park.

(Individual; Correspondence #517)

One idea to limit smoke from wood fires would be to build propane fire rings at each site and prohibit wood fires. You could charge a premium to turn on the gas.

(Individual; Correspondence #639)

Does the DEIS consider a management plan to decrease levels of wood smoke air pollution in Yosemite Valley? If not, then why not? ... Existing campgrounds that allow wood fires are extremely unpleasant for many people to stay in, especially those suffering from asthma. Does this not limit camping experiences for a segment of the population that wishes to breathe clean nearly wilderness quality air that one would expect in a national park? ... I suggest the DEIS provide for NO-FIRE smoke free campgrounds or sections. These should be located primarily at the upwind of the nocturnal drainage flow of winds in the valley. A study should analyze the smoke distribution from campgrounds and using that information designate loop portions or campgrounds that are least impacted by smoke to be NO-FIRE, SMOKE FREE campgrounds. The new walkin-campgrounds proposed near Curry Village and near the backpackers might be suitable sites for SMOKE FREE campgrounds.

(Individual; Correspondence #3513)

Response: The recommendation to limit campfires to improve air quality and visitor experience in the campgrounds is a level of detail not addressed in this plan; implementing additional campfire restrictions in Yosemite Valley would be an operational decision. However, there are currently fire restrictions in place and air quality is monitored daily.

Concern 364: The NPS should maintain or increase the number of campsites in Yosemite Valley to provide affordable overnight accommodations for visitors.

I applaud the addition of more campgrounds and wish we were still able to enjoy that memorable part of our lives. Now more families will be able to have affordable vacations as we did.

(Individual; Correspondence #1079)

I would also not want to see a reduction in available spaces for visitors, as many of the lower cost spaces have already been eliminated in the last 20 years or so, making it more and more difficult for the average person to visit Yosemite.

(Individual; Correspondence #1083)

The campgrounds at upper and lower river were removed, half the sites at lower pines were also removed... Net effect gone are the working class families that could only afford a campsite if they were lucky to get one, gone also are any real presence of minorities in the park. If you walk around the park today the overwhelming presence is white upper-class people.

(Individual; Correspondence #2301)

If we say that average campsite occupancy in the Valley is 4.5 campers per site, and all sites are full, then there are actually 25% fewer campers (and 25% more camping capacity available) than the Plan indicates. That means there is room to add 25% more campsites without any need to change the overall campsite capacity allowance (i.e., campers' share of the total number of people allowed overnight in the Valley) in the Preferred Alternative. So 25% of the total 632 family campsites in the Preferred Alternative, or 158 campsites, could be added in the Valley without requiring any change in the overall overnight capacity assigned to Valley camping in Preferred Alternative 5. ... We therefore ask ... that the number of family campsites in the Valley be increased by 25%, or 158 campsites, to maintain the same overall overnight capacity for camping in the Preferred Alternative.

(Individual; Correspondence #3690)

Response: "Alternatives" (Chapter 8) summarizes the proposed changes to numbers of camp sites in the Merced River corridor. There are 565 camp sites currently located in the river corridor. Under Alternative 5 (Preferred), 516 of the existing sites would be retained, and 250 new camp sites would be added. The total number of sites in the river corridor will increase to 766.

Concern 365: The NPS should construct more auto-based tent campsites in Yosemite Valley, as opposed to additional walk-in or RV-based camping.

Additionally, if you are trying to enhance the pristine wilderness, why add an RV camp ground? the beauty of Yosemite is the tent camping, cabins and the cabins in other areas that can be rented. If anything make more tent camping areas.

(Individual; Correspondence #353)

Response: Of the 565 existing campsites located in the river corridor, 505 (89%) were originally designed and constructed to allow full automotive access. The percentage of auto-based sites increases in designated campgrounds outside Yosemite Valley.

A preponderance of comment letters indicates that visitors would use walk-in campsites if more were made available. Walk-in camping allows clustered visitor parking, requires no pavement for an internal circulation system, and is therefore a more compact, sustainable, and efficient use of park land.

RV camping is currently permitted in any of the automotive sites where the parking pad is large enough to accommodate the vehicle. RVs are typically equipped with generators that emit noise and exhaust. By constructing Yosemite Valley's first and only designated RV campground loop, the park will be able to provide electrical hook-ups and eliminate noise and exhaust from 36 RVs, thereby helping maintain the Valley's air quality and natural soundscape.

Concern 366: The NPS should construct additional walk-in campgrounds in Yosemite Valley.

I would also like to address more backpacker walk-in type camps in the Valley...much needed.

(Individual; Correspondence #25)

Add walk in campgrounds to the Valley.

(Individual; Correspondence #41)

Suggest:

-establish more walk-in campsites such as Camp 4; they allow more density with reduced car traffic, and encourage bringing less equipment (e.g. radios, generators, etc.)

(Individual; Correspondence #916)

Response: "Alternatives" (Chapter 8) quantifies the numbers of sites that would be subtracted or added to campgrounds. Under Alternative 5 (Preferred) these numbers include net gains of walk-in sites at the following locations and in the following numbers: Backpackers, 1; east of Camp 4, 35; east of Upper Pines; 49 (plus 2 group sites); at Upper River, 30 (plus 2 group sites; and at Lower River, 30.

Concern 367: The NPS should consider constructing additional campgrounds in areas where campgrounds don't currently exist.

There could also be new walkin campsites in the concession stables area where dilapidated stable and housing infrastructure in the river corridor should be removed. ... Following removal of the dilapidated stables and associated employee housing units, North Pines campground could be expanded, where appropriate, for additional camping.

(Individual; Correspondence #1818)

However, the MRP needs refinement and I propose the following improvements to Preferred Alternative 5:

Increase camping opportunities at locations such as east of the Ahwahnee Hotel, at the former Lower River Campground, and east of the Concessioner Stable adjacent to the road/paved path heading to Mirror Lake.

(Individual; Correspondence #1964)

Increase camping opportunities at locations such as east of the Ahwahnee Hotel, at the former Lower River Campground, and east of the Concessioner Stable.

(Individual; Correspondence #1972)

Camping: Should be expanded in Yosemite Valley by re-using/re-purposing areas already impacted by development such as the concessionaire stables area and Housekeeping Camp [that could be easily re-developed as new campground with drive-in sites;

(Individual; Correspondence #3325)

Response: These sites were all evaluated for campgrounds in the initial preparation of the MRP. Potential campground locations were analyzed by an interdisciplinary team using criteria related to resource protection, proximity to infrastructure, land use conflicts, existing disturbance, and objectives related to visitor experience. All of these locations were duly considered, and while many are evaluated across the range of alternatives, others were dismissed from further analysis due to one or more of the criteria noted above.

Concern 368: The NPS should consider alternative campground styles to meet high demand for camping.

Campground Idea

Goal: to meet the high demand for camping

What the park does not want:

- *a campground that requires too much oversight, regulation and facility maintenance*
- *a campground that creates negative visual impact*
- *more campfires adding to Valley pollution*

Solution: a large-capacity, bare-bones seasonal overflow walk-in campground primarily for climbers and campers who would otherwise be turned away from the park

Though a 37% increase in camping capacity will go a long way toward alleviating excess demand for camping in Yosemite Valley, it will most-likely not be enough to meet total demand. A solution could be a designated, marked "camping area" without individual sites and without capacity limits. This would concentrate impact in one area and allow revenue capture from a population that would otherwise only provide entrance fees.

Characteristics of the "camping area"

- People can set up a tent or sleep out wherever there is space.

-Large parking area to accommodate expected amount of overflow to the camping area.

- To minimize pollution, campfires would not be permitted

- Pay-per-gallon water dispensers to offset cost of campground

- One large toilet facility with garbage and recycle bins.

- Separate cooking area close to the parking area to minimize noise pollution to those trying to sleep. Bear boxes would be co-located with the cooking area so that people could easily move food from cars to bear boxes and from bear boxes to cooking.

- People are not permitted to leave their tents/sleeping area set up- everyone must be entirely out by 11 am and cannot set up until 4 pm. This will maintain the feeling of the camping area solely being an overflow, second-best solution and will create incentive to use the other facilities first.

- The camping area does not have to be conveniently located. It can be tucked almost anywhere because it is a second-best option. It could even be on the way out as a way of encouraging people to use other facilities first.

- If the camping area is even slightly inconvenient, it makes regulation easier because people can self-pay and hang a tag in their car, then you can simply charge by the car, not by the person/site/etc. Price this camping option similar to Camp 4, so people will still use Camp 4 as the primary climbers' campground.

(Individual; Correspondence #1966)

[Campground Idea continued from 318059]

Even a modified version of the above would be very helpful for the climbing community. An extremely low-resource option could be that instead of a campground/cooking area/parking area combo, the park develops a large parking area with bear boxes and a bathroom where people are allowed to sleep in their cars- no tents or RVs. Same idea with self-pay and a hangtag. It would be easy to administer and would provide a solution that works for climbers while freeing up space in other campgrounds for people who want a more classic camping experience and care about the quality of campground instead of simply having a place to sleep.

(Individual; Correspondence #1966)

Response: Comments are presented as theoretical constructs that do not describe specific sites, making it difficult to understand how or what resources might be affected. There is no amount of unused or unplanned land in Yosemite Valley. Portions are comprised of wetlands, meadows, and talus slopes subject to rock fall. The MRP generally limits proposed construction or land use changes to locations where the underlying sites have been disturbed in the past. Remaining park lands need to be preserved, maintained, protected or enhanced in order to protect river values and other natural and cultural resources.

The NPS ceased to allow dispersed camping in Yosemite Valley and established delineated campgrounds and campsites in the late 1940s. This action became necessary in order to protect natural resources, such as

the meadows and oak woodlands where people might otherwise camp. Protection of the park's natural and cultural resources remains paramount.

Concern 369: The NPS should not relocate campsites out of the riparian buffer away from the river.

> *However, please do not decrease the number of campsites available for the guests. I believe this is one of the best ways to experience the park and would increase the likeliness a guest would stay in a lodge, instead of a tents.*
>
> (Individual; Correspondence #59)
>
> *As camp sites become tougher and nearly impossible to reserve, this plan to eliminate campsites seems inappropriate and detrimental. I would think we would want people to experience the park in a way that truly immerses them in the wonder of what the park has to offer. Let this park build a space within the hearts of the people visiting and help them understand why this park is worth preserving. Do not eliminate campsites. Help ensure accessibility to these wonderful experiences.*
>
> (Individual; Correspondence #1915)

Response: Park managers have long sought to remove campsites from ecologically sensitive locations on river banks. The 1980 GMP states that, "Some sites will be relocated to zones more suitable for man's activities in order to protect sensitive resources and increase manageability." One of the stated goals of the GMP is to, "Remove facilities that are sources of impact on riparian areas." The MRP brings these concepts forward in time to minimize riverbank erosion and sedimentation loading of the Merced River, and to protect and enhance ORVs. A comparison of the number of existing campsites and the number proposed in Alternative 5 (Preferred) indicates that the supply will increase by 36 percent within the river corridor.

Concern 370: The NPS should minimize impacts from the proposed Eagle Creek Campground by designing it as a walk-in facility with minimal campfire rings.

> *[However, the MRP needs refinement and I propose the following improvements to Preferred Alternative 5:]*
>
> *I am concerned by the proposals for new developments in the West Valley, which is now relatively undeveloped. If Park planners do elect to develop a new campground at Eagle Creek and overflow parking lot at El Cap Crossover, the MRP should minimize new impacts especially as uniquely viewed/heard from above by climbers. For example, the Park could establish Eagle Creek as walk-in only campground and limit the number of campfire rings to limit smoke. Likewise, the Park should ensure the new overflow parking lot preserves as many trees as possible.*
>
> (Individual; Correspondence #1964)
>
> *I would also like to suggest that the proposed Eagle Creek campground be made walk-in, to reduce the noise, smoke, pavement, and visual impact.*
>
> (Individual; Correspondence #2258)
>
> *I am opposed to new developments in the West Valley, which is now relatively undeveloped. If necessary, the Park could establish Eagle Creek as walk-in only campground with no fire rings.*
>
> (Individual; Correspondence #2600)

Response: Due to overwhelming public opposition to the concept of development of parking and camping in the West Valley, the Eagle Creek Campground has been eliminated from the Alternative 5 (Preferred).

Concern 371: The NPS should provide further explanation about how traffic congestion associated with new and expanded campground development will be mitigated.

> *Upper Pines Campground is very large now and Alternative #5 will expand that size. We are concerned with the overcrowding and heavy traffic with only one entry and exit. Are there plans to provide additional entry/exit facilities for the Walk-in Campsites?*
>
> (Individual; Correspondence #2199)
>
> *During a Webinar, a reason given for the Eagle Creek location was that traffic studies suggested that since the campground would be on the way out of the park, that location would help with traffic flow. However, this assumes that the campers going to that site will park their vehicles and not drive back to the East Valley where services and activities are located. Some people might not be able to walk to where the services and/or activities are and the shuttle is scheduled to only run every 60 minutes. Riding a bike against traffic on Northside Drive is prohibited so people would have to ride to the El Cap Crossover and then backtrack on Southside Drive. Therefore, people might find it is easier and faster to drive to the East Valley.*
>
> (Individual; Correspondence #2460)
>
> *I believe the majority of the traffic problems that exist today are because there are not enough camping sites. People have no choice but to visit the park for a day. When people camp they are more likely to park their car and walk, bike or use public transportation.*
>
> (Individual; Correspondence #2547)

Response: The MRP Preferred Alternative increases the number of available campsites in Yosemite Valley by 37%. Transportation scenarios that were used to evaluate the effectiveness of the transportation system for each alternative took the proposed expansion of the campgrounds into consideration. In the design and implementation of each new campground, planners will take into account the need for multiple entries and exits from these areas to reduce congestion.

Concern 372: The NPS should address the need for additional equine friendly campgrounds.

> *In addition, the DEIS fails to address parking at trailhead and camping areas for stock/horse trailers. There is no discussion of the quantity of, or the need for, increased horse camping even though such a need has been identified in recent recreational use projections documented by the U.S. Forest Service (see 'Outdoor recreation trends and futures',http://www.srs.fs.usda.gov/pubs/40453.)*
>
> (Individual; Correspondence #2912)

Response: Equestrian facilities are currently provided in Bridalveil Campground and in the stock camp in Wawona. The park's existing campgrounds were defined and delineated about 60 years ago, and cannot be retrofitted without the loss of existing camp sites and facilities to accommodate equestrian amenities such as oversized vehicle circulation and parking, a turn-out ring or corral. The Merced River Plan proposes to add walk-in camping and RV sites in places where access is limited by topographic and other constraints that would make those sites much more difficult to improve for use dedicated to equestrians and their horses.

Yosemite Valley does not have designated trailhead parking except for the Wilderness Parking area between Curry Village and Happy Isles. Trails on the Valley floor remain available to equestrian use. Oversized vehicles (including trucks with horse trailers) may park at Yosemite Lodge and in Wawona.

The MRP is intended to address only those lands within the river's corridor. Its completion does not preclude the development of equestrian sites in other areas of the park, but this would be beyond the scope of the park's current planning efforts.

Concern 373: The NPS should not expand campground development near riparian areas in Yosemite Valley.

> *Camping is the best way for folks, especially those unfamiliar with nature, to experience Yosemite. Unfortunately camping has enormous impact on ecosystems, especially in sensitive riparian corridors. Expanded camping development will lead to more social trails, erosion, reduced water quality, reduced wildlife habitat, invasive plant species encroachment. I believe camping should be discouraged in riparian areas, and certainly not expanded.*
>
> (Individual; Correspondence #1479)

Response: The river plan includes a corridor-wide, 150-foot riparian buffer in which some existing development, including revetments, rip-rap and campsites, will be removed and natural resources will be restored. No new campground construction is proposed within 150 feet of the river's ordinary high water mark.

Concern 374: The NPS should expand the proposed riparian buffer to include the area within 200 feet of the river to be consistent with other federal land management agencies and Leave No Trace principles.

> *The Park should adopt a 200-foot buffer from the River to maintain the same standards it encourages recreational users to adhere to and that other public land management agencies require for campsite setbacks*
>
> *The Leave-No-Trace principles that the Park encourages its backcountry users to follow states "protect riparian areas by camping at least 200 feet from lakes and streams." BLM and USFS also encourage or legally require their public land visitors to camp at least 200 feet from any water source. For the Park Service to encourage visitors to adhere to this, but then continue to allow a wide range of impactful uses within that buffer is both illogical and unjustified. The Preferred Alternative inappropriately allows campsites and other facilities or uses to be allowed to as close as 100' from the river. CSERC points out that to be consistent with federal land policies of other agencies and even Yosemite Park in backcountry use, the distance of 200' is necessary for a buffer. Should the Park decide that a compromise is needed to balance resource protection with the high demand for campsites within Yosemite Valley, then at the very least a distance of 150' from the high water mark should be excluded from having any campsites or other development.*
>
> (Individual; Correspondence #3404)

Response: The effective width of a riparian buffer depends on the steepness of the local topography, the floodplain extent, soil type(s), vegetation type(s), local wildlife species, and the nature and extent of human land use. As a result of these numerous factors, as well as the inherent variability and complexity of river system processes, there are no singular, generic standards for riparian buffer widths. Review of scientific literature indicates a range of recommended buffer widths, with values generally ranging between a minimum of 30 feet and a maximum of 300 feet; typical values fall between 50 and 150 feet. The National Park Service evaluated a range of buffers from 50 to 300 feet and selected a 100 foot buffer in areas of existing development. A 100 foot buffer is protective of river values. A 100 foot setback for camping in Yosemite Valley is consistent with regulations for wilderness camping in Yosemite, which require that campsites be at least 100 feet from water, unless the terrain permits no other options (Superintendent's Compendium). Alternative 5 (Preferred)calls for a riparian buffer of 150 feet in areas of potential future development in Yosemite Valley.

Concern 375: The NPS should construct improvements to existing campsites and campground layouts at Camp 4.

> *Site layout and materials - The campsites [at Camp 4] themselves could use a real overhaul to reduce impact and increase usability. The park should consider raised tent pads that can accommodate the number of tents allowed per site as well as more clear division between sites. Campsite posts to handle registration tags should also be considered. Ultimately, these improvements will streamline the hard work of park staff to manage this highly active and popular campground.*
>
> (Individual; Correspondence #3694)

Response: These suggestions have been forwarded to the park's campground management staff. Implementation of minor improvements or site delineation can occur separately from the Merced River Plan.

Concern 376: The NPS should construct additional camping in already disturbed or developed areas.

> *We believe that the MRP should increase camping even more by restoring as much camping as possible to sites that have already been disturbed such as the Rivers Campgrounds that were damaged in the 1997 flood. The Lower Rivers Campground, in particular, could be engineered with a minimal footprint for walk-in sites. These sites could be designed in a way that would not impair river values and with the recognition that they will again be flooded. Additional camping options not included in Alternative 5 that are both out of the floodplain and rock fall hazard line include proposals in Alternatives 4 and 6 for 40 walk-in sites at Lower River, 41 drive-in sites at Boys Town, 41 drive-in sites at the Concessioner Stables, and 2 group sites at Upper River. Alternative 3 also proposes removing Yosemite Lodge units from the flood plain that we believe offer the possibility of additional camping. We also believe new camping could be provided at "Kinneyville" east of the Ahwahnee Hotel, and at the Medial Moraine east of the Concessioners Stable.*
>
> (Civic Group; Correspondence #3689)
>
> *We have asked for more camping on the condition that it be located on land currently developed. We think that re-purposing some of the developed areas of Yosemite to support camping would be real progress. The DEIS takes the other approach, and generally puts new camping on currently undeveloped areas, and never in light of real choices about re-purposing land to accommodate camping.*
>
> *We observe that the best locations for camping are currently occupied by other uses. Within the Impact Analysis, the NPS should justify all continued use of existing facilities occupying the land needed for additional camping. It should then make proposals for new camping to replace un-needed development.*
>
> *We recommend that the DEIS remove the Concession Stables and site camping there. The horses cause direct impacts to songbirds, soils, water quality, cause visitor conflicts, and support the Merced lakes HSC (which, like the horses at the stable, degrade important values of the Merced WSR as discussed elsewhere).*
>
> *We recommend the removal of the current Yosemite Lodge, and its conversion to camping.*
>
> (Individual; Correspondence #3693)

Response: All of the campground locations suggested in the representative quotes were analyzed in the range of alternatives, or considered but dismissed during planning team deliberation. The sites that were dismissed prior to publication of the *Draft Merced River Plan/EIS* were evaluated based a number of criteria, including resource constraints, infrastructure availability (water and sewer,) land use conflicts, and topography. The proposal for a campground in West Yosemite Valley has been dismissed from Alternative 5 (Preferred). The amount of camping proposed across the range of alternatives for the *Final Merced River Plan/EIS* varies from 521 sites under Alternative 2 to 925 sites in Alternative 6.

Concern 377: The NPS should prioritize camping opportunities over permanent lodging facilities.

We believe that the MRP should begin to shift the camping-lodging ratio in the Valley to provide more camping opportunities. The Management Object for Recreation16 in the Plan and NPS Management Policies for Visitor Use17 both encourage activities such as camping that bring visitors into a direct relationship with park resources. Our proposal would accomplish these policies by adding 204 new individual and 2 group campsites to the 640 in the Preferred Alternative, bringing the total for the Valley to 846. This total is less than the Baseline of 872 sites but more than the General Management Plan's proposed 756 sites. If an equivalent reduction were made in lodging units, the total number of lodging units in the Preferred Alternative would decrease from 1,053 to 847. This would change the camping/lodging ratio in the Valley from the Proposed Alternative's 38% camping and 62% lodging to almost equal numbers of each. This is a move in the right direction, but still well short of the 60% camping to 40% lodging ratio we think the Preferred Alternative should achieve to realize the Recreation Management Objective for the Plan and to comply with NPS Management Policies for visitor use.

(Unaffiliated Individual; Correspondence #3690)

Response: The Merced River Plan provides a wide range of recreation and access opportunities for visitors of all ages and abilities. The plan does not prioritize one type of overnight accommodation over another, as both camping and lodging are valid ways to experience the river corridor. In the revised Alternative 5 (Preferred), 51% of all overnight visitors in Yosemite Valley would be in campsites, and 49% would be in lodging. For every 1 campsite there would be 1.7 hotel rooms.

Concern 378: The NPS should characterize the camping component of the Recreation ORV as having a segment-wide management concern based on the reduction in campsite inventory since the time of designation.

The Plan should give greater importance to the loss of Valley campsites as a significant problem. The Baseline Report characterizes the loss of half the Valley's campsites as a "Management Consideration." This is the lowest category of threat to an ORV, one that applies where the value is currently in a "protected state" and presents only a "localized area of impact" and "can be corrected with relatively simple actions."Clearly, Valley campsites are not in a "protected state" since over 300 were removed from the Rivers campground with no NEPA compliance or public process, and the Plan has not recognized the policy reasons for according priority to camping over lodging in allocating space for overnight accommodations sufficient to replace these lost campsites. Second, campsite losses since 1987 are not a "localized" issue since such losses cover the entire length of the Valley portion of the river segment, which extends from Sentinel Beach to Nevada Falls. These losses include: 20 campsites at Muir Tree (below Sentinel Rock), three at Camp 4, 14 at the former Group Camp, and the rest at the Upper and Lower River and Upper, Lower and North Pines campgrounds. Given the significance of the Valley to the Recreational segment, camping losses should be characterized as segment-wide.

(Unaffiliated Individual; Correspondence #3690)

Since the loss of half the Valley's campsites is not just a local matter nor a simple matter to correct, and as a Management Consideration it received only modest consideration, it should be elevated to the next level, which is the Management Concern. This applies when a value is not currently protected, the concern reflects a segment-wide condition or a "downward trend" that is "able to be immediately addressed" when a triggering condition is reached.32 As explained above, we believe campsites are not protected, that the loss of campsites is segment-wide, that campgrounds have been on a downward trend as to both numbers and conditions, that the loss of half the Valley's campsites should be a triggering condition, and that the loss can and should be immediately addressed in the Plan.33 And for such an effort to be effective, it must embrace the policy considerations that support the expansion of camping, not simply view the provision of more camping as a facilities issue.

(Unaffiliated Individual; Correspondence #3690)

Response: The Recreational ORV 20 for Yosemite Valley focuses on the variety of outstanding opportunities for front-country river recreation for people of all ages and abilities. Activities that occur along the river include hiking, biking, swimming, floating and water play, climbing, camping, or fishing. In addition, creative pursuits such as writing, painting, photography, other arts and educational and interpretive pursuits such as attending ranger-led walks and programs comprise the variety of activities visitor enjoy in the presence of the magnificent scenery. Because this river value is not quantitatively based – and rather based on the variety of available recreational experiences – the decrease in the amount of camping since the time of designation was not identified as a driving management concern for the river value because the opportunity to camp in Yosemite Valley remains available. However, the range of alternatives explore opportunities for increased camping within Yosemite Valley and the final preferred alternative increases camping in Camp 4, Upper Pines, and the Upper and Lower River Campgrounds.

Visitor Facilities—Picnicking

Concern 379: The NPS should restore the El Capitan Picnic Area to a more natural recreation site in order to enhance ORVs in scenic Segment 2B.

> *MERG also requests that NPS consider restoring the existing El Capitan Picnic Area in the West Valley to a more rustic/natural recreational site in order to enhance the ORVs in this segment. (see above photos).*
>
> (Civic Group; Correspondence #8330)

Response: In 1992, the former El Capitan picnic area was closed and actions to restore the riverbank began. The picnic area was relocated in 1994 to the current location, away from the river bank, and in an upland location. The purpose of this relocation was to protect river values, including removing 300 feet of riprap and revegetating the terrace and banks. Currently, the picnic area includes minimal infrastructure to support picnicking. Picnic tables, parking, grills, and a vault toilet currently exist at the site.

Visitor Facilities—Trails

Concern 380: The NPS should improve and expand bike paths within the park.

> *Upgrade shared use paths (paved bike trails) to current AASHTO and MUTCD design standards,*
>
> (Individual; Correspondence #1674)
>
> *The existing bikeway network, and the prominence/status it is given in the Park, is really rather poor and as a result bicycling is a significant under-performer in your mix of transportation solutions. The facilities need to be brought up to current national bikeway design standards, at the very least. The Grand Canyon Greenway and the trails system in and around Grand Teton National Park stand as excellent examples of what is possible.*
>
> (Individual; Correspondence #1838)

Response: The bicycle paths are among Yosemite Valley's most recently-constructed facilities, designed and completed between 1980 and 1995. The existing paths augment circulation around the east end of the valley, where there is a concentration of visitor use facilities, including lodges, hotels and campgrounds. The bike paths were intended to provide a separate path of travel for the safety and enjoyment of park visitors. They were designed and improved according to the minimal standards in effect at the time of construction, so as to limit damage to the park's natural resources. The NPS does not believe these existing facilities require further attention under the river plan.

Concern 381: The NPS should extend the multi-use trail to the West Valley area.

I also feel the bike paths should be expanded to the entire valley on the west side.

(Individual; Correspondence #71)

I also feel that the existing walking/biking trail should be extended to the loop road which connects to Bridal Veil area.

(Individual; Correspondence #1321)

Response: Please see response to Concern 383.

Concern 382: The NPS should improve trail clearing and maintenance.

With "sightseeing" and "hiking" at the top, it is my opinion that trail clearing should be high priority.

(Individual; Correspondence #442)

Because hiking is one of the higher percentage of visitor use items on your list, trail clearing should be started as early in the season as possible with as many crews as it takes to get the job done in a timely manner.

(Individual; Correspondence #443)

The park service needs to spend its time and effort on the trails. Especially the broken up asphalt and poor trail bed on the Panoramic and the John Muir trail from the falls to the valley. It is dangerous and hikers are at risk for injury on that trail. The asphalt needs to be removed and a new trail bed put in that isn't just a pile of rocks like you have now.

(Individual; Correspondence #539)

Response: The recommendation to focus additional park resources maintenance of existing trails is a level of detail not addressed in this plan. However, the NPS has a comprehensive asset management plan that prioritizes the repair and cyclic maintenance of all facilities within the park. The operation and maintenance cost associated with new development is a consideration when determining the consequence of proposing new assets. In most cases, new developed proposed is replacing existing development that is very costly to maintain and operate due to its age; therefore the maintenance of these assets would be adequately prioritized and funded in accordance with the park's asset management plan.

Concern 383: The NPS should harden the existing Valley Loop Trail to improve visitor experience and offer a safer way for pedestrians and bicyclists to circumnavigate Yosemite Valley.

We also suggest the Park proceed with the valuable idea of "hardening" the existing Valley Loop Trail to offer a peaceful and much safer way for pedestrians to circumnavigate Yosemite Valley with plenty of room for strollers, bicycles. In emergencies, this trail could also be used by search, rescue, and medical personnel

(Individual; Correspondence #7817)

Response: The Valley Loop Trail was originally constructed to accommodate hikers and equestrians, not bicycles. A bike path has specific minimum width and site-distance requirements that are not satisfied by current conditions along the existing historic trail. NPS staff believes that the trail cannot be adapted for bicycle use without the substantial destruction of cultural and natural resources. Under NPS policy, bicycles are permitted only on Class 1 bike paths and roadways.

The NPS is nonetheless testing a resin-epoxy based soil binder on a portion of the Valley Loop Trail. While this is currently an experimental treatment, the soil binder has the potential to stabilize the trail tread and

reduce erosion and to require less maintenance. The trail is already used by search and rescue and medical personnel and requires no improvement for their use.

Visitor Use

Concern 384: The NPS should encourage more overnight visitor use rather than expanding day-use parking.

> *Many times, I've heard the Rangers or other guides cite the statistic that the average time a visitor spends in the park is 6 hours. That always horrifies me as it takes me longer than that just to get to Yosemite. I wouldn't want to deprive anyone the chance to see Yosemite but shouldn't the Park be encouraging more overnight stays than expanding day-use parking? For visitors staying nearby in campgrounds or lodging outside the Valley or outside the Park, bus transportation into the Valley should be expanded.*
>
> (Individual; Correspondence #68)

Response: In the MRP, when visitors are characterized as "day-users" or "overnight users" they are being categorized by how they interact with the corridor and thus how they participate in the capacities relevant to the MRP. For example, a visitor staying in White Wolf is an overnight visitor to the park, but the MRP would count them as a day-visitor as they do not spend the night in the corridor. Thus, the expansions in parking for Yosemite Valley would accommodate all day visitors to this area, regardless of where they spend the night. However, NPS recognizes the demand for overnight accommodations in Yosemite Valley, and thus Alternative 5 (Preferred) increases the overnight capacity through a large increase in the camping inventory and a moderate increase in lodging.

Concern 385: The NPS should educate visitors about the impact visitor use has on the park and the river.

> *I think the impact of visitors use, should be looked at as an interpretive opportunity. Educating the visitors about the impact they have on the park or the river more specifically, would help. Raise the standard.*
>
> (Individual; Correspondence #2106)

Response: NPS interpreters and resource managers are engaged in ongoing efforts to share information, especially emerging science, about park resources with park visitors. Yosemite National Park's Long Range Interpretive Plan affirms resource protection and visitor education as a management goal. Indicators in "River Values and their Management" (Chapter 5) of the Merced River Plan / FEIS include education opportunities as proposed management actions associated with triggers that would be "tripped" if use increases or a higher degree of impacts occur.

Concern 386: The NPS should survey recreationists about the quality of their recreation experiences along the Merced River to inform and re-evaluate the effects of proposed actions on visitor experience.

> *Unfortunately, planners have opted to ignore the '82 Guidelines definition for user capacity which has as one of its filters that what is being proposed for recreation (e.g., camping, picnicking, hiking, biking, etc.) in the DEIS not have an adverse impact on the "quality of the recreation experience." As a result, recreationists along the Merced River were never surveyed as to how they view their experience ... Consequently, there is no baseline upon which to evaluate whether what is being suggested for camping in the preferred alternative will positively or adversely impact the "quality of the recreation experience" for these recreationists along the Merced River. Campers were never asked if exchanging the numerous decades-old drive-in sites for walk-in sites would actually "enhance" their recreational experience.*
>
> (Individual; Correspondence #1618)

> *There were no surveys of Park visitors to support public demand and preferences. Every opportunity was afforded them to walk and talk to visitors yet they chose not to do so. The public has to rely upon the Park's charts and figures of their best guesses as described by Kathleen Morse in her presentation.*
>
> (Individual; Correspondence #7820)

Response: NPS considered a wide range of research and monitoring studies regarding the quality of recreation opportunities, transportation, and visitor experiences in developing capacities for the MRP. These included studies on: general visitors to the park; wilderness and backcountry use; social impacts and recreation use in Yosemite Valley (including visitors at attractions like Yosemite Falls, trail users, boaters, and shore/beach users along the river); transportation impacts and modeling; and general monitoring of visitor and recreation use.

Collectively, these studies helped identify important user groups; activity participation; importance and quality of facilities; travel patterns; types of experiences; and evaluations of encounter levels or use densities at attraction sites, riverside beaches, boating segments, or road segments. They also helped assess relationships between use and impacts, and the acceptability of management actions that might be used to enhance experiences or address problems. To learn more about the research studies that informed plan development, please see "Glossary and Acronyms" (Chapter 12).

The information was used to identify a diverse range of indicators of recreation quality that include trail encounters in backcountry areas, and user densities at several attractions and shore or boating use areas in Yosemite Valley. Alternatives in the FEIS consider a range of recreation experiences, showing how different capacities and other management actions produce different conditions at these locations.

Campers were included in several studies, including those focused on use-related impacts along the river and at specific attractions in Yosemite Valley, although these studies did not focus specifically on preferences for different types of camping (e.g., auto-based, RV-based, walk-in, or backcountry). This planning process was informed by a wealth of public comment about camping preferences and experiences. Alternative 5 (Preferred) in the FEIS has increased the diversity of types of camping, without reducing the number of traditional auto-based campsites that currently exist.

Concern 387: The NPS should analyze the integrity of the data collected at traffic and trail counters.

> *Numbers Confusion .... Concerning counters at the entry gates, the following appeared on the NPS website reporting the Park's stats: "Six out of seven counters were out of service in May, only Arch Rock was operable" (May 2012). In April 2012, "only Big Oak Flat counter worked the entire month." In January 2012, the Tioga Pass counter "was out for 15 days." At a Science Symposium held in the Park, there was a report on trail counters; the question was asked if the counter included deer walking by'the answer was "yes." So where did all these numbers and mis-numbers come from and why have they been included in the Plan absent any verification or cross-checking??*
>
> (Individual; Correspondence #1618)

Response: The NPS routinely performs quality control checks on both traffic and trail counters to test for accuracy and performs statistical adjustments to raw counts to reduce errors and biases, when necessary. Road counters are checked frequently to make sure they are operating to minimize the loss of data, but they are sometimes out of service because of construction or equipment failures. Wildlife could pass trail counters, but this rarely occurs during daylight hours, and it occurs at a low enough frequency to be within the margin of error of the equipment.

Other Comments—Visitor Experience

Concern 388: The NPS should revise the plan to strike a more appropriate balance between providing a positive visitor experience and protecting resources.

> *It is important to preserve the historical cultural aspects of Yosemite as well as the natural. I feel that the current plan doesn't create enough balance between experiences and nature.*
>
> (Individual; Correspondence #93)
>
> *Keeping Yosemite an attractive place for a family vacation is part and parcel with maintaining public attachment to the valley and environmental integrity.*
>
> (Individual; Correspondence #2567)
>
> *I enjoy the solitude of Yosemite Back country, but I feel the draft plan for the Merced river will greatly diminish the Yosemite experience for the many visitors Yosemite Valley. I think a better balance needs to be found between allowing the activities that have become traditions in Yosemite Valley and protecting the river.*
>
> (Individual; Correspondence #2639)

Response: Under Alternative 5, a wide array of recreational and educational experiences will be provided throughout the river corridor. In Yosemite Valley for example, traditional family-oriented activities such as camping, picnicking, wading and swimming, ice skating, and bike riding will remain available to visitors. In addition, the NPS has added a cultural ORV for Segment 2 of the river. Alternative 5 provides for enhanced recreational experiences and ensures the protection of both natural and cultural resources.

Concern 389: The NPS should reduce commercialism and elements that contribute to an amusement park-like visitor experience in Yosemite Valley.

> *Oh please do everything you can to decrease the public amusement park like experience among the magnificent sequoias in California. I have not gone to Yosemite in decades because I feel badly about being there, being another exhaust producing driver and trail tramping walker among the far too many who are enticed to party all seasons in the woods. When did we decide to "use" these places without regard to the impact, as if they were convention halls that should accommodate constant amusement.*
>
> (Individual; Correspondence #239)
>
> *I don't think having a crowded visitor experience similar to visiting Disneyland can be considered having a quality experience with nature.*
>
> (Individual; Correspondence #1707)

Response: Comment noted.

Visitor Use—Access

Concern 390: The NPS should maintain rafting and horseback riding because it allows disabled visitors to access to specific areas of the park that would otherwise be inaccessible to this user group.

> *Rafting and horse back riding are the only ways my handicapped child has been able to see Yosemite. Not everyone can hike or backpack like I can in order to get past the crowds. Besides, the most beautiful way to see and enjoy the park is from a raft! I think it is a shame that this it is the goal of plan to limit accessibility for some people in Yosemite.*
>
> (Individual; Correspondence #42)

Response: The Merced River Plan provides a wide range of recreation and access opportunities for visitors of all ages and abilities. The NPS final Alternative 5 (Preferred) does not eliminate or reduce access for private equestrian use. Private equestrian use, commercial stock use Wilderness trips offered through commercial use operators, and day rides from Wawona provided by a concessioner all remain viable options for visitors seeking to access the park by equestrian means. Additionally, Alternative 5 (Preferred) has been revised to retain some commercial rafting, and private rafting is retained in all alternatives.

Concern 391: The NPS should retain Housekeeping Camp because it serves visitors of limited socioeconomic means.

> *Most families do not have the equipment for full camping with sleeping bags and tents. At Housekeeping Camp, all they need to do is bring some simple supplies everyone has in their home.*
>
> (Individual; Correspondence #65)
>
> *Please do not remove Housekeeping Camp. Just walk around the camp during the summer and you will see that it serves a major purpose of the National Park System--to open up nature to everyday Americans. And Yosemite is the prize jewel of them all. At Housekeeping Camp a family of severely limited means can have a beautiful and affordable vacation. Housekeeping camp has many young families, minority families, elderly people--all coexisting peacefully and happily. Please go and have a look any summer evening.*
>
> (Individual; Correspondence #65)

Response: The NPS worked diligently to provide a reasonable range of alternatives for the public to consider, and factored the important issues of accessibility and social equity into decision-making regarding that range. Housekeeping Camp is a location that demonstrates how each of the alternatives varies depending on specific goals for visitor experience and restoration objectives. While some of the alternatives propose the removal of all, or the majority of, lodging units at Housekeeping Camp, Alternative 5 (Preferred) proposes to retain all but 34 of the units. Those units are within the ordinary high water mark of the Merced River. Therefore, in the Alternative 5 (Preferred), 232 affordable lodging units at Housekeeping Camp would be retained.

Concern 392: The NPS should retain the ice skating rink because it provides a recreation opportunity for the under-served local community.

> *Keep the Ice Skating Rink. Our Children in Mariposa need to have it for Recreation!*
>
> (Individual; Correspondence #45)
>
> *And these activities, in particular the ice rink, give a VERY underserved community of children (Mariposa County) activities to enjoy in the winter. There is little to nothing for these children to do in a rural, remote county. Please consider at least moving the rink to another part of the park*
>
> (Individual; Correspondence #74)

Response: In the FEIS Alternative 5 (Preferred) an ice skating facility will be provided for seasonal use in Curry Village at a site outside the river corridor. This site is closer to the historic location of the ice rink that was first installed at Curry Village in 1929.

Concern 393: The NPS should maintain commercial horseback day rides to allow persons with disabilities to access portions of the park which they otherwise would be unable to access.

> *The DEIS should recognize that mobility impaired visitors have few options to access areas of the park other than by outfitted stock rides. Any proposed limits on stock use should be viewed in the context of the Americans with Disabilities Act, including zoning type restrictions that could preclude commercial*

horseback rides and thereby mobility imparied visitors from visiting popular or preferred destinations in the park.

(Individual; Correspondence #1983)

Response: While the NPS final preferred alternative eliminates the two-hour and four-hour commercial horseback day rides from Yosemite Valley, there are no limitations placed on private stock use. All trails currently open to stock use (commercial, administrative, or private) will remain open to stock use. Persons with disabilities or other mobility limitations will still be able to access portions of the park they would otherwise be unable to access through private or commercial stock.

Concern 394: The NPS should maintain a diversity of recreation opportunities in the Merced River corridor in order to maintain access for all visitors, including visitors who are disabled, elderly, or economically disadvantaged.

Yosemite should strive to be accessible to all people. That means, offering activities that even city-types that don't normally spend time in nature can enjoy. Truthfully, bike-riding and ice-skating are one of the natural bridges for families. They offer outdoor recreation but in a simple, non-threatening way.

(Individual; Correspondence #206)

In short, 95% of Yosemite is absolute wilderness and I love it that way. But I see no need to attempt to make that last 5% more wilderness-like when that's not going to happen anyway. Just accept that the Valley is designed to accommodate a wide range of people

(Individual; Correspondence #1018)

Many people will not be able to have the Yosemite Experience if they can't hike or walk. We feel that Yosemite is for Everyone, including minorities, those of modest means, the very young, the elderly, and the disabled, not just a select few.

(Individual; Correspondence #2325)

My primary concern is to preserve the natural beauty and resources of the park and as far as possible protect the public's access to them. Therefore planning for preservation of trails for pedestrians and wheeled vehicles such as wheelchairs and bicyclists in selected areas as are now available is desirable.

(Individual; Correspondence #2534)

I enjoyed the park in many ways including horse back riding, day hiking, back packing and winter cross country ski camping. Now that I am older and less physically able I still want to enjoy the park but will need to do more by horse back and car camping and less by back packing. Please keep Yosemite available to all users, especially those who are using traditional ways to benefit from Yosemite's great beauty.

(Individual; Correspondence #2537)

Response: The Recreational ORV described in “River Values and their Management” (Chapter 5), clearly states that the management objective Yosemite Valley is to "Provide for a diversity of high quality river-related recreational opportunities that allow visitors to directly connect with the river and its environs amidst the spectacular scenery of Yosemite Valley." These activities include "active pursuits such as hiking, biking, swimming, floating and water play, climbing, camping, or fishing; creative pursuits such as writing, painting, photography, and other arts; and educational and interpretive pursuits such as attending ranger-led walks and programs. Social elements, such as group camping and picnicking, are integral to many activities, while others offer opportunities for solitude and reflection. The Merced River in this segment allows people to immerse themselves in their surroundings, taking in the sights, sounds, and feel of the river and its dramatic backdrop." Alternative 5 (Preferred) proposes actions to maintain this diversity of recreational experiences and continue to serve all park users.

Concern 395: The NPS should not take any action in the Merced River Plan that would limit public access or enjoyment of the park.

> *Yosemite National Park is a national treasure that must be available for the American public to access and enjoy in the same manner that Americans have for decades. The 1864 Act authorizing the original Yosemite land grant to the State of California stated that the "premises shall be held for public use, resort, and recreation" and "shall be inalienable for all time." The draft plan in question directly contravenes the authroization, and I am firmly against NPS taking any action that would limit public access and enjoyment of Yosemite.*
>
> (Federal Government; Correspondence #2702)

Response: Comment noted.

Concern 396: The NPS should encourage the public to spend time in direct interaction with the resource instead of spending money at the resource.

> *there has always been concern that the Park was becoming an elitist enclave. ... With dinner-only Bracebridge Dinner tickets costing $825/two (Ahwahnee package deals, $2314), dinner-only tickets for Vintners' and Chefs' Holidays at $199, lodging at the Ahwahnee in the $500-$1000/night range, even a tent cabin in Housekeeping Camp at $100/night during peak season 'that's resort-style pricing rather than what one might expect to find at a publicly funded national park ... Transforming our national parks into concessionaire resorts creates inherent conflicts of interest ranging from capacity issues to preservation to revenue generation. Has the goal of the visitor experience at Yosemite transitioned from one of encouraging the public to spend TIME in direct interaction with the resource to instead spending MONEY at the resource?*
>
> (Individual; Correspondence #1617)

Response: Comment noted.

Visitor Use—Day-Use Reservations/Parking or Vehicle Permits

Concern 397: The NPS should require visitors to obtain a day-use reservation permit during periods of peak visitation.

> *Require permits for day entrance on weekends and holidays.*
>
> (Individual; Correspondence #43)
>
> *We need less people in the park at peak periods, go to day use reservations and limit areas of the park/valley at those times!*
>
> (Individual; Correspondence #70)
>
> *I support a day use parking reservation system during the overcrowded summer. It will eliminate the gridlock.*
>
> (Individual; Correspondence #2257)

Response: Please see response to Concern 398.

Concern 398: The NPS should establish a permitting system that encourages people to park their private automobiles and then use public transportation.

> *I believe much of the traffic congestion is caused by tourists using their cars to drive from place to place rather than walking, biking or using the shuttle. To solve this problem each vehicle entering the Park during peak season should be given a colored square (4'x4') to attach to the windshield. Ahwahnee Hotel (orange), Day Use (green), Lodge (red) etc. At the entrance gate visitors are told they must park in*

the proper area and LEAVE THE CAR THERE. It would be easy for a ranger or volunteer to scan a parking area. Green sticker in the Ahwahnee (orange) lot gets a ticket, etc.

(Individual; Correspondence #94)

You've obviously made it difficult to get Half Dome permits, why not do the same for vehicles and require a reservation system for taking your vehicle into the park. With this you can set the precise number of vehicles allowed in the valley at one time through the reservation system and allow a set number of "first come first serve" entries each day. Obviously, those with accommodations or employment in the valley will be able to drive in without reservations. You'll increase income by charging something like $2 per reservation and you'll reduce the amount of traffic and illegal parking. You can set up a shuttle system from highway 140, 41, and 120 to the valley for the day trippers and charge a rate for the shuttle to recoup the costs from missing the entry fees from the additional vehicles.

(Individual; Correspondence #2480)

Response: In the future, Yosemite may need to implement a day-use reservation system. Currently, limiting the number of vehicles at one time (VAOT) is a direct and efficient tool for managing day use in Yosemite Valley. Overnight use is already managed by the number of camping sites and lodging units available through reservations systems, but day use has no such restraints. Because over 80% of all current day users arrive by private vehicle, and there are stable estimates of the number of people per vehicle, limiting VAOT is an efficient tool for managing the largest portion of day use visitors. For the lower-use Alternatives (2, 3, and 4), day-use demand already demonstrably exceeds proposed capacities and would require a parking permit system to prevent use from exceeding alternative capacity levels. For Alternatives 5 and 6, day-use demand is currently near (or could soon exceed) defined capacities on multiple days each summer. In these alternatives, NPS will use the a traffic diversion at the El Capitan Crossover to ensure that capacity is not exceeded in the East Valley during peak season days. In the future, NPS would consider implementing a day-use parking reservation system if the traffic diversion at El Capitan Crossover is no longer sufficient or reasonable to manage the level of use experienced in East Yosemite Valley.

Concern 399: The NPS should require a reservation system for vehicles to enter East Yosemite Valley in order to manage visitation.

I also support a plan like that found in Alternatives 2 and 3 that would manage day-use capacity for East Yosemite Valley through permits and a reservation system during peak season. This goes hand-in-hand with having designated parking spaces. I think most day-users would adapt quickly to a reservation system and have a better park experience as a result. The reduced overall number of visitors would definitely help the river.

(Individual; Correspondence #336)

Visitors should require reservations to ENTER the Valley by auto.

(Individual; Correspondence #927)

A suggestion on how to handle summer and peak day crowds visiting Yosemite: RESERVATION REQUIRED:

Require a (free) reservation to visit the park, similar to what is required for backpackers. Those with a reservation are guaranteed entrance into the park on a specific day, all others are allowed entrance on a "first come, first served basis," until park reaches capacity. Establish a limited (and reduced from current levels) number of vehicles allowed into the park on any given day.

(Individual; Correspondence #1008)

... we support implementation of a day use parking permit system in east Yosemite Valley during the peak summer season.

(Individual; Correspondence #1890)

We believe a day use parking permit system in east Yosemite Valley during summer peak visitor use would be beneficial to facilitate visitor travel in the park.

(Individual; Correspondence #2070)

Response: Please see response to Concern 398.

Concern 400: The NPS should implement a day-use parking permit system immediately rather than allowing unacceptable conditions to continue.

The Preferred Alternative does provide that a day use parking permit system will be considered if there are two years of 14 days or more of gridlock after the Preferred Alternative is implemented. In other words, the current unacceptable conditions will have to continue at least 5 more years before the needed day use parking system may be implemented. This is unacceptable. The plan should call for implementation of a day use parking permit system next summer.

(Individual; Correspondence #1818)

The Sierra Club opposes the Preferred Alternative because it does not implement a day use parking permit system in the summer as described in Alternatives 2-4. Such a day use parking permit system is necessary to deal with the overcrowding and gridlock. ... Regulating day-use parking should be a fundamental element of this plan and an essential action to reduce environmental impacts, gridlock, and visitor frustration. The Preferred Alternative clearly fails to do that. To avoid the unacceptable consequences of unregulated access during peak periods, a day-use parking reservation system in the summer must be included as an essential, fundamental element of the final plan. Implementation would allow prospective visitors the opportunity to apply for a day-use parking permit that would guarantee access and afford visitors the opportunity to plan for an east Valley visit, days, weeks, or months in advance, an opportunity not available under the current proposal.

(Individual; Correspondence #1818)

... establish a day use reservation system now-it is patently obvious that one is needed. Your July, 2012 survey showed more than 50% of visitors surveyed felt crowded while driving, parking, riding the shuttle, hiking, biking, boating, and relaxing. The only activity where less than 50% of respondents felt crowded was while swimming in the river. In Yosemite, visitors already reserve rooms, wilderness access, cabins, campsites, tables in restaurants, and space on tours. The numbers of people who can stay overnight in Yosemite's wilderness has been limited since the 1970s to protect resources and ensure a high quality visit. We accept limits and the subsequent need for advance planning and reservations because they ensure our experience will be something special-something to cherish. Bite the bullet and do the right thing for Yosemite Valley: limit day use and institute reservations now.

(Individual; Correspondence #2273)

The second-tier "possible management action" [in Table 5-39] is to permit affected areas in the East or West Valley or to have a segment-wide permit system. Given that adverse impact to river values should be avoided and user capacity set to accomplish that mandate, why is NPS not selecting a permit system, given that exceedances are anticipated? The Final EIS must explain whether a permit system will only be instituted if the standards are violated or if user capacities are exceeded.

(Individual; Correspondence #8330)

Response: Please see response to Concern 398.

Concern 401: The NPS should establish an optional day-use parking permit system that would guarantee access for visitors who choose to obtain a permit; making the permit system voluntary would maintain freedom of choice and spontaneity valued by many visitors.

A day-use parking permit system would guarantee access, not deny it. For a long time we have been advocating that a permit system should be available for those who want to make use of it, but that it should not be mandatory. If a party arrives with a permit, they get in. If they don't have a permit, they

would probably be able to get in anyway, but they would be taking their chances. An optional system provides the best of both worlds<redacted>-guaranteed access for those who need that assurance, while preserving the freedom of choice and spontaneity which so many people prefer.

(Civic Group; Correspondence #3604)

The Park should consider an optional day-use reservation system which would enable travelers who are so inclined to reserve a parking space ahead, rather than face the chance that they will be diverted at the gate when the roadways and parking are full. A required confirmation on the day of use would keep the spaces available for actual visitors.

(Individual; Correspondence #3693)

Response: Please see response to Concern 398.

Concern 402: The NPS should identify actions they will take to reduce congestion during implementation of proposed parking and traffic circulation improvements, as conditions should not be allowed to deteriorate during the time it takes to implement a day-use parking permit system.

We are concerned that the system that determines the need for day-use permitting may take five or more years to implement. This would prolong unacceptable conditions that currently degrade the park visitor experience. We understand that the Park Service wishes to first implement traffic circulation improvements, parking adjustments, and other transportation improvements before considering whether a day-use permit system is needed. However, the Park Service should identify what actions regarding a permit system or comparable could be taken before all road improvements are made, as a way to reduce congestion during this period which could last 5-10 years.

(Civic Group; Correspondence #3566)

Response: As a part of the capacity management program, vehicles at one time (VAOT) will be monitored and managed as direct and efficient tool for managing day use in Yosemite Valley, as the pattern of use in this segment is relatively predictable during the busy summer season. The number of vehicles at one time for each alternative is listed in Chapter 6. The available VAOT may be adjusted during implementation as parking availability increases or decreases to ensure that conditions on roadways do not deteriorate to unacceptable levels. Please see Chapter 6 for a complete discussion of the User Capacity Management Program, which includes a section on "Interim Capacity Management" for East Yosemite Valley.

Concern 403: The NPS should model the number of vehicles that can be parked in existing endorsed parking places and circulating on existing roadways with acceptable levels of congestion in Yosemite Valley, and enforce a day-use limit based on that number of vehicles.

Why even allow an exceedance of these numbers? Why not just enforce a day-use limit and let the public know ahead of time how many cars can enter so that people might hop on buses in surrounding towns?

(Civic Group; Correspondence #8330)

Surely NPS can model how many vehicles can/should be let into Yosemite Valley based on the number of parking spaces and the number of vehicles it is acceptable to have circling.

(Civic Group; Correspondence #8330)

Response: Please see the response to Concern 402.

Commercial Operations

Concern 404: The NPS should consider imposing limits on recreation activities instead of removing them.

> *Yes, do clear campsites away from right by the river and limit the number of rafts and bikes because the river and the bike trails are overly crowded during the summer, but don't get rid of raft and bike rentals altogether.*
>
> (Individual; Correspondence #109)
>
> *I do not see the logic behind the section in alternative 5 of removing the commercial services. Restricting would be a much better idea, as has been done on backpacking out of the Valley (number of permits), and climbing Half Dome on the chains.*
>
> (Individual; Correspondence #1242)
>
> *Rafting and horseback riding could be permitted on alternate days. This would allow persons who wish to do both to do so but would also limit the total number of persons doing so.*
>
> (Individual; Correspondence #1344)

Response: The NPS has re-considered the removal of some of the recreational activities that were proposed in the Draft MRP/EIS and many activities will remain in Alternative 5 (Preferred). When evaluating capacities and uses in the MRP, the guidance from WSRA and the Secretarial Guidelines is to analyze both *kinds* and *amounts* of use. In some cases it is effects resulting from the *amount* of use that necessitates an action in the plan. For example, the activity of boating is a *kind* of use that is compatible with the goals of the MRP; however, the number of boaters in a river segment influences how that use may impact the biological or recreational ORVs, so that use may need to be managed in some cases. In other cases, it is the *kind* of use that is in conflict with goals of the MRP. Please see "Alternatives" (Chapter 8) for a complete discussion of activities retained under Alternative 5 (Preferred) and "Development of Lands and Facilities" (Chapter 7) for the Facilities and Services Analysis.

Concern 405: The NPS should encourage affordable recreational activities such as bike rentals, raft rentals, and ice-skating, rather than eliminating these visitor services.

> *Why do you always cater to wealth (I see Ahwahnee is not effected or mentioned) while rafts, bikes, ice skating (all low-cost family fun) etc get single[d] out for restriction.*
>
> (Individual; Correspondence #41)
>
> *Do not allow the environmentalists to eliminate all the recreational possibilities for the middle class. People need to bicycle, ice skate, and rent rafts, and they should be allowed to do so. There are few places where recreation for the middle class is possible and our national parks are some. They should be permitted to continue despite the plans by the NPS.*
>
> (Individual; Correspondence #73)
>
> *Definitely keep bike rental, swimming pool, horseback riding, grocery shop, nature shop as these activities allow people to experience being in Yosemite in various ways. Many of these activities are essential for families/kids.*
>
> (Individual; Correspondence #3551)

Response: The NPS will retain affordable recreation activities such as bike rentals, raft rentals, and ice-skating in Yosemite Valley in the final preferred alternative; however these operations will be relocated outside the river corridor.

Concern 406: The NPS should revise and clarify how commercially guided mountaineering climbing services are treated in the Determination of Extent Necessary (Appendix L).

> *Due to the increasing numbers of climbers who, for various reasons are not able to learn all of the skill sets involved in this lifetime sport, there is a corresponding need for professional mentors – the credentialed mountain guide. It takes year or decades to develop the skills and judgment to independently operate in committing multi-pitch rock terrain. Style preferences, risk tolerance, skill level, terrain knowledge and equipment expertise vary widely amongst the public. The AMGA believes the public must have the option to experience the outdoors in a style that is appropriate for them. For some, the use of a non-profit or for-profit guide service is an essential option in order to experience the wilderness safely and responsibly.*
>
> (Individual; Correspondence #3288)
>
> *We would also like to provide specific comments on the language utilized in the Determination of Extent Necessary.*
>
> *- In section 5C, under the exception to educational provisions, we respectfully disagree with its premise. While Leave No Trace should be a prerequisite for all wilderness visitors, not all visitors to Yosemite Wilderness are even aware of the existence of such a program or ethos, nevertheless the subtleties and practice of it. Guides are a crucial interpretive conduit of the LNT ethic to the public.*
>
> (Individual; Correspondence #3288)
>
> *Section 8A(1) [of the Determination of Extent Necessary] requires any permit holder, be it concession, CUA, or SUP, to submit "proposed itineraries by May 1 or as soon as possible" for a lottery for use that summer. Any itineraries submitted later would be allocated on a first-come, first-serve basis under the same criteria as the lottery. While this may be a practical system for a pack outfitter who plans regular group trips, it seems inflexible for smaller operators who may serve walk-in (or last minute) visitors, such as the climbing school. We would like to see this clarified in a favorable manner.*
>
> (Individual; Correspondence #3288)

Response: The Wilderness Act bans all commercial activity in designated Wilderness unless it furthers one of the purposes of the Act. Commercial activities that teach rock climbing do indeed further the educational purpose of the act, so they are allowed to the extent necessary. The Act does not list the amount of impact of a given activity as a criteria for determining the extent necessary. Such considerations are included in the analysis, however in the "minimum requirement" and "process for allocating trips" sections. The Act also does not list the public demand for an activity as a criteria for determining the extent necessary; rather, allowable commercial activities are allowed only to the extent necessary to further the Act's specific purposes.

The NPS agrees that many wilderness visitors need education in the techniques of Leave No Trace, and for that reason has determined that teaching Leave No Trace techniques is a required component of all commercial activities to be allowed in the Yosemite Wilderness. However, teaching only Leave No Trace ethics does not, in and of itself, constitute sufficient educational purpose for a commercial use to be allowed.

Finally, regarding walk-in groups, the policies set forth in the Determination of Extent Necessary provide sufficient latitude for such groups. Implementation policies will provide further details on how such requests will be handled. Such groups, however, must meet the criteria outlined in the Determination of Extent Necessary for commercial groups to be allowed in the Yosemite Wilderness.

Concern 407: The NPS should revise the socioeconomic analysis to factor in the loss of commercial recreational activities and any subsequent effects on visitation and economic vitality of the region.

> *We believe the major flaw in the socioeconomic analysis is that there was no study of the reduction in recreational activities on Yosemite's visitors. The basics are quite simple: You can ride a horse---if you own one. You can ride a bike---if you own one. You can raft ---if you own one. Even if you owned one of the necessary pieces of equipment, one must then add a vehicle capable of carrying the appropriate equipment (sorry if you came by bus) to the mix. Make it a family of four and the issue compounds. Underserved populations are less likely to be able to afford the capital investment necessary to participate in these activities so will be burdened disproportionately with the elimination of rental options.*
>
> (Business; Correspondence #2819)
>
> *... we believe that any growth (which would be into shoulder seasons because of the day use limits) would be augmented by the retention of the commercial recreation services and retail offerings currently provided. This is particularly true in that the services are seasonal and do not add value as visitation expands outside the peak summer period. If there truly is a 3% annual growth in visitation, the continued presence of these "in the park" services and activities will only add to the economic vitality of the region. It is counterintuitive to believe otherwise and we believe the analysis is in error. ... the major flaw in the socioeconomic analysis is that there was no study of the reduction in recreational activities on Yosemite's visitors.*
>
> (Business; Correspondence #2819)

Response: The Chapter 9 Socioeconomics section considers the relative regional economic impact of visitor spending patterns across each alternative. Changes to these spending patterns are driven, in large part, by the number of people expected to visit the park across the various alternatives and the mix of lodging opportunities. The socioeconomic analysis in Chapter 9 has been revised to clarify that elimination of some commercial recreational services could reduce the desire for some to visit the park, which would have a slight adverse regional economic impact. At the same time, the analysis assumes that such a reduction in commercial activity within the park may serve to attract other visitors. Since publication of the Draft MRP/EIS, the preferred alternative (Alternative 5) has been modified to retain or relocate within the park (but outside the river corridor) some of the commercial recreational services enjoyed by park visitors (e.g., bicycling, rafting, and ice skating) but previously identified for removal (Please see Chapter 8 for additional details). Accordingly, the socioeconomic analysis of Alternative 5 has been revised to capture the effects of these changes. The Alternative 5 analysis concludes that the retention of these services would support spending patterns similar to those of baseline conditions, as described in the document.

Commerical Operations—Elimination of Recreation Facilities

Concern 408: The NPS should not eliminate commercial recreation activities as they provide vital visitor experience that allow visitors to connect to the park and resources.

> *The Summary Guide is deceptive with alternative 5 (preferred) with the general statement "reduce commercial services" that really means eliminating rafting, horseback riding, ice skating and bicycle rentals in Yosemite Valley for visitors. These are important recreational activities that build respect and understanding of the river environment by children and families.*
>
> (Individual; Correspondence #87)
>
> *Eliminating the pools and the ice skating also are not reasonable. They are part of a fun family experience and have minimal impact on the environment. The same holds for the horseback riding and rafting in the park. These have been enjoyed for decades and are part of the park experience.*
>
> (Individual; Correspondence #1702)

I think a lot of preservation is going on in Yosemite but by closing down the above activities you are being detrimental to those visiting. I think people have become very aware of being careful of the environment in Yosemite and at home. We all want to preserve nature but who are we preserving it for if all the activities are taken away. I've been going to Yosemite for over 60 years and I have wonderful memories of ice skating at Curry Village, biking, camping, crossing the wonderful bridges,swimming visiting the art center, hiking to the falls, watching movies outside, listening the the rangers. A part of life is about "Making Happy Memories" and Yosemite has made me happy for many years.

(Individual; Correspondence #2648)

Response: Please see the response to Concern 405.

Concern 409: The NPS should not eliminate commercial recreational activities because it will concentrate visitor use in limited areas, resulting in crowding and impacts to the river and trails.

Eliminating commercial services in the valley forces people to recreate on the river or hike and instead of spreading visitation out. It consolidates recreation to the river and the hiking trails, defeating the purpose of the MRP, which is to reduce crowding and protect the river from degradation. Yosemite Valley is so much more than just a river, it is a place where millions come to see and do and enjoy. So much of Yosemite is already uncrowded and hikers looking for solitude can easily experience it. The draw of Yosemite Valley is its amazing scenery and much of its visitation only sees Yosemite Valley and goes home thinking they saw it all. Eliminating the ways that people can get off the road and out of their cars will only increase the number of visitors who feel that they "saw Yosemite", yet missed the Yosemite experience.

(Individual; Correspondence #95)

I don't believe elimination of these services including bike rental and all of the pools, serves the visitor community... Elimination of these services will only increase the crowds on the trails and at the river.

(Individual; Correspondence #866)

Visitors have enjoyed the horseback riding, bicycle rentals, skating rink and swimming pools. Without these activities the impact on the Merced river will actually increase, as that will become the main source of activities for families who do not hike the beautiful trails.

(Individual; Correspondence #1524)

Our objection to your preference is primarily the elimination of the bike and raft rentals and elimination of the pools. It seems very obvious to us that if you eliminate these activities you will be sending MORE people into the river and adversely impacting it.

(Individual; Correspondence #1956)

Response: In response to public comment, the NPS has re-considered the removal of recreation activities and many activities will remain in Alternative 5 (Preferred). NPS evaluated each public use facility (including commercial recreational activities) to determine whether the facility could feasibly be relocated outside of the river corridor. In the case of the commercial recreational activities that will remain, the majority (such as bicycle and raft rentals) could feasibly be relocated outside the corridor. Please see “Alternatives” (Chapter 8) for a complete discussion of activities retained under Alternative 5 (Preferred). In the alternatives where a large number of commercial activities are removed, there is also a reduction in segment user capacity such that the removal of those activities will not cause additional crowding at other sites. In many cases the number of people that participate in these activities are low enough (when compared to the other more popular activities like scenic driving, camping, scenery viewing) that the number of people who are re-directed to new activities would not create measurable changes in crowding levels on the river or on trails.

Concern 410: The NPS should retain commercial facilities because their continued presence is consistent with the intent of WSRA with regard to infrastructure and recreational activities and their presence does not impact ORVs.

> *In summary, our Board supports the public's right to access and enjoy their national park. We believe that the Merced River Plan extends beyond the historic intent of the Wild and Scenic Rivers Act and National Park values. The Act does not require removing any recreation activity or infrastructure that existed prior to the 1987 designation in support of these activities. To restrict recreational activity and remove infrastructure will affect visitor experience and ultimately impair our tourism economy.*
>
> (Individual; Correspondence #1984)
>
> *This is despite the fact that the Wild and Scenic Rivers Act states that "WSRA shall be administered to protect and enhance a river's ORVs. Insofar as possible, uses that are consistent with this and do not substantially interfere with public enjoyment and use of these values should not be limited" (page 2-3 of the Plan). The Plan offers no convincing evidence that bicycles, rafts, or horses are inconsistent with protecting and enhancing the Merced Rivers ORVs or substantially interfere with public enjoyment of these values. Therefore, these activities should not be limited.*
>
> (Individual; Correspondence #2249)
>
> *We also know that it was not the original intent of the WSRA to remove almost all recreation and infrastructure within the river corridor. ... We don't believe that the WSRA intended to take away something that was already there if it was not causing degradation. In Chapter 7, in the Facilities and Services chart of the EIS you show that the Curry Village Raft Rental, the Curry Village Ice Rink, the Curry Village stables, the Commercial Horseback Day Rides in Yosemite Valley, the Curry Village Bike Rental, and the Ahwahnee Swimming Pool, do not affect the River Values, and that there is no required action or mitigation measures. So you have no justification for removing them ..... Footnote 5, which suggests the removal of these things is a legal opinion that does not have value as a president, and it is not mandated. In other words we think you have taken the WSRA way too far.*
>
> (Individual; Correspondence #2325)

Response: The 2008 decision issued by the U.S. Court of Appeals for the Ninth Circuit concluded that NPS could not presume that facilities that existed in the river corridor before the river's 1987 designation as wild and scenic were protective of river values. The court directed that NPS analyze facilities in accordance with the Wild and Scenic Rivers Act and the 1982 Secretarial Guidelines that interpret the Act. The response to Concern 308 explains the process that NPS used to determine the range of facilities and services that could be retained in each alternative. This process includes assessing whether it is feasible to relocate major facilities, and if not, whether the facilities are necessary for public use or resource protection.

Concern 411: The NPS should retain commercial recreation facilities because they encourage children and young people to develop a love for the park that evolves into respect and protection for the park in later life.

> *Before deciding to remove all of the commercial services, you may wish to reconsider the services that provide fun activities for families. Without the pools, bikes, horses and ice skating, all the visitor activities that remain will only appeal to backpackers and rock climbers. ...Families will not visit without family activities, so the future of the parks will be in jeopardy without new supporters from the young generation.*
>
> (Individual; Correspondence #1312)
>
> *Also, we should be encouraging families to want to come to Yosemtie so that children from a very young age can gain an appreciation, respect and love for this park. In order for families to want to come you must offer activities that they love to take part in. What is the harm of having the pools, ice rink, and raft rentals?*
>
> (Individual; Correspondence #1497)

we do not support the efforts included in this plan to eliminate activities which are currently and have previously been enjoyed by the visiting public such as swimming in pools, rented bicycles to ride the valley floor, and horseback riding. Each of these activities encourages the public to love this spectacular place, to have those fond memories with their families, and to continue to support the protection of Yosemite.

(Individual; Correspondence #1672)

I think taking out all of the activities that the young people use is a great mistake. Many of us learned to love the park as children because of these activities. It is only when we are older and have traveled around the world do we really realize how rare and amazing is the beauty of our National Parks.

(Individual; Correspondence #1676)

Response: The NPS final Alternative 5 (Preferred) proposes to retain the majority of the commercial recreational activities in Yosemite Valley, such as swimming pools, raft rentals and the ice skating rink. However, the infrastructure associated with some of these recreational activities/services will be relocated outside of the river corridor and in some cases, the area will be redeveloped for different use. Commercial horseback day-rides will still be discontinued in Yosemite Valley but will be expanded in Wawona.

Concern 412: The NPS should retain commercial recreation facilities because they enable family friendly activities and are appropriate within the National Park setting.

I think it is a mistake to eliminate horse back riding, (day) bicycle rentals, rafting and commercial cafes from the park. These are all family oriented activities and there should be a place for them within the park

(Individual; Correspondence #945)

I am opposed to removing some of the man-made outdoor recreational activities within Yosemite, namely the ice rink, swimming pools, tennis court and others listed.

(Individual; Correspondence #1141)

As an adult, after or during a day of hiking, strolling meadows, sight-seeing, skiing, eating, etc., I can sit down and relax. An active younger child however, often can not, and needs an outlet. An older child is easily bored, and they tell you so repeatedly. As a parents, we make travel decisions based on keeping children happy, and in turn, ourselves happy.

Also, the bike rentals and the raft rentals and horseback riding significantly add to our enjoyment of our Yosemite trip for the family. I don't know why you would want to eliminate those things that are more for families. Children don't do much rock climbing but they do like to ride bikes and horses. By eliminating these activities you seem to be making the park more of an adult destination for hikers and climbers and not so much for families with kids.

(Individual; Correspondence #1430)

Response: Please see response to Concern 411.

Concern 413: The NPS should retain commercial recreation facilities because these resources make the park more accessible for children, the elderly, and disabled visitors.

Please reconsider the removal of the commercial services in the park. Swimming pools, bicycles, horseback riding and ice skating add wonderful alternate recreational activities for guests to enjoy the park while creating a relatively small impact of the environment. Not everyone can walk or hike great distances, and though the buses and shuttles are a terrific way to enjoy the park, they are limited.

(Individual; Correspondence #537)

Removal of the Consession Services as stated in ALT's #2-6 will have a negative effect on the Disabled Community. Visiting such a wonderfull place is already a challenge, losing this services simply makes an extened trip non realistic for many.

(Individual; Correspondence #954)

Providing visitors with recreational opportunities is critical to better experiences for the guests of Yosemite Park. We [Madera County Board of Supervisors] believe that visitors are guests and park management should be cognizant of the needs of these guests. To deprive guests of the ability to have activities that promote exercise, that enable the disabled, elderly or young to access scenic areas of the Valley, and that provide river experiences for all, is unacceptable.

(Individual; Correspondence #1984)

Response: Please see response to Concern 411.

Concern 414: The NPS should retain commercial recreation facilities because these resources make the park more accessible for visitors of limited socioeconomic means.

The bike rental, raft rentals, swimming pools, housekeeping camp, bridges, etc. provide middle class Americans a chance to enjoy themselves in the incredible setting of Yosemite Valley. The impact is minimal and the benefit is maximum for visitors.

(Individual; Correspondence #779)

We are saddened that all of the new alternatives will remove horse, bike, and raft rentals in the valley. While we understand the negative impact the stable operation has on the environment, and we will dearly miss riding the horses, it is not clear why bike and raft rentals are being eliminated. Bikes and rafts will apparently still be allowed, if visitors bring their own equipment. This policy clearly favors those higher income visitors who can afford to purchase/transport their own equipment versus those that can only afford an occasional rental.

(Individual; Correspondence #2010)

The purpose of the National Parks was for everyone to be able to recreate within them without discrimination. Understandably, it's in the best interest to protect the park, but why not look into some other alternatives that don't inhibit its use. You're proposing that only people who own horses can ride horses in the valley, only people who own rafts or bikes with the means to get them into the valley can do so. This is just another form of class discrimination; most people can afford spending $100 for the day to rent four bikes for their family...but purchasing four bikes, a bike rack, and any extras needed would be well upwards of $500, a cost that isn't feasible for many.

(Individual; Correspondence #2480)

Living and working in Yosemite National Park for over 25 years, I've talked with hundreds of guests on this subject and base my position on their responses, logic, and common sense, with the following changes necessary: More affordable pricing, so the majority of the U.S. taxpayers, who support the park, can visit and enjoy Yosemite without being priced out. This has happened to many longtime guests since the Flood of 1997 when a number of lodging units and campsites were taken out, with fewer units, and, much higher prices.

(Individual; Correspondence #2603)

I do Understand that this park needs to be managed properly in order to maintain it's beauty and existence. However, my concern is that the management proposal, stands to eventually eliminate the public's use of this park in an affordable and overnight useage.

(Individual; Correspondence #2613)

In its 'Call to Action", NPS has indicated its intended outreach to underserved populations. The elimination of recreation activities is in direct contradiction to that effort and there has been no analysis of the impact on Yosemite's current visitors or the target visitor over the years to come. ... From our

experience with NatureBridge, we know that participants from underserved populations who are in their programs have greater reliance on equipment that is either rented or otherwise provided by NatureBridge. We suspect it is the same case for the other commercial recreation services that are provided by DNC and the elimination of these commercial recreation services will disproportionately impact disadvantaged populations.

(Business; Correspondence #2819)

Response: Please see response to Concern 411.

Concern 415: The NPS should remove commercial recreation and resort-style facilities because they are inappropriate within a National Park setting.

The rest of the plan we very much support: remove commercial services, horseback riding, bike rental and swimming. Yosemite valley is some of the most beautiful and luxuriant hiking in California but the valley is not a resort. Let people go hiking. They don't need swimming pools, horses and bikes.

(Individual; Correspondence #593)

I strongly support removal of inappropriate tourist recreational facilities in Yosemite Valley, such as swimming pools, ice rinks, and various man-made structures that are not principally oriented toward a low-impact and visually unobtrusive enjoyment of the unique natural setting.

(Individual; Correspondence #1334)

I particularly like the focus on returning Yosemite Valley to more of its natural wonder. Some of the amenities are interesting, but I don't think are appropriate in Yosemite, given the limits on space. For example, swimming pools belong in a Motel 6 not in the Valley.

(Individual; Correspondence #3267)

To read and hear some of the public outrage over supposed recreational "restrictions" in the preferred alternative (though it seems the most vocal admit they are foggy on plan details), one would think that the only way for people to recreate in Yosemite Valley is to rent a bicycle, pay by the hour or day to ride a horse or raft, or pay admission to enter a swimming pool. But this is not true. Park visitors can picnic, swim or wade or play by or in the Merced River, hike, or bring their own rafts, bicycles, or even horses to use in Yosemite Valley'for free. It seems that these forms of no-cost recreation would be appealing for the majority of Americans if they understood the actual situation in Yosemite Valley. I don't understand why some claim that eliminating concession services for these forms of recreation would make the park less "tourist-friendly."

(Individual; Correspondence #3325)

Response: There are no universal criteria for what is “necessary” that can be applied to all of the diverse areas that comprise the National Wild and Scenic River System. Rather, what is necessary must be determined for each wild and scenic river area with reference to the particular resource and other concerns specific to that area. All commercial services currently offered within Yosemite have met the test of being “necessary and appropriate” according to NPS policy.

The NPS evaluated all existing and proposed public use facilities within the river corridor using a rigorous, three-step process that determined whether it would be: (1) feasible to relocate the facility outside the river corridor; (2) if the facility would be infeasible to relocate, whether it is necessary for public use and/or resource protection; and (3) if the facility is both infeasible to relocate and necessary for public use or resource protection, whether it could be maintained without adverse impacts to river values. Because the Merced Wild and Scenic River is located in Yosemite National Park, determinations of the kinds of facilities that are necessary for public use were informed by the National Park Service’s **Management Policies 2006** and by Yosemite’s 1980 **General Management Plan (GMP)**, as well as by WSRA. The Management Policies

recognize that many facilities may need to be provided inside parks when travel distance to similar facilities outside the park is too great to permit reasonable use or when having to leave the park would substantially detract from the quality of the visitor experience. Yosemite's GMP serves as "the basic foundation for decision-making" within the park and identifies "the kinds and levels of management activities, visitor use, and development that are appropriate for maintaining the desired conditions" of resources and "that will best fulfill the purpose of the park." The MRP exhibits a high degree of consistency with the facility and development decisions of the 1980 Yosemite GMP. "Development of Lands and Facilities" (Chapter 7), Table 7-2, shows those facilities that were proposed to be removed in the GMP that are retained in the MRP and the reason for these decisions. In most cases, facilities are retained because there are no suitable locations outside the river corridor and they are necessary to support visitor use levels identified in Alternative 5 (Preferred).

Concern 416: The NPS should consider alternatives to the removal of commercial recreation facilities, such as use restriction or relocation of facilities outside of the river corridor and Yosemite Valley.

> *Significant reduction or relocation of commercial services and lodging and limits on private vehicular use will both likely be necessary if anyone is to enjoy the Yosemite Valley in years to come. Campsites, lodging, parking, and commercial services will need to be located outside the valley, and visitors may have to access the valley through public transit only.*
>
> (Individual; Correspondence #965)
>
> *For the services that are no longer retained, the conclusion is generally that the service is "not a vital visitor service." Once a service was deemed not "vital", the step to evaluate relocation was termed "NA. This service will be eliminated," so no evaluation was conducted to determine the feasibility of continuing the operation outside the river corridor. ... We have many questions and issues associated with this analysis. ... Under this [Concessions Management Improvement Act] standard, all of these activities and services currently in Yosemite have been authorized by NPS and the same or similar services exist in many other national parks. For instance, the Grand Canyon added a bicycle rental operation in the last two years, so our understanding would be that this service passes a recent standard of "appropriate and necessary" that has long been employed for commercial services. The term "vital" is not a requirement or standard with which we are familiar, so we have no basis to understand how this is used in the context of this plan.*
>
> (Business; Correspondence #2818)
>
> *It would be well to find a way for the ice rink and bicycle rentals. Perhaps a seasonal, portable ice rink erected on a little used parking lot during the winter would work. Is there a way to rent bicycles that takes less effort to operate and less space on the Valley floor?*
>
> (Individual; Correspondence #3267)

Response: NPS evaluated all existing and proposed public use facilities (including recreational facilities such as bike and raft rentals) using a three step process that determined whether it was: (1) feasible to relocate the facility outside the corridor, (2) if not feasible, then whether the facility was necessary for public use or resource protection, and (3) if infeasible to relocate and necessary, whether the facility had any adverse effects on river values. In the case of commercial recreation facilities, both relocation and use restrictions were considered in the FEIS. Please see response to Concern 411.

Concern 417: The NPS should retain facilities proposed for removal because their removal will result in minimal environmental benefit.

> *I believe the environmental benefit of removing the identified commercial services would be negligible. The natural ambience of Yosemite Valley is not threatened by the rental of bikes, horses, or the existence*

of swimming pools. Such amenities are positive additions to the park, and extremely limited in their adverse impact. All National Parks must have a degree of development in order to be used by citizens, who incidentally are the same ones whose taxes are supporting the parks.

(Individual; Correspondence #928)

These recreational opportunities [Curry Village Raft Rental, Curry Village Ice Rink, Commercial Horseback Day Rides in Yosemite Valley, Curry Village Bike Rental, Ahwahnee Swimming Pool, Yosemite Lodge Pool and Snack Stand, Yosemite Lodge Bike Stand] are traditional, historic and family-based activities that contribute greatly to the Yosemite experience. Our [Madera County] Board adamantly opposes the elimination of any of these elements of the MRP. We believe that no harm is done to the Merced River by continuing these uses, nor are their elimination required by the Wild and Scenic Rivers Act.

(Individual; Correspondence #1984)

[A modified Alternative 3 would] retain numerous minor facilities that are not causing any measurable ecological impact or conflict with the WSRA. Specifically, the bike rental operation at Curry Village is not taking up any ecologically important site nor would removing it result in restoration to occur to restore the site to provide wildlife with needed habitat. Likewise, the Yosemite Lodge bike stand, the Ahwahnee pool and the Yosemite Lodge pool are all "facilities" that are either in the shadow of the main facility or are actually located in between buildings. It is inconsistent with the intent of the WSRA to claim that somehow the removal of these minor facilities would protect and restore the river corridor when the major structures and human activities tied to those structures would continue to be retained. ... It would be far more consistent with the WSRA to remove the intruding facilities identified in this Modified Alternative 3 proposal such as the southernmost Yosemite Lodge building, various structures at Curry Village, the majority of Housekeeping Camp structures, and hopefully the two planned concessioner employee housing dorms at Yosemite Lodge.

(Individual; Correspondence #2212)

The NPS should retain visitor services because their removal provides no environmental benefit, is not required by WSRA and the public greatly values these services. According to the Merced River baseline conditions report, the river is in excellent condition--better than when it was designated. The studies found that natural resources and ORVs are not degraded as suggested in footnote 5. If the science shows that current conditions are within the standard of acceptability, it is unclear to us why so many visitor services are being eliminated or reduced, or why there is such a concerted effort to move so many facilities out of the river corridor.... Visitors have been skating on an ice rink in Curry Village since 1928. No negative impacts were identified by NPS from this activity and it has no impact on summer days when visitation is highest. The ice rink is a valued and unique traditional experience for Yosemite's winter visitors.

(Business; Correspondence #2818)

Response: Please see response to Concern 411. In addition, "River Values and Their Management" (Chapter 5) studied each river value (including biological river values) and identified areas where facilities and public use activities are resulting in localized adverse effects to these values. "Development of Lands and Facilities" (Chapter 7), Table 7-1 further highlights the specific, localized concerns related to each existing or proposed public use facility. In areas where facilities or public uses affect river values, "Alternatives" (Chapter 8) proposes actions (common to all alternatives) that would ensure river values are protected. In some cases, this means that facilities or public uses will be removed or restricted within the corridor. In others, actions will be taken to relocate facilities, divert users, or restore impacted areas. "Affected Environment and Environmental Consequences" (Chapter 9) analyzes the direct and indirect environmental impacts that would result from implementation of the actions outlined in each of the alternatives in Chapter 8.

Concern 418: The NPS should retain visitor facilities because elimination of these decentralized opportunities will increase stress on remaining facilities and increase traffic congestion.

Contrarily [the removal of commercial recreation activities] would necessitate more time in ones car on the already crowded roads or the equally crowded shuttle.

(Individual; Correspondence #1621)

Keeping user capacity number at current levels and addressing traffic flow/congestion are key components to deciding if relocation of recreational services is prudent. It would seem that centralizing these services would add to congestion and traffic problems. The current locations are decentalized and offer the best opportunity for solving traffic congestion.

(Individual; Correspondence #2184)

Curry Village is absolutely wonderful as it is now. It has a character and charm all its own and I like every part of it. I do not want to see the bike rentals, horse stables, tennis courts, swimming pools, retail shops, snack stands etc. closed down. This would be a detrimental change that would cause added congestion by forcing people who stay at the village to travel to other park sites for recreation and shopping. For some visitors, especially those traveling from long distances, it is a benefit to have a variety of activities available at Curry Village

(Individual; Correspondence #2773)

Because each of these plans reduces commercial venues, campsites, parking, etc. I think the result would increase park congestion since there will be less alternative activities available to visitors. Thus the most popular trails, sites and destinations will be even more crowded. I feel it is vital to retain these activities so visitors to the park will spread out to various park destinations.

(Individual; Correspondence #2773)

Crowding and congestion create the perception of over commercialization. The Preferred Alternative will intensify this perception because the actions identified will lead to longer lines and more crowding for the services that remain. ... Overall, the elimination of retail services identified in the MRP will not reduce the perception of commercialism in Yosemite. The actual buildings that these services operate from will remain, meaning that there is no restoration to natural conditions of the development footprint; however, the elimination of these services could result in measurable impact to the visitor experience and increase compression on other facilities.

(Business; Correspondence #2818)

Response: Please see response to Concern 411.

Concern 419: The NPS should improve concession management operations to lessen resource impacts rather than eliminate those commercial recreation services.

Eliminating commercial recreational services in Yosemite Valley is wrong-headed and counter-productive if the intent is to introduce nature and the magnificence of Yosemite NP to visitors. The fact that elimination of these services is recommended indicates to me that they haven't been properly managed with respect to impacts whether visual, noise, trail damage etc.. Concession management should be reviewed and revised before elimination. ... Manage the concessionaires to minimize impacts but maximize the range of recreational experiences available.

(Town or City Government; Correspondence #301)

I object to any NPS conclusion which justifies elimination of visitor services such as commercial rafting, bicycle rental, commercial stock day rides and the ice rink removal. Each NPS concern can be addressed to incorporate little or no impact on the river by management of the human impact without a strong social injustice component that negatively impacts the less affluent visitor at a disproportionate level.

(Individual; Correspondence #3498)

Response: Please see response to Concern 411. Commercial recreational activities were not proposed for removal in the DEIS because of poorly managed operations by the concessioner. Under existing concession contracts, the National Park Service maintains through contract with concessioners the right to suspend or terminate the concessions contract in whole or in part when necessary for the purpose of enhancing or protecting area resources or visitor enjoyment or safety.

Rather, an evaluation of these facilities showed that they could be feasibly relocated outside the river corridor, their location was needed for different land use, or there were conflicts with river values that would be addressed through the elimination of the services, such as hiker/stock conflicts on busy Yosemite Valley trail segments. "Development of Lands and Facilities" (Chapter 7), Table 7-1: Evaluation of Facilities within the River Corridor by River Segment specifically addresses localized impacts to river values caused by facilities or activities. Where any of these facilities are negatively affecting river values, "Alternatives" (Chapter 8) proposes actions common to all alternatives—such as relocating facilities or redirecting visitor use—that will protect these values.

Concern 420: The NPS should retain concessioner recreational services to introduce nature to visitors of all outdoor comfort levels.

> *Visitors need to experience nature, the magnificent Sierra, clear air at whatever level they are capable of. Gazing up at the awesome cliffs while floating on you back in the hotel swimming pool, seeing wildlife while rolling along on a bicycle, experiencing the cold water splashing on the river raft are amenities that lead to an appreciation of nature just as climbing a peak or backpacking on the Pacific Crest Trail does for the super-fit.*
>
> (Town or City Government; Correspondence #301)
>
> *We oppose the removal of bike rentals, swimming pools, horseback riding and other recreational activities. The park is here for all of us, not just hikers, climbers and naturalists.*
>
> (Individual; Correspondence #2530)
>
> *Whatever Alternative is decided on, hopefully it will maintain many of the commercial services that really do allow one to enjoy the nature experience.*
>
> (Individual; Correspondence #2650)

Response: Please see response to Concern 411.

Concern 421: The NPS should retain commercial recreation facilities in order to balance preservation and visitor use within the Park.

> *As I reviewed the various options for changing Yosemite, I was disheartened to see that with the exception of Option 1 - No Change, each option would significantly decrease the enjoyment for the average family. By eliminating the commercial services within the river corridor, we would be taking away viable alternatives that help many people engage with their national park.*
>
> *I disagree that removing the raft rental, the bike rental stands, the horseback riding, the swimming pools, the ice skating rink, and the Housekeeping Camp Store would improve the Yosemite experience. I believe that as we make changes to preserve Yosemite for future generations, we must move cautiously to balance preserving the natural beauty of Yosemite, with the needs and enjoyment of those who visit.*
>
> (Individual; Correspondence #2631)

Response: Please see response to Concern 411.

Concern 422: The NPS should not limit visitor access by eliminating commercial facilities that do not degrade the Merced River.

NPS is also proposing to close the Curry Village ice skating rink, bike rental facilities, snack stands, swimming pools, tennis courts, retail stores and horse stables and stock use. These facilities are not located in the Merced River, do not impeded its flow, and many existed and historically served Yosemite visitors for decades prior to Congress passing the Act. It defies logic that NPS is proposing to close these facilities not because they degrade the Merced River, but instead because in NPS's eyes, these longstanding facilities do not benefit the River. What about the benefits that the American public will lose under NPS's proposal? NPS is also proposing to eliminate commercial rafting on the River. Like the existing facilities, commericial rafting is a service that was offered before the Merced River's designation under the Act. (FROM SAME LETTER AS COMMENT #320474)

(Federal Government; Correspondence #2702)

Keep the swimming pools, the bike rentals, the tennis courts and ice-skating rink. They do not in any way degrade the river.

(Individual; Correspondence #3700)

The NPS should retain visitor services because their removal provides no environmental benefit, is not required by WSRA and the public greatly values these services. According to the Merced River baseline conditions report, the river is in excellent condition--better than when it was designated. The studies found that natural resources and ORVs are not degraded as suggested in footnote 5. If the science shows that current conditions are within the standard of acceptability, it is unclear to us why so many visitor services are being eliminated or reduced, or why there is such a concerted effort to move so many facilities out of the river corridor.... Visitors have been skating on an ice rink in Curry Village since 1928. No negative impacts were identified by NPS from this activity and it has no impact on summer days when visitation is highest. The ice rink is a valued and unique traditional experience for Yosemite's winter visitors.

(Business; Correspondence #2818)

Response: Please see responses to Concerns 411 and 419. Commercial recreational activities were not proposed for removal in the DEIS because they degrade river values. Rather, each of these facilities was evaluated to determine whether: (1) it could feasibly be relocated outside the river corridor, (2) if it could not be relocated, whether it is necessary for public use or resource protection, and (3) if infeasible to relocate and necessary, whether it can be maintained without adverse effects to river values. Some public use facilities are proposed for removal because they do not satisfy these criteria. "Development of Lands and Facilities" (Chapter 7), Table 7-1: Evaluation of Facilities within the River Corridor by River Segment specifically addresses localized impacts to river values caused by facilities or activities. Where any of these facilities are negatively affecting river values, "Alternatives" (Chapter 8) proposes actions common to all alternatives—such as relocating facilities or redirecting visitor use—that will protect these values. At a minimum, each of these facilities is addressed so that protective measures are implemented.

Concern 423: The NPS should remove the tennis courts at the Ahwahnee and Wawona Hotels.

[I like the r]emoval of Ahwahnee tennis court--it is in such a state of disrepair and just doesn't make sense.

(Individual; Correspondence #215)

Both the tennis courts at the Ahwahnee and the Wawona Hotel should be removed.

(Individual; Correspondence #2460)

Response: The Ahwahnee tennis courts are obsolete and no longer used by visitors. They will be removed from the California black oak woodlands under all alternatives because they are no longer necessary. The

Wawona tennis courts, however, are a contributing feature of the National Historic Landmark Wawona Hotel complex (ORV 14) and do not have any localized adverse effects on river values. They will be retained under Alternative 5 (Preferred).

Concern 424: The NPS should remove both the NPS and Concessioner facilities from Yosemite Valley, and also prohibit private rafting because of impacts to biological resources.

> *I strongly support discontinuing the concession operated horseback rides and river rafting. I suggest the NPS go one step farther, though, and remove both stables in Yosemite Valley, and terminate both commercial and private rafting because of the significant impacts both horses and rafting have on the river and associated ecosystems.*
>
> (Individual; Correspondence #2273)

Response: The NPS final Alternative 5 (Preferred) proposes to eliminate the commercial horseback day-rides from Yosemite Valley because they have a very low rate of usage, the land allocation within the corridor for the stables operation is disproportionately large given the declining number of users, and because commercial day rides contribute to hiker/stock conflicts on Valley trails. However, the NPS administrative stables facility is outside the river corridor and the use of administrative stock animals in the river corridor does not result in the same conflicts with recreational users on busy Yosemite Valley trail segments. "River Values and their Management" (Chapter 5) identifies localized impacts to river values resulting from facilities and activities. Stock trails in close proximity to the river have localized water quality and riparian area impacts and will be addressed in all alternatives (See "Alternatives" [Chapter 8], Actions Common to Alternatives 2–6). For boating, there is no evidence that one group of boaters (whether commercial or private) does significantly more damage to river banks than the other. Also, as boating is a part of the Recreational ORV in Yosemite Valley, some level of boating use is protected with this ORV. Rather that eliminate this kind of use, the NPS explored a range of amounts of use for boating that would be protective of all river values across the alternatives. (See Chapter 8 for specifics by alternative).

Concern 425: The NPS should align decisions regarding services and activities with previous park planning documents like the General Management Plan and the Concession Services Plan.

> *While the NPS has invested considerable time and money to conduct extensive research to study some visitor services and activities, there is much more that should be known before activities are eliminated. Further, we believe changes to facilities and services are called for in the MRP where the research does not support the action. We understand that the data collected to inform a plan is not the only information considered when making a management decision; however, we urge the NPS to make science-based decisions where possible, rather than decisions that appear to be based on the possible avoidance of litigation. We believe the NPS has a solid argument in their conclusions to support the retention of the services/facilities mentioned in footnote 5, and you have advocated for these services in numerous other plans, including the 1980 General Management Plan (GMP), the 1992 Concession Services Plan (CSP), the 2000 Merced River Comprehensive Management Plan (CMP) and the 2005 Merced River Revised Plan (RP). We urge the NPS to rely on their research, the WSRA, concession law and policy and historic visitor experiences to make management decisions related to visitor services, rather than using a narrow view of the Ninth Circuit Court's opinion interpreted in footnote 5 as a predetermination of outcome. ... GMP, CSP, CMP, RP, Superintendent's Compendium and current concessions contract all allow for bike rentals. The MRP notes that it is a unique way to recreate in Yosemite Valley. Because of its precedence as being a necessary and appropriate service in all past YNP planning documents, we question what has changed that resulted in such a dramatic alteration of the NPS position on this recreation activity.*
>
> (Business; Correspondence #2818)

Response: Please see response to Concern 415.

Concern 426: The NPS should retain commercial recreation opportunities because concessioner involvement contributes to visitor safety and resource protection, whereas increased private use may increase the threat of introduction of invasive species.

> *We especially disagree with the reductions in opportunities for concessioners to assist in helping visitors enjoy visits to the Merced corridor. We can find no evidence that concessioner rentals of bikes and water devices contributes to any resource damages - and in fact, concessioner involvement in these operations can be key to visitor safety and resource protection strategies. The plan does not address the increased threat posed by increases in visitor-provided recreational devices – including the potential introduction of exotic and invasive species. Nor does it address the impact of reduced franchise fee receipts when NPS is actively pursuing a new financial model that supplements general fund appropriations at a much higher level than today.*
>
> (Unaffiliated Individual; Correspondence #3529)

Response: Please see the response to Concern 409.

Commercial Operations—Hotels/lodging

Concern 427: The NPS should retain Housekeeping Camp in its existing configuration because it provides an affordable lodging option to visitors.

> *The proposals will leave Yosemite out of reach of hard-working Americans of modest means. Leave the American people in the park, and do not destroy the unique and well-loved Housekeeping Camp.*
>
> (Individual; Correspondence #65)
>
> *I have been going to Housekeeping Camp for nearly 50 years. I went there with my parents and I now take my own children there. We spend the day at the beach or hiking. We make friends with people in neighboring tent cabins--people of all different socioeconomic and ethnic groups.*
>
> (Individual; Correspondence #65)
>
> *I think it would be a great shame to eliminate affordable accommodations such as the housekeeping camp from the Valley while retaining the Awahnee for those with money. This will turn away older families who may not be able to camp and make Yosemite a far more class-based experience.*
>
> (Individual; Correspondence #630)

Response: Alternatives 2-6 explore a range of actions at Housekeeping Camp. Under Alternative 5 (preferred) Housekeeping Camp will be largely retained in accordance with the 1980 GMP (limited 266 units), but further reduced to 232 units. Units that are within the ordinary high water mark of the river (2-3 year floodplain) will be eliminated in order to improve the hydrological function of the river.

Concern 428: The NPS should not eliminate affordable lodging at Curry Village because it provides park access for the elderly or economically disadvantaged visitors.

> *My parents who are in their 80's still love vistiing Yosemite, but are not able to camp in the way that we did when they were younger, and to that Camp Curry has provided my parents an avenue to continue to enjoy the park. I understand the Awahnee will remain, but this is an extremely expensive and option, with very limited availability.*
>
> (Individual; Correspondence #116)
>
> *Though most of the cabins at Curry are a bit ramshackle (I had to find a piece of wood to prop up one end of the bed last time we were there) they still provide a warm space, close to everything and at a price within our range, though at the top end of it. We would hate to see this alternative disappear as well.*
>
> (Individual; Correspondence #249)

Notably, the proposal to replace the low cost tent cabins in Boystown with hard sided structures will have a devastating effect on critical youth education programs in Yosemite Valley.

(Individual; Correspondence #2918)

While the Merced River Plan offers vast opportunities for our students to participate in restoration efforts and engage in hands-on stewardship, the elimination of low-cost lodging in Yosemite Valley (as proposed under all alternatives) would be detrimental to our operations with the potential to severely curtail the number of students we serve. The preferred alternative envisions higher priced, upscale multi-plex lodging that will allow for greater year-round use. Without an alternate low-cost lodging option, this action would dramatically shrink our teaching season, push out our students who occupy tent cabin facilities in the shoulder seasons, and price out many of the 13,000 school children who attend our field science programs each year, many of whom attend public schools and receive scholarship funding.

(Individual; Correspondence #3376)

Response: In 1987, when the Merced River was designated as Wild and Scenic, Curry Village included 426 tent cabins, 103 cabins with-bath, 80 cabins without-bath, and 18 units in Stoneman Cottage; 627 units in total. Curry Village now includes 424 tent cabins, 47 cabins with-bath, 14 cabins without-bath, and 18 units in Stoneman Cottage; 503 units in total. The decline in the overall number of units is a consequence of a 2008 emergency closure of, and removal of all hard-sided cabins and tent cabins located within, the Curry Village rock fall hazard zone. A significant number of tent cabins and cabins without-bath were used for concessions employee housing, which has been disbursed in the interim to Huff House and Boys Town areas of Curry Village. (These numbers are not included in the numbers provided above, since they are temporary quarters established through the 2009 Settlement Agreement.)

Under the preferred alternative, the number of tent cabins will be reduced to 351 and the number of cabins with-bath increased to 99, while the number of cabins without-bath and units in Stoneman Cottage would remain equal. The overall number of units will decrease by 21 lodging units to 482. In response to public comments, 50 tent cabins and 14 cabins without-bath would remain in place in the historic configuration that is known as Boys Town, and would remain available for outdoor education programs during the school year. The NPS has reduced the proposed number of new hard-sided cabins with-bath from 98 to 52.

Although the overall number of lodging units is less than what existed in the past, the supply of lodging available to park visitors will actually increase because all of Curry Village tent and hard-sided cabins will be reserved for guest lodging. In the past, the 103 cabins without-bath as well as dozens of tent cabins were occupied by concessions employees.

Concern 429: The NPS should not eliminate any overnight lodging options.

I hope that in the interest of expanding lower cost options such as tent cabins and campsites, there won't be any reduction in Lodge accomodations.

(Individual; Correspondence #68)

Maintain camping, lodge, and hotel facilities by reservation so families can discover and enjoy the Park.

(Individual; Correspondence #246)

Response: Under Alternative 5 (preferred), the number of lodging units remains essentially the same as currently exists. Lodging units removed from the floodplain in Housekeeping Camp and rock fall hazard zone at Curry Village are replaced by the construction of 52 hard-sided units in Boys Town. The total lodging in the corridor under Alternative 5 (Preferred) increases from 1,160 units to 1,197 units.

Concern 430: The NPS should not allow Yosemite Valley lodging facilities to host conferences or special events or, at a minimum, should limit events during the peak season.

> *STOP renting lodging etc to people for business conferences. The lodging should be available to the public who wish to come and enjoy the park.*
>
> (Individual; Correspondence #1760)
>
> *Eliminate DNC's ability to use the Ahwahnee Hotel and Yosemite Lodge as a conference center and location for hosting special events, at least those clearly unrelated to Yosemite National Park.*
>
> (Individual; Correspondence #3325)

Response: The recommendation to not allow conferences at lodging facilities or limit them to during peak season is a level of detail not addressed in this plan. However, the existing primary concessions contract (executed in 1993) stipulates that the Concessioner shall limit convention and group meeting use of its facilities to the off-season period(s) and then only fill accommodations which would otherwise be vacant. Facilities may not be set aside for exclusive use by special groups if they would interfere with the general public's use and enjoyment of the area or facility. Furthermore, special events sponsored by the Concessioner will be phased out and private functions held in Concessioner facilities will be reduced. All requests for special events will be submitted to the Superintendent for review and approval/disapproval. Where occupancies are low, the Concessioner is encouraged to schedule special events which relate closely to park themes.

Concern 431: The NPS should improve existing lodging facilities in order to improve visitor experiences.

> *Your facilities, particularly the lodge facilities, are poorly maintained and an embarrassment to the country and the park system. They should be replaced gradually with new facilities, not reduced or removed. Rustic is nice, but unchanged for decades is poor management of the countries resources and a poor presentation to the worlds visitors that should be enjoying the facilities as well as the park's beauty. Your charges for the use of these facilities is exorbitant relative to the sub motel 6 presentation and maintenance.*
>
> (Individual; Correspondence #1702)
>
> *We have been visiting Yosemite every year since 1982. The scenery is magnificent, but the room accomodations,high price, quality and availability of food, and campground toilet and washroom facilities are sub par. The Curry village tent camps, housekeeping units and parking facilities are an abomination. Building more hard sided cabins with central toilets/showers and building food courts with a variety of outside food vendors would go a long way to eliminate visitors from trying to cook outside tents, creating a rodent problem.*
>
> (Individual; Correspondence #2103)

Response: Upgrades and improvements to existing facilities can occur without completion of a Wild and Scenic River plan; however, litigation has caused a level of uncertainty and insecurity in park investment strategies over recent decades. It is hoped that completion of the river plan will allow the NPS to commence with long-term improvements and to upgrade facilities in the near future.

Concern 432: The NPS should construct additional units in existing lodging facilities.

> *In fact, I'd love to see MORE Housekeeping units across the river, inwhat used to bethe old lower camp site near the amphitheatre.*
>
> (Individual; Correspondence #2288)

YOSEMITE LODGE:

Construct 1 new 3-story lodging structures with a total of 110 units. Again, why is the only suggestion in any alternative for constructing 4 new 3-story units at Yosemite Lodge instead of something less grandiose? Adding one structure will slightly increase the total number of available units at Curry Village and Yosemite Lodge from the current 645 total units to 710, permitting Delaware North Company a modest increase in the number of units without degrading the visitor experience.

(Individual; Correspondence #2316)

please consider adding a larger number of units in Yosemite Lodge. There is a large demand for this type of accommodation, and the proposal to increase this number to 440 units as specified in Alternative 6 would make it much easier to obtain a reservation at the Lodge.

(Individual; Correspondence #2463)

... Alternative 6 includes 440 units at Yosemite Lodge, an increase of 195 from the existing count and 55 units below the pre-flood room inventory of 495. We believe that the final plan, at a minimum, should incorporate elements of Alternative 6 and add back units at Yosemite Lodge to maintain the current room inventory for Yosemite Valley. ... If the final plan left the MRP number for Curry Village at 453, an increase of 84 rooms at Yosemite Lodge would maintain the current room inventory in Yosemite Valley. Rooms at Yosemite Lodge can be built to be environmentally friendly; the location does not have the historic sensitivity of Curry Village and would serve the public by allowing visitation growth in the shoulder season as envisioned in the MRP and the GMP

(Business; Correspondence #2818)

Response: The park currently has four lodging facilities. Two of the park lodges, the Ahwahnee and Wawona Hotels, are National Historic Landmarks. It would be very difficult to add buildings or to increase the number of guest rooms without compromising the historic integrity of these two historic hotels.

Alternative 6 proposes almost 200 additional units at the Yosemite Lodge. However, much of the lodge was originally constructed in the 100-year flood plain, and the lodge extent was reduced after the 1997 flood. New buildings would have to be constructed outside the flood plain. In order to do so, the size and height of buildings increases to three stories in Alternative 6.

The Merced River Plan and FEIS proposes an increase of 52 permanent units to replace 56 hard-sided lodging units that were lost in the 2008 rock fall incident. The number of tent cabins has fluctuated over time since Curry Village was established, with a high point of 467 in 2010, but will now be stabilized at 351.

Concern 433: The NPS should relocate lodging outside the river corridor or the park.

Camping is the best way for folks, especially those unfamiliar with nature, to experience Yosemite. Unfortunately camping has enormous impact on ecosystems, especially in sensitive riparian corridors. Expanded camping development will lead to more social trails, erosion, reduced water quality, reduced wildlife habitat, invasive plant species encroachment. I believe camping should be discouraged in riparian areas, and certainly not expanded. Instead I propose improving lodging near the park with concomitant parking OUTSIDE of the park. Shuttles could service these lodges. This would reduce congestion, improve air quality, improve the visitor experience, and perhaps even improve the economy of communities outside of the park.

(Individual; Correspondence #1479)

Housekeeping Camp, however, is a historic camp facility that lies right in the ecological bend of the river in an area where many units now lie within 150' of the water. In Alternative 5 the Park only proposes to remove units within 100' of the water. That violates the WSRA because it is totally feasible to remove units to at least within 150' of the water and still provide the recreational camp use of Housekeeping Camp. For any final selected alternative to allow campsite units to be located closer than 150' of the water will violate the clear intent of the WSRA because such units are NOT necessary in those locations.

It is feasible to remove all of Housekeeping Camp, and the lodging/camping provided can either be replaced outside of the Valley, outside of the Park, or simply not replaced.

(Individual; Correspondence #2210)

Almost the entire Yosemite Lodge facility is within the river corridor, and past plans by the Park Service spelled out the reasons why it was necessary to consider removing some of the lodge units closest to the river. WHAT IS IMPORTANT FOR THIS DISCUSSION IS TO RECOGNIZE THAT THE PARK SERVICE IN PAST PLANNING ANALYSIS DEEMED IT FEASIBLE TO REMOVE OR TO RELOCATE/REBUILD LODGE UNITS THAT NOW ARE TOO CLOSE TO THE RIVER AND ARE WITHIN THE FLOODPLAIN. REMOVING YOSEMITE LODGE BUILDINGS CLOSEST TO THE RIVER IS BOTH FEASIBLE AND HIGHLY LOGICAL IF PHASED OVER TIME. … At the Yosemite Lodge area, instead of removing four Yosemite Lodging buildings in addition to other structures listed in actions common to all alternatives, Modified Alternative 3 would only remove the one Yosemite Lodge lodging building that is closest to the river, leaving the three closest to the road. This would retain 220+ units instead of only 143. It would provide more lodging capacity (increasing user capacity), while expanding the natural habitat area behind the three remaining lodging buildings south of the road. Again, by retaining an additional 75-80 units of lodging, this would reduce the disparity between the current level of use and Alternative 3 as originally crafted.

(Individual; Correspondence #2210)

Response: The NPS evaluated all existing and proposed public use facilities (including camping and lodging facilities) using a rigorous, three-step process. First, this process evaluated whether each facility can be feasibly relocated outside the river corridor, considering economic and technical constraints in addition to resource and safety hazards. Second, if it was deemed infeasible to relocate the facility, NPS evaluated whether the facility is necessary for public use or resource protection. Determinations of the kinds of facilities that are necessary were informed by the National Park Service's Management Policies 2006 and by Yosemite's 1980 General Management Plan (GMP), in addition to WSRA. Lastly, if a public use facility was deemed infeasible to relocate and necessary for public use or resource protection, NPS evaluated whether the facility can be maintained without adverse effects to river values. See "Development of Lands and Facilities" (Chapter 7) for a full discussion. In some cases, this analysis has led to the removal or relocation of public use facilities. In other cases, these facilities are deemed necessary for public use or resource protection and any localized adverse effects on river values (if present) will be mitigated by actions common to all alternatives (See Chapter 7, Table7-1: Evaluation of Facilities within the River Corridor by River Segment and "Alternatives" [Chapter 8], Actions Common to Alternatives 2–6).

Many of the concerns identified in the representative quotes are addressed either in Alternative 5 (Preferred) and/or by actions common to Alternatives 2-6. Across all alternatives, camping sites will be removed within 100 feet of the river and all new development would occur outside of a 150 foot riparian buffer. Where camping facilities are having localized adverse effects on river values, actions are proposed to revegetate river banks and direct public use to more resilient access points. Reductions at both Housekeeping Camp and Yosemite Lodge were analyzed in the range of alternatives. Alternative 5 (Preferred) proposes to remove 34 units at Housekeeping Camp that are located within the ordinary high water mark. Alternative 5 (Preferred) retains the lodging facilities at Housekeeping Camp and Yosemite Lodge because they are necessary to provide for the levels of public use outlined in that alternative.

The NPS has no jurisdiction over the provision of lodging outside park boundaries.

Concern 434: The NPS should increase affordable lodging options within the park.

Curry Village has long been considered the more "affordable" lodging area. The construction of these 98 hard-sided units, each with its own bath, is certainly more upscale than what existed before; and though

a certain number of tent cabins are retained to help balance the overall rate structure, it remains questionable whether a tent cabin at $100/night during peak season is all that "affordable."

(Individual; Correspondence #1618)

By reducing the number of lodging rooms in the park, you would certainly be lining the pockets of the outside lodge owners, who in this case seem to be one or two businesses. The only lodgings that seem safe, because of historical designation, are beyond the price most families can pay. The park should not become only a place for the wealthy.

(Individual; Correspondence #1731)

We do not need 'luxury' employee housing built in the park, but it would be nice to get a lot more 2 and 3 star levels of lodging for the average family who can't afford the Ahwahnee. If we limit the access available to the average working Jane and Joe, it will not be much longer before the National Parks become unimportant to them and future funding will be reduced even further.

(Individual; Correspondence #2313)

Living and working in Yosemite National Park for over 25 years, I've talked with hundreds of guests on this subject and base my position on

their responses, logic, and common sense, with the following changes necessary: More overnight lodging and camping facilities, to reduce excessive traffic to overnight facilities outside of the park. Nearly everyone that I've talked with, concerning this matter, prefer to park their vehicle, stay overnight in the park, and not have to travel to another location for their lodging.

(Individual; Correspondence #2603)

Response: Both increases and decreases in park lodging were considered under Alternatives 2-6. Alternative 6 evaluated significant increases in lodging in order to accommodate growth in peak daily visitation in Yosemite Valley. Alternative 5 (Preferred), however, proposes to retain roughly the same peak levels of visitation and a slight increase in available lodging within Yosemite Valley (5%). In response to public comment, the NPS has revised the actions proposed at Curry Village in order to retain more affordable lodging. For example, Alternative 5 (Preferred) in the FEIS proposes to retain 50 historic canvas tents and 14 non-historic hard-sided without-bath cabins in Boys Town (these units were removed and replaced with hard-sided cabins with baths in the DEIS). Lodging rates are set in review of comparable facilities in comparable locations.

Concern 435: The NPS should retain all historic properties at Curry Village, relocate cabins rather than demolish them, and integrate any new construction into the historic landscape.

Revise plans for wholesale removal of dozens of historic properties at Curry Village by retaining historic cabins; historic cabins should be relocated rather than demolished, and new construction should be integrated into the historic landscape

(Individual; Correspondence #1878)

Response: Changes have been made to Alternative 5 (Preferred) to address stakeholder concerns about the loss of historic properties. Under the revised Alternative 5 (Preferred), instead of removing all of the historic tent cabins, 50 historic tent cabins would be retained. Additionally, the dormitories proposed for the Huff House area were dismissed from the preferred alternative in favor of constructing additional housing in El Portal; the historic Huff House and 10 tent cabins will be retained. Any new development in the area will follow “A Sense of Place” design guidelines to promote an aesthetic that harmonizes with the natural and historic landscape.

Concern 436: The NPS should not construct new lodging accommodations in Yosemite Valley, but should instead reduce in-park lodging and allow free market enterprises in gateway communities to absorb the demand for lodging.

The Curry Village commercial complex is both inside and outside the corridor. Accepting that it is not a significant impact to the corridor, nevertheless the associated lodging and parking significantly result in noise, disturbance, vehicle congestion, crowding, pollution, and extensive development inside the wild and scenic river corridor. It is completely and totally feasible for the lodging units at Boys Town and Curry Village to all be removed so that lodging is instead provided for that percentage of Park visitors outside of the Park at Gateway communities. It is even more feasible to reduce significantly the amount of lodging at Boys Town and Curry Village to reduce the ecological footprint, noise, disturbance, etc. generated by that development.

(Individual; Correspondence #2210)

The DEIS did not provide a hard and vigorous analysis of the feasibility of lodging and guest cabins being removed from Yosemite Valley and allowing free market private enterprises outside of the Park in Gateway communities to profit from the resulting demand, instead of Delaware North. ... IT IS NOT THE RESPONSIBILITY OF THE PARK SERVICE TO ATTEMPT TO MEET ALL THE PUBLIC DEMAND FOR LODGING OR CAMPING IN YOSEMITE VALLEY, FOR AS THE GMP EMPHASIZES, THAT IS NOT THE MANDATE OF THE PARK. ... The FEIS should state very clearly that the GMP has made it clear that the Park does not have the responsibility to provide for high levels of visitor lodging or camping within Yosemite Valley, and that accordingly, there are feasible options for lodging to be provided outside of the Valley and outside of the Park. Alternative 5 continues to conflict with the WSRA by proposing new construction of visitor lodging within the river corridor within Yosemite Valley. ... GMP spells out that "no attempt will be made to meet all the demands for accommodations inside the Park because it would require an unacceptable level of development?" (19).

(Individual; Correspondence #2210)

Generally speaking, we see the reduction of lodging structures in the Merced River corridor as a vital economic opportunity for gateway communities outside the Park. It is a win-win scenario for gateway communities to fill this gap.

(Individual; Correspondence #3694)

Response: The NPS does not have authority to plan (or promote) visitor use accommodations or facilities outside park boundaries. With proposed revisions to Alternative 5 (Preferred,) the number of lodging units proposed in the river corridor has actually decreased below levels at the time of the Merced's Wild and Scenic River designation. The Wild and Scenic Rivers Act does not preclude the development of lodging facilities in a Wild and Scenic River recreational segment, provided that lodging is necessary for public use, cannot feasibly be located outside of the river corridor, and does not adversely impact river values.

Concern 437: The NPS should reduce the density of development at Curry Village to ensure that the kinds and amounts of use will not adversely impact public health and safety.

With respect to Curry Village, sweeping aside the Hantavirus issue by converting tent cabins to hard-sided accommodations does little to address potential causes for the explosion of deer mice that occurred in the first place. It has been widely reported that one factor that may have led to the outbreak is the increase in development of Curry Village; more people are visiting that area, with food in plentiful supply which in turn attracts mice. Additionally, a greater human presence makes it more likely the natural predators of the mice stay away. This is a capacity issue that should have been addressed as part of the '82 Guidelines definition of User Capacity to ensure that the quantity of recreation proposed in the preferred alternative would not adversely affect public health and safety.

(Individual; Correspondence #1618)

Response: A careful review of the administrative record would demonstrate that the NPS was considering replacement of tent cabins with permanent, hard-sided lodging units before the Hantavirus incident. The outbreak of this infectious disease has been attributed to a "bloom" in the local population of deer mice, caused in part by record rainfall in the previous two years, and infiltration of so-called "signature tent cabins." The cases were limited to a limited number of tents, whereas Curry Village consists of hundreds of tents.

Moreover, while the specific number of tent cabins had increased at Boys Town, the combined number of guest accommodations and employee housing has actually declined since portions of Curry Village were closed by a rock fall incident in 2008. The spatial organization and density of development at Curry Village has remained largely unchanged for the last 100 years. Alternative 5 (Preferred) proposes to largely retain current densities of development.

Concern 438: The NPS should not replace rustic accommodations at Curry Village with more upscale accommodation, because these units are less affordable, require additional employees to service them, are visually obtrusive, and are not in keeping with the historic character of the area.

> *the visually intrusive hard-sided lodging proposed for construction at Boystown (25 duplex buildings, two 4-plex buildings, and five two-story 8-plex buildings, all with private baths, plus a new guest check-in building) will "dominate the landscape" and "interfere with the natural setting that visitors have come to enjoy"'a direct result of editing out that part of the Recreation ORV definition that originally was designed to hold such over-building in check*
>
> (Individual; Correspondence #1618)
>
> *the NPS could consider the overall room mix between the Yosemite Lodge and Curry Village and consider keeping the Curry Village accommodations more rustic. We know that this would be consistent with the needs of NatureBridge, to better enable them to continue their environmental education program at cost effective levels and enhance their ability to continue under-served youth in Yosemite Valley.*
>
> (Business; Correspondence #2818)
>
> *The MRP proposes the demolition of 86 historic cabins and tent cabins, and the introduction of 98 new cabins in Curry Village and 16 employee units near Huff House. We are concerned that the demolition of a substantial amount of the remaining guest cabins and the introduction of significant new construction will result in a loss of integrity of the historic district and its removal from the National Register. A different way to address the need for infill is to "recycle" the buildings slated for demolition in the rock fall zone following historic landscape patterns. The scale of the demolition and infill should be reduced in a revised preferred alternative.*
>
> (Civic Group; Correspondence #8329)

Response: The number and type of lodgings in Yosemite Valley has varied substantially over the past 16 years. After the 1997 flood, a significant number of hard-sided accommodations were lost at Yosemite Lodge. Certain changes occurred in Curry Village because of the 2008 rock fall incident, which led to the closure of several historic cabins with- and without-bath. The NPS subsequently removed historic cabins and relocated tent cabins outside the rock fall hazard zone and into Boys Town, Huff House and other areas. The end result was that Curry Village lost a number of permanent buildings that could be used for year-round accommodations. To offset these losses and accommodate year-round visitation and use, park managers have proposed a range of replacement lodging across the alternatives.

However, due to expressed public concern for the NatureBridge program and the historic configuration of tents in the Boys Town area of Curry Village, the NPS has revised Alternative 5 (Preferred). The employee housing proposal has been eliminated from the Huff House area. The revised preferred alternative now

proposes to retain approximately 50 tent cabins and 14 cabins without-bath and reduce the number of new hard-sided units from 98 to 52. The hard-sided duplex and four-plex units would be designed as one-story structures similar in scale and character to the buildings that were lost in the rock fall hazard zone. These structures would be designed and constructed in accordance with the park's "A Sense of Place" design guidelines.

Concern 439: The NPS should convert existing lodging facilities into hostels or construct new, affordable, hostel-type facilities.

> *Yes, create more moderate camping facilities. But, a Youth/Senior Hostel where people would have inside beds and a kitchen to prepare foods would also be ideal.*
>
> (Individual; Correspondence #3230)
>
> *Adding and maintaining lodging structures is less appropriate, as lodging is not an ORV. However, we do support the idea of re-purposing some lodging for an affordable, rustic youth hostel to help diversify overnight options and increase visitation from 1) youth who may not have access to ample camping gear and 2) international visitors who are traveling light. An affordable hostel could also help accommodate climbers who are unable to find sites at Camp 4. A bunkhouse style facility, rather than small, private units, would help decrease the overall lodging footprint while adding a social community component.*
>
> (Individual; Correspondence #3694)
>
> *We also support the sustainable idea of converting some of the existing lodging into higher-density, more rustic and affordable hostel-style units, similar to the traditional small wooden cabins that existed in that area before the massive flood of 1997*
>
> (Individual; Correspondence #7817)

Response: The specific types of existing lodging facilities were shaped by various socio-economic factors that were in effect at the time of design and construction. Neither the Wild and Scenic Rivers Act nor other federal laws would compel park managers to convert existing, functional facilities to other formats or economic models of guest lodging. Existing lodging facilities will continue to be used for their originally intended purposes. NPS concessions management policy addresses lodging rates, which are based on evaluations of comparable facilities.

Concern 440: The NPS should review existing lodging within the Yosemite Valley and determine its appropriateness within a national park setting.

> *Though holding the number of units at Yosemite Lodge to 245 is acceptable, concern remains as to whether 2-story, motel-6 style accommodations belong in a national park.*
>
> (Individual; Correspondence #1618)
>
> *Does the valley really need hotels in the park? Are there any other National Parks with hotels smack in the middle of them that are not historic buildings. The Awhanee is beautiful and historic but the Yosemite Lodge is an eyesore.*
>
> (Not Specified; Correspondence #8002)

Response: The NPS evaluated a range of scenarios under Alternatives 2-6 of the FEIS, including some that significantly reduced lodging in Yosemite Valley. Alternative 5 (Preferred) proposes to maintain daily visitation levels in order to accommodate the same peak levels observed in recent years. Because of this, the FEIS proposes a slight increase in available lodging within Yosemite Valley (5%). The NPS evaluated each existing and proposed public use facilities (including all lodging facilities), using a rigorous three-step process. Each facility was first evaluated in order to determine whether it was feasible to relocate it outside

of the river corridor. If it was deemed infeasible to relocate it outside the river corridor, each facility was evaluated to determine whether it was necessary for public use or resource protection and whether it could be maintained without adverse impacts to river values. Because of the visitation levels proposed under Alternative 5 (Preferred) many of the existing lodging units will be retained (they are necessary to support public use, and all suitable alternative locations fall within the river corridor or would adversely affect river values). Any new development will be designed in accordance with design standards that promote a national park rustic aesthetic. See "User Capacity and Visitor Use Management" (Chapter 6), "Development of Lands and Facilities" (Chapter 7), and "Alternatives" (Chapter 8) for further discussion of user capacity, the evaluation of public use facilities, and proposed alternatives.

Concern 441: The NPS should revise the user capacity analysis and presentation in the EIS to include private lodging within the park and just outside of the park boundaries.

> *Why do I think that the lodging analysis that was presented was insufficient? Mostly because there is a significant supply of private lodging within the Park that wasn't counted as well as private lodging just outside of the Park boundaries which, we were told, also wasn't included in the lodging unit charts for each of the presented alternatives... Near each of the Park entrances there are one or more private lodging venues. The South entrance, Hwy 41, has the Tenaya Lodge, operated by DNC, as well as many smaller accommodations in the Fish Camp area; El Portal has the View Lodge and Cedar Lodge on Hwy 140 near the Arch Rock entrance station; and the North entrance, Hwy 120, has Evergreen Lodge almost at the Big Oak Flat entrance. Clearly, these are mostly overflow lodging for visitors unable to find lodging in the Park itself and are definitely contributors to W&SR capacity considerations. At slightly greater distances are the "Gateway" communities: Oakhurst, Mariposa, Groveland, and Lee Vining being notable. Any consideration of Valley and W&SR capacity definitely needs to consider the effect of these out-of-Valley and out-of-Park lodging units*
>
> (Individual; Correspondence #1881)

Response: Park visitors who stay in private lodging either within the park or just outside the park are included in the user capacity analysis for the MRP. Each person who visits the Merced River corridor is counted in the capacity calculations via the mechanism by which they interact with the corridor. For example, a visitor staying at Housekeeping Camp is spending the night in the river corridor and thus that visitor is counted as an "overnight" visitor. A visitor who is staying in Fish Camp (outside of the corridor) but driving a personal vehicle into Yosemite Valley interacts with the corridor as a day-user and is captured in those calculations.

Concern 442: The NPS should ensure that accessible lodging is maintained for visitors with disabilities.

> *I think most of the # 5 plan is good, but please keep the rooms and parking at the Yosemite Lodge and the Awanee. Handicapped visitors need to enjoy the beauty of Yosemite as well as the able bodied.*
>
> (Individual; Correspondence #2732)
>
> *Yosemite Lodge provides a much needed alternative for lodging in the park, particularly for elderly and disabled individuals who cannot afford to stay at the Ahwahnee Hotel.*
>
> (Individual; Correspondence #2773)

Response: Accessible lodging at the Yosemite Lodge and at The Ahwahnee is retained under Alternative 5 (Preferred). Additional accessible rooms are in the process of being added at Yosemite Lodge as well as improved paths of travel at Yosemite Lodge, Camp Curry and The Ahwahnee. The NPS welcomes visitors with disabilities and continues to make accessibility improvements to facilities, services and programs throughout the park.

Concern 443: The NPS should retain 100 lodging units at Housekeeping Camp, and restore 12.2 acres portion of the floodplain and riparian ecosystem.

> *...retain 100 lodging units as in Alternative 4, and retain shower houses and laundry, reduce restrooms, and remove grocery store. Restore 12.2 acres of floodplain and riparian ecosystem. This is a true win-win compromise solution that allows those who love Housekeeping Camp and who treasure memories at Housekeeping Camp to still have opportunities to experience camping there close to the river. But if there is a single campground that intrudes into what clearly would be a rich, ecologically important riparian and wetland habitat, the bend of the river and the area to be restored as depicted in Alternative 4 is a prime area in need of restoration. It is both feasible to remove the 83 duplex lodging units, four restrooms, the store, and the office out of the ordinary high water mark, and it is necessary for compliance with the WSRA. .*
>
> (Individual; Correspondence #2212)

Response: This suggestion is analyzed in the range of alternatives, as part of Alternative 4.

Concern 444: The NPS should include the 103 units at Curry Village in its lodging inventory in Alternative 1 (No Action), which would show a 7.5% decrease in lodging from current inventory in Alternative 5 (Preferred).

> *The Preferred Alternative reduces the number of overnight accommodations in Yosemite Valley, contrary to the information presented in the MRP. The final plan should maintain the overnight visitor accommodations to at least the current number and keep Merced Lake at its current visitor capacity. ... the MRP claims an increase of approximately 2% (19 units) in the overnight lodging accommodations in Yosemite Valley. This is caused by excluding 103 units that are currently in use at Curry Village from the baseline numbers because the 103 units would need to be removed in the No Action alternative due to the language of the 2009 Settlement Agreement. The Preferred Alternative results in a reduction of 84 overnight accommodations in Yosemite Valley, a decrease of almost 7.5% from the current inventory. Even maintaining the status quo, the number of overnight accommodations is more than 16% below the 1,260 units called for in the 1980 General Management Plan and approximately 25% lower than the 1,512 units that existed prior to the 1997 flood. The No Action alternative actually reduces the number of overnight accommodations by 9% from what exists today.*
>
> (Business; Correspondence #2818)

Response: Per the provisions of the 2009 Settlement Agreement, the temporary accommodations at Boys Town in Curry Village are considered "a temporary fix to an immediate problem" and therefore are not counted as part of the lodging inventory in the No Action Alternative. The final Merced River Plan/EIS increases the overall number of guest accommodations at Curry Village by 82 units (to 482, total), as the result of a decision to retain many of the tent cabins and cabins-without-bath in the Boys Town area, and to decrease the number of hard-sided units originally proposed in the DEIS accordingly. The net increase in numbers of units at Curry Village would amount to a 20% increase at this location. Under Alternative 5 (Preferred), the total number of proposed lodging units in Yosemite Valley is 1,082, which is 14% less than the 1980 GMP proposed and 25% less that the number provided at the time of the river's designation by Congress in 1987.

Concern 445: The NPS should remove Yosemite Lodge and convert the area to serve day-use visitors.

> *Yosemite Lodge: Convert from lodging to day use, parking and camping, possible employee housing*
>
> (Individual; Correspondence #3325)

Response: This scenario was considered under Alternative 2 and subsequently dismissed. There is a high demand for overnight lodging in Yosemite Valley. The Yosemite Lodge was first established as an Army Camp in 1906, converted to a public lodge in 1915, and redeveloped in 1956. The suggested demolition and

subsequent site re-development would be an expensive and unnecessary action when the facility continues to serve a valid public use and does not have an adverse impact on river values.

Concern 446: The NPS should remove Housekeeping Camp lodging and convert the area to a campground.

> *Housekeeping Camp: Remove lodging facilities and replace with camping and day use picnicking; Restoration of the riparian and floodplain 10-year floodplain...*
>
> (Individual; Correspondence #3325)

Response: Similar actions involving site restoration, river access and day-use were considered under Alternatives 2 and 3, and subsequently dismissed. The number of units at Housekeeping Camp will be reduced through the removal of 34 units within the ordinary high water mark, consistent with the park's General Management Plan of 1980. Though full restoration, partial restoration, and day use were explored as potential land uses for Housekeeping Camp, re-developing the area as a campground was dismissed because that re-development would cause a significant amount of disturbance to create a land use that would be very similar to the existing use.

Concern 447: The NPS should remove all Housekeeping Camp lodging units within 150 feet of the river.

> *Housekeeping Camp, however, is a historic camp facility that lies right in the ecological bend of the river in an area where many units now lie within 150' of the water... it is totally feasible to remove units to at least within 150' of the water and still provide the recreational camp use of Housekeeping Camp. For any final selected alternative to allow campsite units to be located closer than 150' of the water will violate the clear intent of the WSRA because such units are NOT necessary in those locations. It is feasible to remove all of Housekeeping Camp, and the lodging/camping provided can either be replaced outside of the Valley, outside of the Park, or simply not replaced.*
>
> (Unaffiliated Individual; Correspondence #2210)

Response: While a 150-foot setback for new and/or redevelopment within the river corridor is an Action Common To Alternatives 2 - 6, the preferred alternative does not propose to remove all existing development within 150-feet of the river. The 1980 Yosemite General Management Plan retained Housekeeping Camp at a reduced capacity. There are no alternative areas of sufficient size, slope, aspect or location to accommodate this lodging facility outside the river corridor in Yosemite Valley, and Housekeeping Camp offers rustic overnight accommodations that promote river-related/river-dependant recreational opportunities. In Alternative 5 (Preferred,) the NPS proposes to only remove those 34 units within the ordinary high water mark (also referred to as "within the bed and banks") of the river. Coupled with the removal of those units, approximately one acre of riparian habitat will be restored. Because of the camp's location, situated on a large sandy bend in the river, its large beach areas are a very popular river access point for both day and overnight visitors. Although not yet evaluated for National Register of Historic Places eligibility, Housekeeping Camp (originally Camp 16) is one of the oldest and continuously used camping areas in Yosemite Valley that currently offers a unique type of overnight accommodation.

Concern 448: The NPS should remove Yosemite Lodge units located closest to the river.

> *Almost the entire Yosemite Lodge facility is within the river corridor, and past plans by the Park Service spelled out the reasons why it was necessary to consider removing some of the lodge units closest to the river. WHAT IS IMPORTANT FOR THIS DISCUSSION IS TO RECOGNIZE THAT THE PARK SERVICE IN PAST PLANNING ANALYSIS DEEMED IT FEASIBLE TO REMOVE OR TO RELOCATE/REBUILD LODGE UNITS THAT NOW ARE TOO CLOSE TO THE RIVER AND ARE*

WITHIN THE FLOODPLAIN. REMOVING YOSEMITE LODGE BUILDINGS CLOSEST TO THE RIVER IS BOTH FEASIBLE AND HIGHLY LOGICAL IF PHASED OVER TIME. ... At the Yosemite Lodge area, instead of removing four Yosemite Lodging buildings in addition to other structures listed in actions common to all alternatives, Modified Alternative 3 would only remove the one Yosemite Lodge lodging building that is closest to the river, leaving the three closest to the road. This would retain 220 units instead of only 143. It would provide more lodging capacity (increasing user capacity), while expanding the natural habitat area behind the three remaining lodging buildings south of the road. Again, by retaining an additional 75-80 units of lodging, this would reduce the disparity between the current level of use and Alternative 3 as originally crafted.

(Unaffiliated Individual; Correspondence #2210)

Response: Removal of the Yosemite Lodge units closes to the river was analyzed under Alternative 2. The suggestion to remove only 3 buildings, rather than four, has been noted.

Concern 449: The NPS should not attempt to meet the demand for camping and lodging within Yosemite Valley because that would require an unacceptable level of development.

The FEIS should state very clearly that the GMP has made it clear that the Park does not have the responsibility to provide for high levels of visitor lodging or camping within Yosemite Valley, and that accordingly, there are feasible options for lodging to be provided outside of the Valley and outside of the Park. Alternative 5 continues to conflict with the WSRA by proposing new construction of visitor lodging within the river corridor within Yosemite Valley. ... GMP spells out that "no attempt will be made to meet all the demands for accommodations inside the Park because it would require an unacceptable level of development?" (19).

(Unaffiliated Individual: Correspondence #2210)

Response: It is not possible to meet all the demands for accommodations within Yosemite Valley, and the NPS has not attempted to do so. Alternatives 2-6 present a reasonable range of a mix of overnight camping and lodging accommodations including that are protective of river values. The Merced River Plan does not revise the language from the GMP referenced in the representative quote, which can be found as language retained in the GMP in Appendix A.

Commercial Operations—Golf Course

Concern 450: The NPS should remove the Wawona golf course and restore the area to its natural condition because the golf course is inappropriate in a national park setting.

The Sierra Club supports: ...- Removal of the golf course and pro shop at Wawona. A golf course is an inappropriate facility and activity in a National Park. It should be eliminated and the area converted to a wetland.

(Individual; Correspondence #1818)

please eliminate the golf course across the road from Wawona. Clearly, that area should be restored to its original, authentic ecosystem. Irrigating a mown, grassy lawn in the national forest for the enjoyment of a few and at the expense of many and the environment is unconscionable

(Individual; Correspondence #2010)

Because golf courses are not part of experiencing the natural and undeveloped park, we support removal of the golf course at Wawona. Golf courses require management and maintenance using water, fertilizers, and (often) pesticides that have a detrimental effect on the native plants, wildlife, and insects. We urge you to remove the golf course. Keep the Park as natural as possible.

(Individual; Correspondence #2070)

Response: Under the Merced River Plan, each public use facility (including the Wawona golf course) was evaluated in the context of: (1) how it was addressed in the 1980 Yosemite General Management Plan, (2) whether it is feasible to relocate outside the river corridor, (3) whether it is necessary for public use or protection of the resource, (4) its potential for local adverse effects to river value(s), and (5) what mitigation measures are required to protect river values. There are no universal criteria to determine what facilities are "appropriate" in a national park setting. All alternatives in "Alternatives" (Chapter 8) retain facilities in the river corridor only when they have been deemed necessary for public use or resource protection (based on Yosemite's 1980 General Management Plan and the NPS' Management Policies 2006) and when they will not adversely affect river values. The Wawona golf course is a component of the Wawona Hotel cultural landscape, which is a component of the Wawona Historic Resources ORV. Opportunities for this type of visitor recreation are unique in terms of setting attributes and the historic setting of the district and are used frequently during the operating months of the hotel. In addition, the Golf Course serves as the spray field for gray water disposal in Wawona, which helps protect water quality.

Concern 451: The NPS should remove the Wawona golf course to comply with the Wild and Scenic Rivers Act.

> *The Wawona Golf Course is outdated and inappropriate in a National Park setting. It is used by a small minority of visitors. To comply with the Wild and Scenic Rivers Act and to restore the meadow complex at Wawona, the Park should close and naturalize the Golf Course.*
>
> (Individual; Correspondence #2056)
>
> *The Wawona golf course would not be removed under the Preferred Alternative despite the extremely broad range of negative resource impacts the golf course causes as described in varying sections of the DEIS. The Merced River Plan DEIS goes into detail about all the negative impacts, including the spread of velvet grass (a highly invasive weed), the fact that the golf course was constructed on a Native American archaeological site, and the determination by planners that a large percentage of Park visitors find golfing to be an inappropriate activity in Yosemite National Park. The Park's documents acknowledge that restoring the Wawona Golf Course to meadow habitat would be beneficial for the Merced River hydrology, wet meadow habitat, special status wildlife species, and other resources. ... The Wawona Meadow is the largest low-elevation meadow in Yosemite, 44 acres of this meadow lie within the Merced River corridor and are still being used for golfing today. To comply with the Wild and Scenic Rivers Act and to restore the meadow complex at Wawona, the Park should close and naturalize the Golf Course. ... OUT OF ALL THE FACILITIES PROPOSED FOR RETENTION IN THE PREFERRED ALTERNATIVE, THE PROPOSED RETENTION OF THE WAWONA GOLF COURSE AND ASSOCIATED COMMERCIAL AND RECREATIONAL OPERATIONS COMBINE TO CREATE THE MOST BLATANT CONFLICT WITH THE WILD AND SCENIC RIVERS ACT AND THE SECRETARIAL GUIDELINES.*
>
> (Individual; Correspondence #2211)

Response: The Wawona Golf Course does not need to be removed to comply with the Wild and Scenic Rivers Act. Under WSRA, public use facilities (such as the Wawona golf course) can be retained in the river corridor if it is infeasible to relocate them, they are necessary for public use or resource protection, and they can be maintained without adverse effects to river values. The golf course was built in 1917 and has been determined, along with the Wawona Meadow to be contributing features of the Wawona Hotel National Historic Landmark which is a component of the Historic Resources ORV for this segment. As shown in "Development of Lands and Facilities" (Chapter 7), Table 7-1: Evaluation of Facilities within the River Corridor by River Segment, the Wawona golf course has no localized adverse effects ("localized concerns") on any of the relevant ORVs.

Concern 452: The NPS should remove the Wawona golf course, regardless of its historic status, in order to enhance the Wawona Meadow.

> *THERE IS NO EXCUSE FOR USING THE HISTORIC STATUS OF THE WAWONA HOTEL COMPLEX TO ATTEMPT TO JUSTIFY KEEPING AN ECOLOGICALLY-NEGATIVE FACILITY IN THE RIVER CORRIDOR.*
>
> (Individual; Correspondence #2211)
>
> *The failure to include the Wawona segment of the Merced River in both the scenic and mid-elevation meadows ORVs appears to be arbitrary and capricious, or is perhaps explained by the ridiculous preference to retain the Wawona Golf Course. Mid-elevation meadows in the Sierra are relatively uncommon, yet the MRP proposes retention of a golf course that has replaced a riverside meadow. If it's important to manage mid-elevation meadows in Yosemite Valley as if they are precious, it is equally important to do so in Wawona (where they are even less common). The MRP (and TRP) proudly suggest removing roadside parking along meadows as a coup, yet prefers retention of a far bigger meadow impact caused by the golf course. The primary justification for retention of the golf course is that it provides recreation that is unique because of its setting (and also that it's part of a National Historic Landmark). Yet, the unique setting applies to other less-impactful facilities but which is apparently not a valid reason to retain them. Removing a facility that is listed on the National Register of Historic Places is also not a barrier, as evidenced by the proposed removal of Sugar Pine Bridge (an action I support). The golf course has a direct negative impact on the Merced River and must be removed.*
>
> (Individual; Correspondence #3402)

Response: Under the Merced River Plan, each public use facility (including the Wawona golf course) was evaluated in the context of: (1) how it was addressed in the 1980 Yosemite General Management Plan, (2) whether it is feasible to relocate outside the river corridor, (3) whether it is necessary for public use or protection of the resource, (4) its potential for local adverse effects to river value(s), and (5) what mitigation measures are required to protect river values. Alternatives in Alternatives (Chapter 8) retain facilities in the river corridor only when they have been deemed necessary for public use or resource protection (based on Yosemite's 1980 General Management Plan and the NPS' Management Policies 2006) and when they will not adversely affect river values. Meadow habitat in Wawona has not been included in the Biological ORVs for Segments 6, 7, or 8 since the time of designation. The Wawona golf course, however, is a component of the Wawona Hotel cultural landscape, which is a component of the Wawona Historic Resources ORV. Opportunities for this type of visitor recreation are unique in terms of setting attributes and the historic setting of the district and are used frequently during the operating months of the hotel. In addition, the Golf Course serves as the spray field for gray water disposal in Wawona, which helps protect water quality. As shown in Chapter 7, Table 7-1, the golf course was retained in the 1980 GMP, has no localized adverse effects on relevant river values, and relocation of the course is infeasible. Removal of the golf course was considered under Alternatives 2 and 3, but dismissed under Alternative 5 (Preferred).

Concern 453: The NPS should relocate the golf course currently located within the river corridor in Wawona outside of the park or the river corridor.

> *the Preferred Alternative 5 proposes to keep the Golf Course, even though only 9,000 people per year golf there (out of 4,000,000 visitors to the Park). Removing the golf course would be a detriment to only 0.23 percent of Park visitors, while it would benefit the remaining 99.78 percent of visitors. ... Within California there are 1,140 golf courses to choose from (http://www.golflink.com/golf-courses/state.aspx?state=CA) .... THE USE (GOLF) CAN BE RELOCATED OUTSIDE OF THE PARK OR OUTSIDE OF THE RIVER CORRIDOR.*
>
> (Individual; Correspondence #2211)

Response: No alternative areas of sufficient size or location are available within the Wawona Hotel complex outside the river corridor to relocate the Wawona Golf Course. This facility is a contributing feature of the Wawona Hotel Complex and the visitor activity is significant as "one of the state's earliest mountain golf courses" and has a high level of historic integrity. Opportunities for this type of visitor recreation are unique in terms of setting attributes and the historic setting of the district; the golf course is used frequently during the operating months of the hotel.

Concern 454: The NPS should remove the Wawona golf course in order to increase the amount of restored habitat within the river corridor.

> *... failure to remove the Wawona Golf Course, tennis courts, and associated uses would also mean less [wildlife] habitat in essential areas of the corridor.*
>
> (Individual; Correspondence #2211)

Response: Please see the response to Concern 452.

Concern 455: The NPS should not remove retail stores from Yosemite Valley because reducing dispersed retail outlets will necessitate additional vehicle trips, thereby exacerbating traffic congestion.

> *The plan provided makes some changes to the buildings around the General Store, including the re-purposing of the Sports Center to a generic visitor centre. This move would then require anyone visiting the valley and requiring additional equipment to visit the Curry Village shopping centre - additional bus or driving time. Whilst I'm not privileged to know what the economic activity in the various stores is, there have been times when I've broken equipment whilst hiking during the day and needed to acquire a replacement. This can be anything from sunglasses to walking sticks to clothing. As a visitor, my expectation on finding the general store and Dengan's Cafe a short walk away is that this is the shopping precint for the Yosemite Valley and that this is where I'd expect to go to find spares or supplies. If the sports shop was not self sustaining then I would suggest that consideration be given to having its role taken up either by the General Store (for the casual supply of walking sticks and other items) wherever possible.*
>
> (Individual; Correspondence #44)
>
> *Removal of Convenience shop and Nature Shop at the Yosemite Lodge--just curious as to why? Now people will have to hop in their cars to go to the store in the Village if they don't want to walk or wait for the shuttle. And they certainly won't be able to ride bikes from the rental stand there any more.*
>
> (Individual; Correspondence #215)
>
> *The Nature Shop removal is not a problem; however removing the store is because:*
>
> > *-you will cause more congestion at the Village Store area because it will be the only store*
>
> (Individual; Correspondence #2995)

Response: The merchandise offered for sale from retail outlets located in the same visitor service core areas can be consolidated. The NPS final Alternative 5 (Preferred) proposes to maintain at least one retail outlet in each geographically distinct visitor service node in Yosemite Valley (Yosemite Lodge, Yosemite Village, Housekeeping Camp, Curry Village and The Ahwahnee).

The facilities that housed the retail outlets that will be removed can then be repurposed for visitor orientation, education, or services commensurate with the proposed use of a given area.

Commercial Operations—Retail

Concern 456: The NPS should consolidate or remove additional retail stores from Yosemite Valley.

I think the stores in Yosemite Village and Curry Village could be consolidated, as well as the stated plans to move some of the "administrative and industrial" buildings out of the East Valley. I don't recall so many shops 20-25 years ago. While the variety and convenience of the shops is nice, if you are trying to expand the riparian area and reduce the human and carbon footprint, removing some of the options for shopping or fast food service would be my first choice.

(Individual; Correspondence #68)

Removal of additional retail, in addition to the actions common to Alternatives 2–6, would make the valley much less commercial, providing mostly for basic needs, with a focus on experiences that are nature based.

(Individual; Correspondence #205)

The Mountaineering store at Curry is well used - why remove it? Maybe combine with the one in the Village?

(Individual; Correspondence #3165)

Response: Please see the response to Concern 455.

Concern 457: The NPS should allow retail for firewood and ice in the campgrounds and at Housekeeping Camp to provide for visitor convenience and to eliminate extraneous vehicle trips to purchase basic supplies.

firewood and ice purchases are the number one reason folks are driving to and from campgrounds. adding a service of deliver or purchase locating in the campgrounds would address this.

(Individual; Correspondence #66)

... during high-use times, purchase of ice, firewood, and basic food stuff should be available in campground to eliminate need to drive to Yosemite Village or Curry for basics. These could be vended from a medium size truck/van at each campground during daytime hours and each evening the truck would return leave to stock up and return the next morning.

(Individual; Correspondence #125)

Response: The revised Alternative 5 (Preferred) calls for the retention of the Curry Village and Housekeeping Camp Stores where firewood and ice can be purchased.

Concern 458: The NPS should retain the Housekeeping Camp grocery store because of its convenience to visitors and to avoid additional traffic congestion from the camp to stores in Yosemite Village or Curry Village.

Please reconsider removing the housekeeping store. Closing the store will create more car trips between housekeeping and curry village for camping needs such as ice, milk, wood,. The store actually decreases the total impact on the valley.

(Individual; Correspondence #1105)

Please reconsider your decision to eliminate the housekeeping store because it's important to have a store near an area with substantial campsites. if you eliminate the store more people would then have to drive to the Yosemite valley store causing more congestion and smog due to increase in vehicle use

(Individual; Correspondence #1178)

I would be very disappointed to see the Housekeeping General store close. It is very handy for the entire Housekeeping camp. Again,it seem to be a cost cutting decision rather than an environmental one.

(Individual; Correspondence #2621)

.... [Curry Village Grocery] was concluded to remain. With respect to as assessment of whether the Curry Village Grocery should remain, the analysis states: "Yes: This grocery provides visitors (as well as park residents) a limited range of merchandise including packaged and fresh groceries, sundries, and outdoor products that are frequently needed by campers and hikers, and day and overnight visitors." Both the Housekeeping Camp and Curry Village grocery stores are within the river corridor and both occupy a portion of a building that has multiple services, so elimination of the service does not eliminate a structure and we can see no basis for differentiating between the two. We know that the elimination of the Housekeeping Camp grocery store will have a detrimental impact on visitor experience, increase traffic congestion and increase congestion at other locations ...

(Business; Correspondence #2818)

It is hard to understand the benefit to Yosemite's visitors or the environment by removing the camp store because Housekeeping Camp will continue to provide a significant level of visitor accommodations in the Preferred Alternative. Removal of the camp store will result in increased traffic congestion and parking requirements at other locations. Camp guests will likely travel in their vehicles to get needed daily supplies such as firewood, ice, and groceries. These items are bulky and heavy and generally require the use of a motor vehicle to transport back to camp if purchased elsewhere. By illustration, if the transactions that occur at Housekeeping Camp were moved to the Curry Grocery store (which is the closest), it would increase waits by more than 20 minutes during peak hours of the day because the Curry store is already at capacity. Add to that the additional traffic caused by the vicinity of Housekeeping Camp to Curry Village. Visitors choosing to drive their car to get supplies must travel on the one-way road system back through Yosemite Village, adding vehicle congestion at three intersections before arriving back at Housekeeping Camp. In addition, the Housekeeping Camp store is located in a portion of the structure shared with the front office operation, so there is no gain from the elimination of a structure if this action is taken.

(Business; Correspondence #2819)

Without the Housekeeping store, Housekeeping campers as well as others who use it, like backpackers and hikers, will have to go to the village, greatly increasing the crowding and traffic there, as well as "wait time" which could be used to enjoy the park.

(Individual; Correspondence #3300)

Response: The revised Alternative 5 (Preferred) retains the grocery store at Housekeeping Camp.

Concern 459: The NPS should retain the Village Sport Shop because it provides a valuable retail service for recreating visitors not available at other retail outlets in Yosemite Valley.

The removal of the ... Village Sport Shop appear to be decisions made in reaction to footnote 5 ... The Sport Shop provides gear that many visitors need if they arrive unprepared for the elements or wish to engage in outdoor activities. The Sport Shop supports river related recreational activities such as swimming and fishing through the sale of swimsuits, floatation devices, life jackets and fishing equipment. The most recent NPS summer visitor survey in 2009 indicated that 57% of visitors to Yosemite were first time visitors. It is not reasonable or fair to expect that all visitors to Yosemite will be self-reliant and fully outfitted for their visit. ... Further, these items are not available at other retail outlets in Yosemite Valley and adding them to the existing facilities will greatly tax their capacity and increase the appearance of commercialism.

(Business; Correspondence #2819)

Response: The service offered in the Yosemite Village Sports Shop is duplicative of other retail offerings in the Yosemite Village area, which serves as geographically distinct visitor service node in Yosemite Valley. The merchandise offered for sale from this facility could be relocated to other retail outlets offered in the Yosemite Village area, thereby allowing the facility to be repurposed for other visitor services. Comparable retail services are offered in other locations of Yosemite Valley such as the Curry Village Mountaineering Shop.

Commercial Operations—Food Service

Concern 460: The NPS should increase visitor facilities, including food service, near day-use parking lots to serve the needs of day visitors.

> *I recommend that the park reconsider the conversion of the existing Village Sport Shop to a non-commercial use. This retail facility is adjacent to the Village Grill, which will continue as food service. Many years ago, facility now known as the Village Grill was the Village Restaurant. One kitchen (currently existing) served both dining options. I feel that repurposing the Village Sport Shop to a non-commercial visitor use is a disservice to the public seeking indoor options for food service on a year-round basis... I have a similar concern about repurposing the space that is now used as a conference/meeting space at the Garden Terrace. That space was previously a casual dining facility that was serviced by the same kitchen that now services the Yosemite Lodge Food Court. To my knowledge, no formal analysis has been undertaken to determine how much, and what type of food services are likely to be needed to meet the needs of day and overnight visitors on a year round basis. At the present time, the park offers upscale dining at The Ahwahnee and Mountain Room, and fast food at the YL Food Court, YL Bar, Curry Village pavilion, Curry Village pizza, Curry Village hamburger stand, Degnan's Pizza, Degnan's Deli and at the snack stand at Yosemite Lodge. With the exception of The Ahwahnee, CV Pavilion, YL Food Court, YL Bar, Degnan's Pizza, all other food service facilities have outdoor seating. Outdoor seating is not desirable during periods of inclement or cold weather. Further, outdoor food service contributes to unwanted human/wildlife interaction. I realize that the plans intends to reduce what some believe is an undesirable level of commercial services. Food service is an essential service, and I recommend that the park give real thought to what indoor food service is needed at all price levels.*
>
> (Individual; Correspondence #2133)
>
> *If it is judged that there should be alternate use of this facility [the Village Sport Shop], we encourage the NPS to consider visitor needs created by the significant additional parking programmed immediately adjacent to this location. Perhaps an expanded food service for the Village Grill to allow year round service or indoor seating so that the service can be provided during inclement weather are viable options, yet were not considered in any of the alternatives. ... With the additional parking, the number of day users will increase at the Lodge, which generally has the heaviest impact in the middle of day. We believe that removing these retail and food service locations will add to the appearance of commercialism, as the facilities will be fewer and those that remain will become more congested both because of the removal of visitor services and the increased parking planned for this area.*
>
> (Business; Correspondence #2818)

Response: The NPS did consider, for example, converting the Village Sports Shop into indoor seating for the Village Grill. However, there is a greater need to provide visitors who park in the Yosemite Village Day-use Parking Area an orientation destination (i.e., a place to get information about the park). As such the repurposing of the Village Sports Shop to indoor seating was not prioritized over visitor information and therefore was dismissed from further analysis.

Concern 461: The NPS should remove or relocate the Curry Pizza Deck.

> *If I had my druthers, I would like to see damn Curry Pizza deck moved elsewhere. Bring back the old Curry Bar - at one time the only civilized watering hole in the Valley...(well, it once was.)*
>
> (Individual; Correspondence #25)
>
> *Why not get rid of the Curry Pizza deck? Put it where the Curry Pool is/was.*
>
> (Individual; Correspondence #41)

Response: Under the 1980 Yosemite General Management Plan, as amended by the 1992 Concessions Services Plan, the Curry Pizza Deck and Bar facility were retained, however the type of fast food service provided was not specified. The NPS has determined that because food service must remain immediately

adjacent to overnight accommodations and because these services are necessary to support day visitors and those overnight visitors who are staying in lodging facilities without kitchenettes, the Curry Pizza deck would be retained under Alternative 5 (Preferred).

Concern 462: The NPS should remove restaurants that do not fit with the purposes of a national park.

> *I would also agree with removing some of the concessions such as pizza parlors and bars with sports on TV - does not fit with the purpose of a national park.*
>
> (Individual; Correspondence #766)

Response: Because the Merced Wild and Scenic River is located in Yosemite National Park, determinations of the kinds of facilities that are necessary for public use are properly made in the park's General Management Plan (GMP), which was intended to resolve such questions and serves as "the basic foundation for decision-making" within the park. Under NPS policy, the purpose of a GMP is to identify "the kinds and levels of management activities, visitor use, and development that are appropriate for maintaining the desired conditions" of resources and "that will best fulfill the purpose of the park." As presented in "Development of Lands and Facilities" (Chapter 7), Table 7-1: Evaluation of Major Public-use Facilities within the River Corridor, food service facilities were retained in the 1980 GMP and are considered necessary for public use to support day visitors and those overnight visitors who are staying in lodging units without kitchenettes.

Concern 463: The NPS should retain and expand commercial food service and grocery facilities in order to meet visitor demand.

> *Removing several of the commercial snack bars and stores is also a crazy idea. Having a snack bar available in the winter is an especially good idea, since it is likely too cold to try to have a picnic. And getting an ice cream at Happy Isles after the hike to Vernal or Nevada Falls is the perfect end to a long hike. Visitors do forget to bring things at times, or they may actually have an emergency and need a grocery or a mountaineering store in order to complete their visit without having to drive out to El Portal or Oakhurst or Oakdale.*
>
> (Individual; Correspondence #2763)
>
> *You propose to remove the snack facilities. What is the point in removing those other than to discourage use? ... The common man has not the time or the money to go to the Awahanee for lunch. The facilities are already built and they are totally appropriate to the real legitimate purpose of the park*
>
> (Individual; Correspondence #3100)
>
> *...the food availability in the park is really minimal, considering how expensive the options provided by DNC are. I would suggest allowing other companies to invest their time and energy in order to provide cheap and good food to tourists.*
>
> (Individual; Correspondence #3371)

Response: Comment noted.

Commercial Operations—Valley Stables, Horseback Rides, and Concessioner Stock Use

Concern 464: The NPS should eliminate all commercial horseback day rides because of its negative impact on the environment, trail infrastructure, and the visitor experience when hiking.

> *Commercial horseback riding I believe should be removed. Once more, it distresses me to know these transformations would result in the loss of jobs for the employees, however we must reference the National Park Service's ideologies when making these decisions. We must remember the government's*

main involvement with the Parks is to protect its resources and natural state. The mules have a strong negative impact on the vegetation beside the trails. Every mule tour through the forest results in a mouthfuls of vegetation loss. Yes, it will mostly grow back, but I do not believe this is in harmony with preservation of the forest's natural state. The second main negativity of commercial horseback riding is horse/mule excrement. Enjoying the park's trails is quickly ruined when shared with commercial mules and horses. Excrement covers the trails and fills the air with a terrible odor. I simply avoid these trails and am bothered such beautiful areas are defaced.

(Individual; Correspondence #59)

Reducing activities like horseback riding in the valley would be a good modification, it will reduce environmental damage to both the trails and the river and provide a better experience for hikers.

(Individual; Correspondence #877)

I am concerned about the plan to reduce the commercial services in the "river corridor."

Horseback riding, I feel could be eliminated. It always appears to be a relatively low volume use with a very high impact within the Valley considering the trails, dust, droppings and the stable area size and smell.

(Individual; Correspondence #1034)

Glad to see day use of horses will be gone.

Some great trails are smelling and fly infested due to the high horse usage.

Deters us from going on those trails.

(Individual; Correspondence #1064)

Eliminate all livestock and stables from the Valley. Do not permit horses on Valley trails. Find another route to supply the High Country.

(Individual; Correspondence #1287)

... continuing to offer commercial day horseback rides is catering to the few at the detriment of the many and of the environment. ... only 0.076 percent of people in segment 7 who utilize day rides from the Wawona stables.

(Individual; Correspondence #2211)

Response: The NPS final Alternative 5 (Preferred) calls for the elimination of commercial horseback day-rides due to crowding and conflicts between hikers and stock on busy trail segments. With the elimination of commercial horseback day-rides from Yosemite Valley and Tuolumne Meadows, this recreational activity will be expanded in Wawona. Because Wawona is less crowded than Yosemite Valley, there will be fewer conflicts between hikers and day-rides on Wawona trails.

Concern 465: The NPS should retain commercial horseback day rides as a unique recreation opportunity that enhances visitor experience.

Getting rid of all commercial day riding opportunities in the valley is unacceptable!

Many visitors use their vacation time as a once in a lifetime opportunity to ride a gentle animal and be treated to the unique sensory opportunities viewing the park from the back of a horse or mule allows. To step up onto an animal is to step back into time for most people and it allows the park to be viewed in a much more relaxed manner than jumping onto a shuttle bus.

(Individual; Correspondence #51)

The horse rides are a way to see part of the park that you might not be able to hike to. And while the horses are not a natural part of the park they are a new experience for children from the city who have no experience with the outdoors.

(Individual; Correspondence #1127)

According to the preferred alternative: All commercial stock day rides would be eliminated in Segment 2 under Alternatives 2-6. For those visitors who are unable to walk a great distance, stock rides provide an opportunity to access Mirror Lake and view Vernal Falls. It also provides an activity for those visitors who spend several days in the valley and desire different types of experiences. The proposed change raises additional issues:

- *Why aren't these same factors true for Wawona?*
- *Many visitors comment that they enjoy seeing stock on the trail. Removing stock rides greatly minimizes the ADA offerings to experience the park. It's not only those who can't walk a great distance, it is also those who can't walk at all. Visitor photography from and of stock rides has also been a long-standing popular experience.*
- *In Yosemite Valley, some of the trails are dedicated stock trails and in Wawona they are all joint use, so the benefit to hikers is not different for Wawona as compared to Yosemite.*
- *Stable facilities in Wawona are a fraction of the size of those in Yosemite Valley.*

(County Government; Correspondence #2956)

Response: Please see the response to Concern 464.

Concern 466: The NPS should retain commercial horseback day rides because this service allows those who are physically challenged to see parts of the park that would otherwise be inaccessible to them.

The horses and mules are a historic part of Yosemite and one of the best ways to see and enjoy the valley.... This is a very important part of the Yosemite experience for many park visitors. It also allows many people who can not physically walk far, to get out and enjoy parts of the Valley they would otherwise have a very difficult time seeing.

(Individual; Correspondence #40)

Please protect our rights to ride horses in the Yosemite Valley...Riding horses allows some of our senior citizens the opportunity to still enjoy the wilds of our great nation.

(Individual; Correspondence #1294)

I am a Disabled and the only way for me to see teh sites and beautiful area of Yosimite is by Horseback riding. By not allowing me to ride horses in the park would end my ability to see this park.

(Individual; Correspondence #1512)

Day Horseback Rides are the only way that many citizens can enjoy Yosemite. Restricting recreational Stock use will severely discriminate against older people, handicapped people, the very young, and anyone who cannot walk easily on trails.

(Individual; Correspondence #1687)

I am handicapped and can ride a horse but cannot walk or hike very far, results of serving our country. So you are going to prohibit me from seeing the only way I get to see the back country. This is discrimination against handicapped people like myself.

(Individual; Correspondence #1717)

Please remember, not all of us can HIKE into a park. Horses are a very important part of our access. Especially for those that cannot walk.

(Individual; Correspondence #1764)

Response: The NPS final Alternative 5 (Preferred) does not eliminate or reduce access for private equestrian use. The commercial horseback day-rides in Yosemite Valley will be eliminated as they lead to crowding and conflicts between hikers and stock on busy trail segments. However, commercial horseback

day rides will be retained and expanded in Wawona, which will serve as the primary destination for visitors who desire this activity. Therefore, private equestrian use, commercial stock use Wilderness trips offered through commercial use operators, and day rides from Wawona provided by a concessioner all remain viable options for visitors seeking to access the park by equestrian means.

Concern 467: The NPS should consider alternatives to the elimination of commercial day rides such as changing the frequency of the rides, reducing their size, or re-routing them away from the Merced River.

> *I am very surprised by you wanting to get rid of the day rides mainly because of the positive feedback I get on a daily basis. What I am thinking is what about a compromise. For instance, when we do the Mirror Lake ride, why can't the hikers have the north side and the riders only go on the south side trail? Why don't you just designate certain trails for stock trails?*
>
> (Individual; Correspondence #466)
>
> *I think that the option of Horse-back riding in Yosemite Valley must be retained. I consider that proper management of the frequency of rides would allow the environment to be maintained in a sustainable way. Obviously summer will be the peak period and perhaps the number of daily rides must be minimised.*
>
> (Individual; Correspondence #1010)
>
> *Can we reroute the day rides? Currently all the two hour rides leave on the same trail, around the shoe shop along side the meadow. Once to the Tenaya creek bridge one ride goes north of Mirror lake, the other ride goes south. There was a rock slide years ago that made the loop around mirror lake impassible. The rides go out for an hour and turn around. When coming back the North side ride goes through backpackers camp. The south side ride heads towards happy isles and finishes off along side the Merced River. We can reroute the rides so that they are not riding along the merced river. Look at a map of the park. try to propose alternatives to the trails we take.*
>
> (Individual; Correspondence #1366)
>
> *here are a few things that I propose lowering the amount of people on the rides. Currently we books the two hour rides to a max of about 24. And the four hour rides are booked at a max of 12 people. We have six two hour rides and two four hour rides in one day. What if we only do three two hours rides instead of six?*
>
> (Individual; Correspondence #1366)
>
> *In areas of known or documented resource conflicts or damage, the DEIS should consider alternatives beyond simply eliminating stock use. Such alternatives could include reroutes of trails, hardening of trail surfaces, and/or seasonal or biannual limitations to certain areas.*
>
> (Individual; Correspondence #1983)

Response: The NPS considered alternatives to the elimination of commercial horseback day rides in Yosemite Valley such as changing the frequency of the rides, reducing their size, or re-routing them away from the Merced River. However, because the day rides lead to crowding and conflicts between hikers and stock on busy trail segments in Yosemite Valley, the NPS has determined they would be best provided in Wawona, where there is less crowding than in Yosemite Valley, which will serve as the primary destination location for visitors who desire this activity.

Concern 468: The NPS should allow overnight boarding of private stock at the Curry Village Stables.

> *If you shut down the day rides, can we use that parking lot for private stock trailers and parking only? Can we board private stock in the stables?*
>
> (Individual; Correspondence #1366)

The Plan states that private stock will still be allowed. But there will be no place to keep them. I asked J.R. if he would keep the stables open for boarding private stock if he was no longer allowed to rent out horses and mules. He said no, he would not. He would keep the stable open because he uses it as a base for supplying the back country with mules and supplies, but he would not board private horses.

(Individual; Correspondence #1975)

The Plan is also inadequate in addressing the private use of stock in the Valley. It states that private stock will continue to be allowed, but fails to realize that this will not be possible because there will be no place to stable stock overnight because the concessioner is not willing to board private horses if commercial rides are discontinued. So in effect the Plan bans all horses and mules, including private stock, from the Valley.

(Individual; Correspondence #2249)

Response: Whether or not to continue to allow private stock boarding at the concessioner stables is an operational issue beyond the scope of the Merced River Plan.

Concern 469: The NPS should not expand commercial horse day rides at the Wawona stable.

Wawona stable: This is currently the smallest of the three existing concessioner stable locations, and is sited between the South fork of the Merced River and a roadway. The MRP does not sufficiently describe how visitor services for day rides will be provided if the demand for that service exceeds the limits of the Wawona Stable if the existing Tuolumne Meadows and Yosemite Valley stables are closed. If the park wishes to continue to offer day rides in any location, it seems that a detailed analysis of what is likely to be needed to support such an operation should take place before eliminating any of the three facilities. In saying this, I am not advocating for the retention of all three stables, but for a reasoned determination of what will be needed for a successful operation of any public stable in the future.

(Individual; Correspondence #2133)

Moving the day horseback rides to Wawona is a bad idea. First of all there is not enough parking or room for more stock, and the barn is in disrepair and needs a new roof, and Wawona will become heavily impacted.

(Individual; Correspondence #2325)

We are also concerned by the MRP's call to expand the horseback riding services in Wawona to make up the loss of the services in the Valley. The Wawona stable is in the WSR corridor, just like the Valley stable. However, there are many other characteristics that are not similar, such as: ? The Wawona stable is much smaller than the Valley stable. It currently has 25 head of stock and can accommodate only 42. Accordingly, the number of rides cannot come close to replacing the rides lost in the Valley, which is inferred in the MRP. The 90 head of stock dedicated to this purpose cannot relocate to Wawona. ? 100% of the trails in Wawona are joint use trails with hikers. Without the dedicated trails that exist in the Valley, the conditions that NPS describe would continue and potentially worsen. ? The most popular ride, the two-hour ride, crosses the main road twice in Wawona on its established route. Adding frequency to this ride would further impact road traffic along Highway 41. ? One of the main benefits of the Valley rides is ADA access to famous and remarkable views that can only be seen from the back of a horse by this user group. The equivalent views do not exist at Wawona. The Chilnualna falls half-day ride is currently only operated early in the season as the trail is very hot later in the summer and the falls dry up. ? There are no available employee bed spaces in Wawona and the MRP did not include an evaluation of housing along this section of the WSR. We know that additional housing would be necessary to provide for this added scope of services.

(Business; Correspondence #2818)

Response: The Wawona Stables can accommodate up to 42 head of stock, but the current average is 25 head of stock. The NPS has determined that commercial day rides would best be provided in Wawona (inside the corridor) because there is adequate facility space to increase the herd and therefore expand

commercial horseback day rides from this location. Since Wawona is less crowded than Yosemite Valley, this area has the potential for fewer conflicts between stock and other trail users.

Concern 470: The NPS should retain commercial horseback day-rides in Yosemite Valley because they were found to "consistent with the protection and enhancement of river values" in Wawona.

Page K-4 (Appendix K, page 4) does not state any "issues" in the Issue Statement column about "Concessioner Stables in Yosemite Valley." The Issue Statement column merely describes the use of the facility. Furthermore, Table 7-1 has "None" and "None" in the columns labeled "River Value Affected by Facility or Service" and "Local Effect on River Values" of "Commercial Horseback Day Rides in Yosemite Valley." And in the column "Mitigation Required or Action Proposed to Address Local Effects," it says "No required action or mitigation measure." I don't understand the apparent contradiction. If the rides are not affecting any river value and no required action or mitigation is needed, then I fail to see how the Draft CMP/EIS justifies discontinuing the rides in the Valley

(Individual; Correspondence #1975)

The National Park Service (NPS) proposes in the Merced River Plan DEIS under alternatives 2 through 6 the elimination of commercial horseback rides originating from the Curry Village stables ... The NPS does not provide any justification for the elimination of this historic service to the public. On page 8-87, Table 8-11 Necessity of Major Public Use Facilities and Service - Common to Alternatives 2-6, Commercial Horseback Day rides in Yosemite Valley, the justification for elimination given states as follows: "To date, the stable operations in Yosemite Valley provides a seasonal commercial guided equestrian services for recreational use. This facility and service also supports the High Sierra Camp operations." This statement rather than spelling out a justification for elimination of this operation rather appears to justify the benefit for continuing operations based upon a recreational need. BCHC [Backcountry Horsemen of California] feels that the elimination of stables and commercial horseback rides is totally unnecessary and unjustified. This operation provides a recreational use that is historic and is proven to be a much desired aspect of the recreational experience when visiting Yosemite National Park.

(Individual; Correspondence #1983)

Under the Preferred Alternative, the Park Service addresses concession day rides in Wawona. The plan specifically states that the Wawona commercial day rides have been found to be "consistent with the protection and enhancement of river values". Consequently, the same conclusion can be drawn when addressing concessions day rides in Yosemite Valley.

(Individual; Correspondence #1984)

One cannot conclude from the data provided that stock rides in the Valley result in an adverse impact on the river quality and the MRP states the activity does not adversely impact ORVs. Further, horseback riding and stables are not specifically mentioned in footnote 5, adding further interest in the motivation for this action.

(Business; Correspondence #2819)

The DEIS lacks justification for the elimination of this historic service to the public. For example, Table 7-1 in the Facilities and Services Analysis indicates that the Curry Village Stables and the Commercial Horseback Day Rides in the Yosemite Valley have no adverse effect on Wild & Scenic River values.

(Individual; Correspondence #2912)

Other than the proposed reroute of the stock trail to Happy Isles, the DEIS fails to qualify or quantify any threats to Wild and Scenic River values of the Merced River as a result of recreational stock use in Yosemite Valley. For example, Table 7-1 in the Facilities and Services Analysis (DEIS, p.7-4) indicates that the Curry Village Stables and the Commercial Horseback Day Rides in Yosemite Valley have no adverse effect on Wild and Scenic River values nor adverse Local Effect on Wild and Scenic River Values. The DEIS also states "Current water quality in all Merced River segments is high, with most water quality sampling results near natural background levels" (DEIS, p. 5-23). Table 5-3, Management

Actions and Trigger Points to Maintain Desired Conditions for Water Quality, states: "If impacts result from stock use, redirect/ reduce/ limit stock use in certain areas." This implies that there currently exists no threat to water quality from commercial horseback rides.

In the absence of documentation of adverse physical impacts, the DEIS resorts to statements that appear not to be supported by science, much like those used in Appendix L, Determination of Extent Necessary, as described elsewhere in this comment letter.

(Individual; Correspondence #29325)

Response: Please see the response to Concern 471.

Concern 471: The NPS should remove all commercial horse and stable operations from Yosemite Valley.

I strongly support the proposal to end commercial horse rides in Yosemite Valley, but it's NOT ENOUGH. Please remove entirely the commercial stables from Yosemite Valley.

(Individual; Correspondence #2227)

Response: The 1980 Yosemite General Management Plan called for the Curry Stables to be relocated (site not specified); and commercial horseback day-rides reduced and limited to the eastern end and south side of Yosemite Valley. The NPS has determined that it is not feasible to relocate the Curry Stables under Alternative 5 (Preferred) as there are no other suitable locations for a stable operation outside the river corridor in Yosemite Valley that are of sufficient size or proximity to the Valley trail system used to access the Merced Lake High Sierra Camp. While the Curry Stable operation supports the High Sierra Camp operations and multi-day backcountry stock supported trips, commercial horseback day-rides lead to crowding and conflicts between hikers and stock on busy trail segments. With the elimination of commercial horseback day-rides from Yosemite Valley and Tuolumne Meadows, this recreational activity will be expanded in Wawona. Because Wawona is less crowded than Yosemite Valley, there will be fewer conflicts between hikers and day-rides on Wawona trails.

Concern 472: The NPS should remove commercial horse operations from Yosemite Valley and Wawona because of the adverse biological impact, especially on wildlife, resulting from the stables.

The presence of stock animals in the Curry Village Stables has introduced and supported the non-native brown-headed cowbird. Therefore the retention of the stables as per Alternative 5, perpetuates negative impacts on native species when it is the responsibility of NPS to rectify problems stemming from recreational activities in the river corridor as per the Secretarial Guidelines...Removing the Wawona stables would do more than just reduce the conflict between hikers and horseback riders. The stables attract brown-headed cowbirds to the area; these "nest parasites" are known to adversely affect the native bird population. Removing the stables would also benefit other wildlife species (such as the Yosemite toad, Sierra Nevada yellow-legged frog, Willow flycatcher, Northern goshawk, jackrabbits, and the Mount Lyell shrew) and benefit the river by reducing soil compaction and vegetation trampling...

- As shown in the quoted sections of the DEIS, the presence of stables and corrals results in increased incidence of cowbird intrusion that significantly harms many native songbirds and migratory bird species that utilize riparian habitat within the river corridor. To be consistent with the Secretarial Guidelines, facilities that adversely affect ORV resources in the river corridor must be removed or relocated outside of the river corridor. CSERC asks for the FEIS to fully acknowledge the conflict between retaining the stables and the Secretarial Guidelines, due to the stables creating the negative attraction for cowbirds.

(Individual; Correspondence #2211)

Response: Halterman et al. (1999) conducted a preliminary study to assess the impact of brown-headed cowbird parasitism on native songbirds in Yosemite, as part of a multi-park study. The authors did not find that certain management practices, such as horse packing stations, encouraged brown-headed cowbirds enough to be a significant factor in the level of cowbird parasitism. However, the authors point out a number of biases in their dataset that may have resulted in an underestimate of the effects of parasitism on nests. In order to better understand the significance of the issue, Yosemite biologists began conducting systematic point count surveys in Yosemite Valley in 2010. These data provide an important reference point for tracking population trends of cowbirds and their host species in Yosemite Valley. If the park detects a decline in the population of a certain host species (e.g., warbling vireo, yellow warbler), focused research that attempts to find host nests in very early stages, combined with cowbird population monitoring would be needed to clarify the significance of parasitism effects.

Yosemite National Park acknowledges the public concern about the stables and their role in attracting brown-headed cowbirds. This issue was considered when the NPS developed the range of alternatives for the Merced River Plan. Whereas Alternative 5 (Preferred) retains the stables, the Yosemite Valley Concessioner Stables is eliminated in Alternatives 2 and 4. The Wawona stables are eliminated in Alternatives 2, 3, 4, and 6. The day-rides that originate from the Concessioner Stables in Yosemite Valley are eliminated in Alternatives 2–6. The Wildlife section of "Affected Environment and Environmental Consequences" (Chapter 9) discusses impacts of brown-headed cowbirds.

Concern 473: The NPS should relocate the concessioner stables outside of Yosemite Valley or co-locate them with the NPS stables to reduce the environmental impact on the river.

> *The concessioner stable/housing could feasibly be located outside of the Valley and outside of the Park, but at the very least it could be combined with the Park stables that lie outside of the river corridor. It is not "infeasible" to relocate the concessioner stable, which produces high nutrient contamination in close proximity to the river, as well as smells, manure, and other degradation of the river corridor. ... CSERC also asks ... relocating the concessioner stables to join with the NPS stables, thus eliminating one of the two sources of attraction for cowbirds*
>
> (Individual; Correspondence #2210)
>
> *The Park should prioritize an assessment of the possibility of co-locating the concessioner stables with the Park Service stables outside of the river corridor*
>
> *Interactions with individuals associated with the concession stable operations indicate that the co-location of the Park Service and concession stables at the Park Service stables, outside of the river corridor, is clearly feasible. The MRP should fully evaluate this possibility and at very least justify why the co-location is not an acceptable option. Our Center believes it to be a viable solution to the many problems caused by the location of the concession stables within the floodplain and in such close proximity to the river. We heard Kathleen promote maintenance shop facilities being relocated to the area near the current NPS stables, but the maintenance shop facilities could honestly be relocated out of Yosemite Valley or even out of the Park. If the concessioner stables are determined to actually be "necessary" to maintain the High Sierra Camps (which CSERC believes is not justified and is not a decision to be made in this Merced River Plan), then at the least the concessioner stables should be moved out of the river corridor. Co-locating them with the NPS stables makes the best sense and poses the lowest level of resource impact.*
>
> (Individual; Correspondence #3404)

Response: Relocating the NPS stable to the site of the existing Concessioner stable was considered but dismissed as infeasible at this time due to a number of issues. In order to consolidate the stables at this site, the facilities would need to be expanded to ensure adequate separation between NPS and Concessioner

stock, administrative areas, and employee housing, which would result in an expanded footprint of facilities within the river corridor. Consolidation at the NPS stable site is also not feasible due to the limited space available for facilities in the NPS maintenance area and potential conflicts between transporting stock and trailers where the Valley bus fleet will now be serviced.

Relocating the stables outside of Yosemite Valley would also prove logistically challenging with the transport of stock and trailers to the various trailheads in the Valley. The current location of the concessioner stable provides the most logical access to trailheads with minimal conflict on Park roadways.

Concern 474: The NPS should clarify stock impacts to Wilderness meadows and trails in order to justify the restriction of horse and stock use in wilderness areas.

> *The DEIS focuses exclusively on the meadows near the administrative site near Merced Lake. However, don't all pack stock graze in meadows when traveling to and from destinations in the wilderness regardless of whether palletized feed is being use for not? Does this plan only apply to that single meadow in terms of pack stock use? If so, why? Does the proposed plan take into account grazing along the route or only allocated grazing at destinations? If the latter, what are those destinations other than the administrative site? ... The DEIS, rather than projecting numbers, leaves it up to future monitoring that would occur on an infrequent 3 to 5 year basis, to come up with a carrying capacity. Even the multiple-use land management agencies monitor livestock allotments on an annual basis to ensure that the annual operating plans or their equivalent are being followed.*
>
> (Individual; Correspondence #2730)
>
> *What is the carrying capacity of the wilderness sections of the wild rivers in terms of number of stock? In any case, does maximum carrying capacity, which is generally a process to determine livestock grazing capacity on lands under multiple-use mandates, even apply to a National Park? In other words, shouldn't the National Park Service first determine what condition the meadows should be in, after public involvement, and then determine what kind of pack stock use, if any, might be compatible, in the meadows? Unfortunately, just as the multiple-use agencies default to the status quo, which is almost always an over allocation, the NPS here defaults to current use patterns without exploring a range of alternatives, as required by NEPA.*
>
> (Individual; Correspondence #2730)

Response: The NPS is currently assessing the extent of recreational impacts to meadows and riparian habitat throughout the river corridor. In Segment 1, several meadows are monitored for both the bare soil indicator and the meadow fragmentation indicator. The administrative site near Merced Lake is only one meadow within this system and will be monitored along with other meadows where grazing or recreational use occurs. The NPS has analyzed a range of actions to protect meadows in Segment 1. The NPS has developed a grazing capacity for the Merced Lake East Meadow under alternatives 3, 5 and 6. Under Alternatives 2 and 4, this meadow is closed to grazing, so pelletized feed must be packed in. Additionally, the NPS has revised the EIS to include limits on the number of stock used to resupply the Merced Lake High Sierra Camp.

Concern 475: The NPS should retain the concessioner day rides in Yosemite Valley because horses travel only on trails designated for stock use, the concessioner pays to help maintain the trails, and many visitors enjoy interacting with stock.

> *Erosion and trail damage were cited as adverse impacts of stock use. However, in Yosemite Valley, stock is confined to trails that are built to support stock use (i.e. paved/cobble stones) and specific funding is contractually provided to NPS from DNC to maintain those trails. Conflicts with anti-stock visitors are noted as detracting from the visitor experience and removing horseback riding as the solution to enhance their visitor experience. What this solution ignores is the impact on the visitor*

experience of the visitors who choose to go horseback riding and those hikers and others who enjoy engaging with stock on their visit. Their experience is not enhanced; it is eliminated.

(Business; Correspondence #2818)

Response: Comment noted.

Visitor Use—Horseback Riding/Stock Use

Concern 476: The NPS should retain private and commercial horseback riding because horse riders should have the same access opportunities as other visitors.

It concerns me that the NPS is considering the removal of commercial and private animals and stock in our park. Horsemen, horse riders, packers and other stock handlers should have the same right as any hiker, mountain climber, day visitor, or camper to use and enjoy the beauty of Yosemite as they choose.

(Individual; Correspondence #323)

The National Parks and Forests were created for all people to enjoy and the use of livestock does not damage the land any more than foot traffic does. In fact from my experience the horseback rider has been a better steward of the land than your average hiker.

(Individual; Correspondence #1848)

Response: The NPS final Alternative 5 (Preferred) does not eliminate or reduce access for private equestrian use, nor does it propose to eliminate administrative packstock use. The commercial horseback day-rides in Yosemite Valley will be eliminated as they lead to crowding and conflicts between hikers and stock on busy trail segments. The NPS has determined they would be best provided in Wawona (inside the corridor) which will serve as the primary destination for visitors who desire this activity.

Concern 477: The NPS should not increase restrictions on where horses are allowed.

I do not want any more restrictions on where we can ride, horses are a part of nature and we should be allowed to enjoy nature from a natural way, riding a horse.

(Individual; Correspondence #259)

Please.... do not take away any more places for equestrians to ride. The open space is getting smaller and smaller . I can't take a hike due to severe arthritis in my ankles and a knee replacement but i can last several hours on horseback. It is the only way for me to enjoy Yosemite,Sequoia,Kings Canyon, Edison Lake, Devil's bathtub,squaw leap,etc.

The historical contributions that horses have given our country may be over but even riding for pleasure should never be a forgotten part of our american way.

(Individual; Correspondence #324)

Limitations proposed for stock use [including commercial day rides] should not be justified as necessary to promote the enjoyment of "solitude" by other visitors or for purposes intended to enhance the recreational opportunities or experiences for other users who prefer not to share trails with stock and stock users. Such decisions are better served and analyzed by a comprehensive recreation or similar type of plan that addresses the cumulative impact of all such visitor uses which this DEIS does not do.

(Individual; Correspondence #1983)

Response: The NPS final Alternative 5 (Preferred) does not eliminate or reduce access for private equestrian use. Please see the response to Concern 476.

Concern 478: The NPS should provide additional analysis in the EIS to determine the degree of hiker/stock conflicts, and develop a range of alternatives to mitigate any impacts that meet the threshold of "significance" under NEPA.

No user study was done [regarding horseback riding], similar to what was accomplished by the rafting study, so we do not know what a study would indicate as to the appreciation for this historic activity. Wranglers report that they commonly come in contact with hikers who appreciate the sight and sound of stock on the trail and we believe the results of such a survey would be surprisingly in favor of stock use.

(Business; Correspondence #2818)

Draft EIS is inadequate because its conclusion to limit commercial horse/stock use on the basis of "preferences" reported by other backcountry visitors is both biased and flawed... The DEIS fails to document the degree of concern or magnitude of reported conflicts between other Wilderness visitors and horse/stock users. It contains no supporting documentation to warrant the restrictions currently proposed for commercial stock use. The DEIS is deficient in this regard, as is the DEIS for the Toulumne Wild & Scenic River Management Plan, as proposals to restrict stock use in both plans hinge largely on the reported "perceptions" of a single user group.

(Individual; Correspondence #2868)

There is no documented evidence of damage to the Merced River due to the use of horses and pack animals, and it appears to be personal preferences against commercial services to eliminate the day rides in the Valley and Wawona, and to seriously curtail packing in the wilderness. The Plan neglects to state that the elimination of day rides would adversely affect the experience of many visitors to Yosemite, and may in fact, result in visitors deciding to no longer care about – or visit Yosemite.

(Individual; Correspondence #3483)

Only the Purpose and Need section of the DEIS declares a rationale for the need to address hiker/stock conflicts; see Table 2-2, Issues Identified in Public Scoping (DEIS, p. 2-16). The table lists, among 90 other issues listed as "within the scope" of the Merced River Plan/DEIS, the following: "The NPS should remove or reduce hiker-stock conflicts on trails." Listing of this issue is followed in Table 2-2 by the issue: "The NPS should continue to allow horseback riding in the Merced River corridor." Presumably the two comments would be analyzed equitably in the DEIS. It is clear they were not, as the DEIS demonstrates overt bias by the fact that each action alternative (Alternatives 2 – 6) proposes to limit commercial stock use while failing to explore other measures to mitigate perceived conflicts, documented or not.

The DEIS therefore fails to document concerns of significant conflicts between hikers/backpackers and

horse/stock users that form the basis for proposed restrictions in commercial stock use. The issue appears based primarily on anecdotal evidence and is blown out of proportion. As such, it does not begin to approach the threshold of "significance" under NEPA that triggers a need for mitigation. The proposal in the DEIS to restrict commercial stock use in Wilderness is all the more puzzling when such use is reported to be very low relative to other type of overnight visitation. For example, the DEIS states (page 2.2-16) "recreational use of stock animals within the Merced River corridor by commercially guided pack trips and private individuals is low" and that from 2004 to 2010 "commercially guided pack trips averaged only 48 stock use nights, which represents less than 3% of all the guided pack trips that occurred in Yosemite Wilderness areas." We assume these figures do not include concessioner-operated trips to, and operation of, the Merced Lake High Sierra Camp. If correct, the DEIS fails to justify how its proposed restrictions on commercial stock use in Wilderness portions of the Merced River corridor are both prudent and necessary, particularly when such use appears to represent a small fraction of all such use.

(Individual; Correspondence #29325)

the DEIS lacks documentation of the degree and severity of reported hiker/stock conflicts to date. Consequently, we can only assume that the Park Service is responding not to actual documentation of such conflicts but, rather, unsupported statements made during public scoping meetings or in other public venues. However, in areas of known or documented resource conflicts or damage, the DEIS

should consider alternatives beyond simply eliminating stock use. Such alternatives could include but should not be limited to reroutes of trails, hardening of trail surfaces, and/or seasonal or biannual limitations to certain areas. Other than rerouting the stock trail to Happy Isles, the DEIS fails to explore such alternatives.

(Individual; Correspondence #29325)

Response: The limits on commercial stock use in the wilderness portions of the Merced River corridor are in response to the requirement within the Wilderness Act that commercial uses of Wilderness be prohibited except where necessary to achieve the purposes of the act. The importance of this requirement was recently highlighted in litigation against the National Park Service in Sequoia/Kings Canyon national parks, where a federal judge mandated that the agency prepare this specialized finding to supplement the recently-completed general management plan for these parks.

For the Merced River Plan, these limits, and the rationale for them, are discussed in Appendix L (Determination of the Extent Necessary for Commercial Services in the Wilderness Segments of the Merced Wild and Scenic River Corridor), and will result in a very modest reduction in commercial use in the Wilderness. This impact is disclosed in the Visitor Experience impacts analysis of Chapter 9, Affected Environment and Environmental Consequences. Additional limits are proposed on the packstock needed to resupply the Merced Lake High Sierra Camp; these limits are based on the average stock use currently needed to resupply the camp.

In both cases, there will be little change to the spatial and temporal distribution of packstock use in the Wilderness portions of the Merced River corridor. Some conflict between some hikers and packstock users will continue; the forthcoming Wilderness Stewardship Plan will address such conflicts on a Wilderness-wide scale. While some Wilderness hikers are indeed pleased to encounter packstock on trails, others are not, as indicated in a recent survey of Wilderness users in Sequoia-Kings Canyon National Park, just south of Yosemite (see Alan Watson, et al., "Sequoia and Kings Canyon National Parks (SEKI) Wilderness: Taking Stock of Visitor Perceptions and Trends, Manager Recollections, Long-term Observations and Resource Conditions," draft report to Sequoia/Kings Canyon National Park, Jan. 2, 2013).

The NPS final Alternative 5 (Preferred) proposes to eliminate the commercial horseback day-rides from Yosemite Valley primarily because they have a very low rate of usage and the land allocation within the corridor for the stables operation is disproportionately large given the declining number of users (the stable maintains substantial overcapacity relative to the demand for this service). Commercial day rides also contribute to hiker/stock conflicts on busy Yosemite Valley trails. Alternative 5 (Preferred) proposes no change to private stock use or access in any river segment.

Concern 479: The NPS should regulate stock in the Wilderness using a measure of heart beats or feet and legs, rather than party size.

The stock allocation issue, be it for commercial or other purposes, is a problem and confusing. Rather than party size, a more appropriate measure may be by heart beats or better yet, feet/legs. A stock party of 15 people will cause much more damage because there would be up to 25 horses (15 riding stock and ten pack stock). However, the ratio shows 1 stock to very 1.5 visitors. Please explain this discrepancy.

(Individual; Correspondence #2730)

Response: Having one group size limit for stock in the Merced River corridor and a different one for the rest of the wilderness wouldn't be practical or feasible for park managers. However, group size limits will be reconsidered in the upcoming Wilderness Stewardship Plan.

Concern 480: The NPS should address the economic viability of reduced group size and trip frequency for commercial stock outfitters and guides.

> *The reductions in both the group size and frequency of trips using pack and saddle stock in all of the action alternatives effectively negates the economic viability of conducting pack trips. The document cites several legal opinions regarding the commercial use of wilderness, but fails to include citations that actually support commercial use.*
>
> (Individual; Correspondence #3483)
>
> *The DEIS fails to disclose the popularity of guided day rides in Yosemite Valley and fails to document the number of people who participate in stock-assisted trail rides and the socioeconomic impacts of their elimination. The website of park concessionaire DNC Parks and Resorts of Yosemite claims the following with respect to the Yosemite Valley Stables: "Riding excursions are popular activities. Reservations are strongly recommended." . . .*
>
> *The DEIS lacks discussion of the number of visitors who would be adversely affected by the proposed elimination of guided day rides in the Valley. In addition, the DEIS fails to describe the socioeconomic impacts of their elimination*
>
> (Individual; Correspondence #29325)

Response: None of the alternatives change the existing group size limits. The NPS did analyze the effect of the proposed restrictions on current use patterns and found the effect to be negligible. Only a few commercial trips would be displaced from two zones of the river corridor; these trips could easily be changed to camp outside of those zones. Please see the displacement analysis in "Alternatives" (Chapter 8), and the Visitor Experience section of "Affected Environment and Environmental Consequences" (Chapter 9).

Concern 481: The NPS should require that stock animals be outfitted with manure catchers.

> *When stock animals must be used, their numbers should be as few as possible, and every feasible effort must be made to avoid water pollution from animal wastes, such as by requiring that all stock animals be outfitted with manure catchers, which are now readily available and inexpensive. (See, for example, www.bunbag.com and www.equisan.com.au.)*
>
> (Civic Group; Correspondence #3125)

Response: While manure catchers are sometimes used in urban settings, they are not practical for the longer time periods required for wilderness travel.

Concern 482: The NPS should remove the Wawona stables and eliminate commercial day rides because only a tiny percentage of visitors use this service, which causes significant resource impacts.

> *... continuing to offer commercial day horseback rides is catering to the few at the detriment of the many and of the environment. ... only 0.076 percent of people in segment 7 who utilize day rides from the Wawona stables.*
>
> *Removing the Wawona stables would do more than just reduce the conflict between hikers and horseback riders. The stables attract brown-headed cowbirds to the area; these "nest parasites" are known to adversely affect the native bird population. Removing the stables would also benefit other wildlife species (such as the Yosemite toad, Sierra Nevada yellow-legged frog, Willow flycatcher, Northern goshawk, jackrabbits, and the Mount Lyell shrew) and benefit the river by reducing soil compaction and vegetation trampling...*
>
> (Unaffiliated Individual; Correspondence #2211)

Response: Though a small proportion of visitors use this service, the NPS has determined that commercial day rides would best be provided in Wawona (inside the corridor) because there is adequate facility space to increase the herd and therefore expand commercial horseback day rides from this location. The Wawona

Stables can accommodate up to 42 head of stock, but the current average is 25 head of stock. Since Wawona is less crowded than Yosemite Valley, this area has the potential for fewer conflicts between stock and other trail users. Please see the response to Concern 472 for a discussion of brown-headed cowbirds.

Commercial Operations—Bicycling

Concern 483: The NPS should retain commercial bicycle rentals because it is an environmentally superior alternative to automobile transportation.

> *Please retain the bicycle rental option at Yosemite! Biking is a green, environmentally-friendly activity that will reduce vehicle exhaust in the valley. It is also a wonderful way to see the valley, bringing visitors closer to nature.*
>
> (Individual; Correspondence #14)
>
> *I support any plan that would reduce automobile traffic in the valley. If automobile traffic is discouraged enough it will encourage people to seek alternatives such as bicycles. Valley sites all the way from Bridalveil Falls to Curry Village and Yosemite Village are easily accessibly by bicycle, but it is unrealistic to expect everyone to bring their own bicycles.*
>
> *If the bicycle rental stands in Yosemite Village and Curry Village need to be moved for some reason, at least do it in a way that bicycle rentals are available close to one of the parking areas. People should be able to drive to somewhere in the valley, park the car for the whole day and instead explore the valley by bicycle. This would be much better for the environment than having people drive between the various sites.*
>
> (Individual; Correspondence #35)
>
> *Bikes has very limited polutions to the enviroment and provide a excellent excercise opportunity and visiting experience. I believe the bike rental should be expanded and the park should promote the use of "greener" ways to travel around the Valley.*
>
> (Individual; Correspondence #1376)

Response: The NPS has revised Alternative 5 (Preferred), and bicycle rentals will now remain available in Yosemite Valley, at locations outside the river corridor. Visitors remain welcome to bring bicycles into the park, and to ride on paved bike paths and roadways.

Concern 484: The NPS should retain commercial bicycle rentals because it can be difficult for visitors to transport bicycles into the park.

> *By not offering bikes for rent would potentially limit many who may not for one have a bike of their own or may not have the means to bring their bikes.*
>
> (Individual; Correspondence #164)
>
> *Finally, I wonder to what extent the absence of bike rental in the Valley would discourage the use of public transit to get to Yosemite. If I really want to bike in the Valley, the proposed change strongly would strongly incent me to drive there, as transporting a bike on a bus is quite a hassle. Perhaps not many people use public transit to get to Yosemite, but still it seems ironic to making changes that decrease the desirability of making use of public transit.*
>
> (Individual; Correspondence #746)
>
> *Blithely saying that visitors can bring their own bikes implies that everyone owns a bike, rack and car to transport them. We do not. Many city dwellers go to Yosemite to discover such things for the very first time.*
>
> (Individual; Correspondence #1220)

I recognize that the plan will still allow for the use of personal bicycles in the park, but not everyone has the means of transporting enough bikes for their family up.

(Individual; Correspondence #1221)

eliminating bicycle rentals in the park means that individuals arriving on buses, who often are the least wealthy of the visitors, will not longer be able to ride bicycles in the park. Only those individuals driving into the park with a means to bring in personal bikes will be ALLOWED to ride.

(Individual; Correspondence #1281)

While it is of course possible that some bicycling will continue due to campers and others bringing their personal bikes, people with limited-size vehicles will need to make choices regarding what they can fit in their cars, and many will not be able to fit bikes, so if there are no bike rentals available then they will no longer have a bicycling option.

(Individual; Correspondence #1960)

Response: Please see the response to Concern 483.

Concern 485: The NPS should provide bicycles free of charge for visitors as an alternative to having a bike rental facility.

Consider free bikes for use in the Valley. Just take a bike and park at your destination. Pick up another to return to your car or campsite. Theft? Not too likely as these would be the "old fashioned fat tire" bikes. Also, a car would need an empty bike rack to steal a bike. Or the bikes could have a theft monitoring device. You'll be able to purchase the bikes with the income from parking tickets!

(Individual; Correspondence #94)

You should be encouraging folks to bike around. Have free bikes that people can use to get around as in Amsterdam and Google plex in Mountain View CA.

(Individual; Correspondence #1204)

Please, please, do not remove the bicycle rental service. In fact, the program should be increased. I would recommend making access to bicycles free to all paying visitors!

(Individual; Correspondence #1221)

I am in favor of making bicycles free and available for all in order to encourage non-motorized enjoyment, great family exercise and reduce pollution. I support removing the bike rentals, but add free bike caches around the Park.

(Individual; Correspondence #2148)

Response: Free bicycle programs have been tested in cities. These programs require dedicated funds for bicycle acquisition, administration and maintenance. The park concessioner currently maintains a fleet of approximately 300 bicycles, whereas 7,000 to 10,000 vehicles circulate around Yosemite Valley each day in peak season. The NPS is currently providing an efficient free shuttle service funded by other revenue collected by the concessioner, and does not see that the added expense of a free bike program is warranted for the relatively small transportation demand management benefit that such a program would provide. (For example, riders using the entire existing bicycle fleet can also be transported by 8 trips on 39-passenger busses.)

Concern 486: The NPS should replace the bicycle rentals with a low-cost bike-share program consisting of a large bicycle fleet dispersed at kiosks throughout Yosemite Valley.

Replace the current bike rental with a state of the art bike sharing program throughout the east end of the valley

(Individual; Correspondence #1674)

We [League of American Bicyclists] also highly recommend the installation of a robust, sizable bike sharing program as a relatively inexpensive, highly flexible and very popular low-impact transportation solution - that also happens to be healthy and fun.

(Individual; Correspondence #1838)

The plan seems to suggest replacing bike rentals at the current location with a mobile trailer of some sort. Instead, I'd like to suggest an alternative based on an program being started in the area I live in (a bit south of San Francisco) similar to ones in some European cities. It consists of a "bike sharing" arrangement where bikes are kept at kiosks at various points in an area, with minimal cost rentals (or zero cost, but with a yearly access fee) for short trips. The idea is to provide attractive alternatives to driving. A bicycle is effectively rented for each one-way trip, which increases utilization of each bicycle, thus reducing the total number needed. The emphasis is on using bicycles for transportation, not as exercise machines or for recreation.

(Individual; Correspondence #2195)

Perhaps an alternative plan would be to greatly reduce the cost of renting bicycles in the Valley - say cutting the price in half, and then increasing the fleet of bicycles available for rent. That would only improve visitor experience, reduce traffic, and reduce impact on the river.

(Individual; Correspondence #2439)

Response: The NPS will install self-help bike rental kiosks that would be located outside the river corridor and accessed by credit card payments or cell phones. Bikes could be picked up at and returned to the same stations, or returned to an alternative location. Bike rentals must continue to allow the concessioner a reasonable profit, as mandated by NPS concessions management policy.

Concern 487: The NPS should retain commercial bicycle rentals because it lessens traffic congestion.

I believe that the proposal to eliminate bike rentals in the Valley should be reconsidered. I'm a former employee of the concessionaire. I've seen the summer auto gridlock and I know that the buses aren't capable of handling all of the visitors. Rental bikes provide a convenient alternative to driving; one that doesn't contribute to the smog that hangs in the Valley every summer.

(Individual; Correspondence #56)

Eliminating bike rentals is especially counterproductive when reduction of motor vehicle traffic in the Valley is a worthy and longstanding goal. The size of the Valley requires some mode of transportation other than walking if the average visitor wishes to visit various locations in a single day. Bike riding is especially conducive to a leisurely tour of the Valley for most visitors. Eliminating bike rentals will increase motor vehicle traffic.

(Individual; Correspondence #1045)

During the peak visitation period, the traffic in the Valley gets so congested. I would think that the Park Service would want to encourage visitors to get out of their cars and enjoy the outdoor experience. One way to do that is on a bicycle. It is a wonderful way to see the sites, enjoy the fresh air, and get a little exercise. Not everyone packs their bicycle when they visit Yosemite. If you eliminate the bike rentals, people will no longer have access to a bicycle to use as an alternative transportation method. This decision would likely result in an increased usage of automobiles in the Valley.... more traffic, more congestion, more pollution.

(Individual; Correspondence #1074)

If you want to reduce car traffic, then it seems a good idea to keep the bike stands. We transport our bikes from home and only use cars sparingly when we are in the park, but other people may not be able to bring their own bikes. It takes a lot of cars off the road to have people bike around.

(Individual; Correspondence #1096)

The preferred alternative that increases parking by 5% yet eliminates on site bike rentals is counter productive to reducing congestion in the park. Bicycles should viewed as the 3rd mode of transportation in the park, an alternative to full parking lots and crowded shuttle buses.

(Individual; Correspondence #1674)

Response: Please see response to Concern 483.

Concern 488: The NPS should relocate the commercial bicycle rental to a different area, rather than eliminating it entirely.

I do agree with most people though that relocating the bike rentals rather than completely eliminating them from Curry Village seems like a nice idea. Bike rentals will help alleviate the congestion from drivers and is a great form of exercise. Please consider relocating the second bike stand (maybe to Yosemite Village).

(Individual; Correspondence #248)

I do think that maintaining some bike rental option within Yosemite Valley would be a good thing. A Bike ride is a wondeful, healthful way to enjoy the Valley without adding to vehicle traffic. Perhaps some single. modest-sized, central bike rental concession near the Lodge could be accomodated.

(Individual; Correspondence #1161)

The bike stand could be moved to the area near the reservation office where, incidentally, it was many years ago.

(Individual; Correspondence #2029)

If you have to remove bike rentals, replace them with a better bike rental facility.

(Individual; Correspondence #2214)

I am against the removal of bike rentals for several reasons. Not all people can bring their own bikes to the park, bikes are a good way to get around the park without using a car so there is less traffic, and bike use also reduces crowding on shuttles. Options to the location of the current bike rentals could be to have rental kiosks at the day use parking areas at Camp 6 and Yosemite Lodge and/or at the current Village Sports Shop.

(Individual; Correspondence #2460)

Response: Please see the response to Concern 483.

Concern 489: The NPS should retain commercial bicycle rentals because they are a convenient family activity.

I do not want to see the bike rental places closed at either the Lodge or Camp Curry...With the limits on driving in the park and the overcrowded buses that don't go everywhere, the bikes are the best way for us to get around easily with our family.

(Individual; Correspondence #1166)

Biking the trails is a wonderful way to see Yosemite without having to use either the overcrowded buses or driving their vehicle. It allows families to experience the valley together.

(Individual; Correspondence #1191)

Response: Please see the response to Concern 483.

Concern 490: The NPS should retain commercial bicycle rentals because bike rentals offered by a concessioner and managed by the park is a superior alternative to using and transporting private bicycles.

By removing Bike rental from the valley, you may reduce the overall number of bikes in the park, But you will see an increase in the number of private bikes in the park. Rental Bikes are returned to the rental location private bikes will need to be stored somewhere in the park. This will result in more bikes being locked up to rails, post and trees.

(Individual; Correspondence #1424)

Bikes don't hurt anyone or anything.If we remove the rental, people will bring bikes that are potentially not ideal for mountain terrain and may pose a hazard. The increase of people bringing bikes to the park may pose a greater risk of vehicular accidents by inexperienced drivers lashing bike's to their cars.

(Individual; Correspondence #2535)

The removing of the Curry Village raft rental, store and bike rental stand would make it less inviting for families who want to enjoy those outdoor activities. Removing these would also cause people bring their own items instead, adding potential risks like inadequate equipment and increased travel loads on non-commercial vehicles.

(Individual; Correspondence #2551)

Response: Please see response to Concern 483.

Concern 491: The NPS should retain commercial bicycle rental because they provide access and recreational opportunities to the elderly and visitors who are physically challenged.

The bicycling [rental] is another opportunity for seniors to be able to enjoy the park.

(Individual; Correspondence #77)

Biking in YNP is the best way to see the park. It is a quick way to get from our "home base" of the Lodge, we don't have to wait for the buses, it's great exercise, leaves no carbon footprint. Eliminating bike rentals in the park would do what? As a disabled person (two back surgeries) I have a hard time walking distances greater than a half mile, but I can bike almost anywhere in the park, including up to the Mirror Lake.

(Individual; Correspondence #1036)

Response: Please see response to Concern 483.

Concern 492: The NPS should retain the bicycle rental and consider improvements, such as automated rentals or long-term rentals.

Something that I feel is completely missing from the plan for the Yosemite Valley is building in extra support for the use of bicycles. Currently bicycle rental is limited to the hours during which the General Store is open. During the summer months, this is inadequate for visitors that arrive at first light. Similarly, the closing time impacts the enjoyment of the full summer day if a bicycle is rented for just the day. Consideration should be given as to how to provide 24x7 bicycle rental that does not require attendance of a staff member to complete the sale; automatic locks and credit cards would seem a likely part of the answer.

(Individual; Correspondence #44)

The NPS should be doing everything it possibly can to get more people on bikes in the Valley and get them out of cars. That includes providing short- and long-term bike rentals in the Valley.

(Individual; Correspondence #1334)

Response: Please see response to Concern 486.

Concern 493: The NPS should evaluate safety impacts of the bicycle rental program due to increased bicycle conflicts with pedestrians and vehicles.

> *The proliferation of bikes, largely exacerbated by a robust rental program, has led to increased pedestrian/bicycle conflicts, a perceived need for more multi-use asphalt trails, vehicle/bicycle conflicts, off-trail resource damage, and more. ... All too frequently, bike renters haven't ridden a bike in years coupled with rental equipment they're not used to; this poses an additional safety risk when sharing a narrow bike path with pedestrians. ... And though there's been mention of the possibility of relocating bike rental facilities outside the Merced River Corridor, the radiating impacts generated by such a facility need to be considered.*
>
> (Individual; Correspondence #1618)

Response: Bicycle safety is an operational health and safety issue. Bicycle rental service has been provided by the concessioner for approximately 50 years. The park has not experienced bicycle accidents, injuries, or deaths at a higher rate than cities throughout California.

Concern 494: The NPS should replace the centralized bike rental facility with kiosks dispersed throughout the campgrounds and major visitor activity nodes in Yosemite Valley.

> *In Yosemite Valley, this might work with kiosks conveniently located in campgrounds and at Yosemite Lodge, Yosemite Village, Curry Village, etc. If someone forgot to buy a small item needed for dinner, for example, the round trip time using the shuttle buses, including walking to a bus stop and waiting for a bus, is long enough that most people will drive instead. Given the short distances, a bicycle would allow such a trip to be made in an acceptable amount of time - a few minutes each way.*
>
> (Individual; Correspondence #2195)

Response: Please see the response to Concern 486.

Concern 495: The NPS should retain ADA bicycle rentals to meet accessibility guidelines for recreation on federal lands.

> *Providing handicap bike rentals also meets accessibility requirements for NPS. The US Access Board recently issued accessibility guidelines for recreation on federal lands. Many of Yosemite's paved trails already meet the regulations outlined in these*
>
> *guidelines; however, removing the opportunity to rent a handicap bicycle will negatively*
>
> *impact the visitor and will hinder any progress the NPS strives to make towards meeting accessibility goals.*
>
> (Business; Correspondence #2818)

Response: The final Merced River Plan has been revised to state that bicycle rentals will be provided in Yosemite Valley, in locations that are situated outside the river corridor but otherwise linked to the bike path system. New rental stands or kiosks would be designed and installed as fully-accessible facilities according to all federal standards.

Concern 496: The NPS should retain the Yosemite Lodge bike rental stand in its current location because it is located such a small distance within the river corridor and has no adverse impacts on river values.

> *We understand that the NPS has heard considerable criticism from the public during the comment period regarding the decision to eliminate bike rentals and is considering relocating the rental locations outside the river corridor. We believe that the NPS should allow bike rentals and support this reconsideration. However, we question whether relocating the rental operation outside the river corridor is necessary or appropriate. For example, the bike rental location at Yosemite Lodge is only 75 feet inside the river corridor. Is a relocation of 75 feet necessary if this service is slated to continue?*

There is no data that ties the current location of the bike rental operations at either Curry Village or Yosemite Lodge to any adverse impacts to the environment, to the river or to river values. Moving them outside the river corridor does not improve environmental conditions, nor seem practical.

(Business; Correspondence #2818)

Moving the commercial bike rental office at Yosemite Lodge 75 feet to get it out of the W&S corridor to make it "legal" has been mentioned as a compromise by NPS staff in MRP DEIS meetings. There appears to be no possible justification as to why that facility damges the river values in its current location but not 75 feet away!

(County Government; Correspondence #2956)

Response: NPS evaluated all existing and proposed public use facilities (including commercial recreational services) located within the river corridor using a rigorous three-step process. In accordance with WSRA, this process evaluated all facilities to determine whether it would be: (1) feasible to relocate the facility outside the river corridor, (2) if infeasible to relocate, if the facility was necessary for public use and/or resource protection, and (3) if the facility is both infeasible to relocate and necessary for public use or resource protection, whether it can be maintained without adverse impacts to river values. In the case of bicycle rentals, it was determined that these are feasible to relocate outside the river corridor. Bicycle rentals will remain available in Yosemite Valley, but at locations outside the river corridor. Visitors remain welcome to bring bicycles into the park, and to ride on paved bike paths and roadways.

Commercial Operations—Rafting

Concern 497: The NPS should retain raft rentals because this activity results in minimal impacts to the river.

The rafting occurs in such a small section of the river, and has such a short duration during the summer, it's hard to really believe that eliminating the rafting will lead to much of an impact on the river quality. The majority of the river is not subject to the impacts of rafting.

(Individual; Correspondence #48)

The raft rental operation at Curry Village should be kept, it is enjoyed by thousands of visitors and has minimal impacts on the environment. There are limited places to beach a raft along the river anyway and only a short section can even be rafted which reduces impacts to riparian vegetation. Taking away this activity would greatly reduce the enjoyment that many experience every year at the park.

(Individual; Correspondence #2637)

Response: The NPS has reconsidered the removal of commercial raft rentals and has amended Alternative 5 (Preferred) to reflect this change. Commercial raft rentals will be provided in Segment 2A (East Yosemite Valley) at 100 boats per day. This is about half of the amount that is currently allowed for commercial boating. For additional details on this operation please see the description of alternatives in “Alternatives” (Chapter 8) and “Boating Opportunities” (Appendix R).

Concern 498: The NPS should limit the number of rafts to reduce crowding on the river and scenic impacts.

I believe that the rafts should go, they do harm the river banks and the rafts take away from beauty of the purity of the river. I have seen "raft traffic jams" on the river

(Individual; Correspondence #900)

I do believe the raft rentals should be closed because the river gets too crowded with boats.

(Individual; Correspondence #1369)

Response: Alternative 5 (Preferred) of the final Merced River Plan/EIS does limit the number of vessels permitted on the river, and sets a capacity for both private and commercial boating. Private use will remain about the same as existing conditions, but commercial use will be reduced to about half what is currently allowed. See Appendix R: Boating Opportunities for more information.

Concern 499: The NPS should relocate the raft rental facility rather than eliminating the service.

> *I'm not sure why we're getting rid of raft rentals and restricting floating to 100 people per day if one of the recreational values is floating on the river. ... Why not just move the raft rental facility somewhere else then?*
>
> (Individual; Correspondence #13)
>
> *Taking away and removing completely the Curry Village raft rental would deny many common folks like me and my family, who enjoy a different way appreciating the Yosemite Valley through strolling down the river.*
>
> *I would highly recommend "relocating" the raft rental rather than completely removing it.*
>
> (Individual; Correspondence #1004)

Response: The NPS has reconsidered the removal of commercial raft rentals and has amended Alternative 5 (Preferred) to reflect this change. Commercial raft rentals will be provided in Segment 2A (East Yosemite Valley) at 50 boats at one time (about 100 boats per day) and boat storage will be relocated to another facility outside of the corridor (though a temporary mobile operation may be used near the put-in for the short rafting season). This would reduce use to about half of the current commercial boating capacity while still providing the activity and reducing the development footprint associated with raft rentals. For additional details on this operation please see the description of alternatives in "Alternatives" (Chapter 8) and "Boating Opportunities" (Appendix R).

Concern 500: The NPS should retain raft rentals because management of rafting through a concessioner provides greater opportunity for visitor education and river stewardship than unmanaged private use.

> *Removing raft rentals takes away trained eyes and ears on the river. When the river is low and only guests with rafts can float there is more trash and unauthorized use. When the concessionaire is on the river, especially during higher flow times they clean up the river as well as monitor take-outs and put-ins. Having the concessionaire staff on the river is beneficial. A lower level of commercial boats (75) may be ok if this lessens impact on the river. (and permitting noncommercial boats)*
>
> (Individual; Correspondence #95)
>
> *I would also like to comment on your plan to remove rafting and swimming pools from the Valley. While I can understand why rafting may lead to riverbank erosion, I think its important to note that having a commercial service on the river regulates all users of the river. Rafting services are a way to help people negotiate the river safely and keeps people to designated areas, rather than tearing up the entire corridor.*
>
> (Individual; Correspondence #2439)
>
> *The [raft] rental program benefits Yosemite's visitors and minimizes environmental impacts because of the management of the operation. Raft rentals are permitted on a three-mile stretch of the Merced River and are only operated during safe river conditions. All participants are provided life vests and are given a safety talk and river orientation prior to their trip. We provide designated put in and pull out sites that include trash pickup and shuttle service. We provide monitors at various locations along the river to enhance visitor safety. Without that support, the river would be closed to all rafters far more frequently. ... We understand that site specific environmental impacts occur at the rafting put in and*

pull out areas; however, we support regular restoration efforts in these areas and would support infrastructural improvements that may protect river values. ... These benefits were all recognized in the 2011 Boating Study conducted by NPS. ... The pull out location at the end of the established boating zone in Yosemite Valley is very clearly marked for all floaters and concessioner staff is available to advise boaters to come to shore and to assist visitors ending their float. Restrooms and trash receptacles are provided and serviced by the concessioner at this location. The raft rental's shuttle system, which is available to private rafters for a nominal fee, reduces vehicle congestion on the Valley floor roads and provides a safe means of transportation during the return trip back to the rental operation.

(Business; Correspondence #2818)

Commercial rafting conclusions are misleading. While rafting is not prohibited, it is reduced by over 75% from a level that your own studies have shown is very acceptable. With 60-66% of the river rafters using rental rafts, a dramatic injustice will be felt by eliminating this recreational opportunity. By forcing controlled put-in and take-out, and providing return shuttle service, the rental user can be easily managed to eliminate any stream bank damage, while the private user, even with a mandatory permit, will be far less controlled.

(County Government; Correspondence #2956)

Response: Please see response to Concern 499.

Concern 501: The NPS should maintain commercial rafting because it lessens traffic congestion.

If commercial rafting is not allowed, how will the permit system be enforced? Will the lack of commercial rafting increase vehicular traffic because multiple private vehicles will have to go to the take out areas to retrieve the rafts and the people that used them instead of the commercial system where shuttles are used?

(Individual; Correspondence #2460)

The raft rental operation at Curry Village should be kept, it is enjoyed by thousands of visitors. . .Additionally, without the support of Curry's natural gas mass transportation that picks up rafters down river, individuals with private watercraft may need to park vehicles at both ends, increasing vehicle impacts to the Valley.

(Individual; Correspondence #2637)

Response: Please see response to Concern 499.

Concern 502: The NPS should limit rafting because this activity causes impacts to the riparian environment.

Over the years, I've been on many wild and scenic river systems including the American, Kings, Tuolomne, Kern and Truckee, as well as others outside of California. While I have a great appreciation for what the Merced has to offer, there are many other places one can go for a river experience, but the Yosemite Valley is unique, as everyone knows. I cannot understand why the proposals would allow the public to use rafts, kayaks, inner tubes and other floatation devices on the Merced as it flows through the Valley, but remove the other recreational services above which would have little, if any, direct impact on the riparian zone around the Merced.

(Individual; Correspondence #68)

Limiting the rafting might be a good idea, there seems to be a lot of trash alongside the river banks and in the river not to mention the damage to the meadows and the riverbank.

(Individual; Correspondence #70)

Paddling: ... commercial boating prohibited.

(Individual; Correspondence #3325)

Response: Currently, NPS does not have conclusive evidence that links rafting use levels to adverse impacts to the riparian zone, although there are site-specific impacts at the put-in and take-out locations that are to be addressed in Alternatives 2-6. Impacts to other riparian areas could be the result of commercial rafting users, private boaters, or by other visitors looking for river access. By setting a capacity for private boaters and reducing the number of commercial rafts on the river, it will allow the park to continue developing boating use data and use-impact relationships, extending research from the 2011 river study over the long term. The information will allow estimates of "at one time" and total daily boating use by both private and commercial users, which can be compared to 2011 river use and evaluations of boating densities. If the NPS documents impacts to riparian areas that are the result of boating use, boating capacities may be reduced while protective measures and restoration are implemented. The proposed capacity for Segment 2A (East Valley) and Segment 2B (West Valley) reduces total boating use on peak use days. This is accomplished through reductions in commercial use (about 50% fewer boats per day) and holding private use near existing average use levels. This will reduce the number of boats in viewsheds and reduce congestion at launch areas and higher-use beaches, providing a lower-density experience for boaters and shore users. This will also reduce the commercial rafting development footprint. The commercial boating put-in will also be relocated to a less ecologically sensitive area. See Appendix R (Boating Opportunities) for more information on boating capacities and River Values and their Management (Chapter 5) for strategies employed by the NPS to both monitor and maintain riparian areas in Yosemite Valley.

Concern 503: The NPS should retain raft rentals because some visitors do not own their own rafting equipment, or are unable to transport equipment to the park.

> *By limiting rafting, for example, to people who bring their own rafts you exclude all people who don't have or can't afford rafts. You also risk filling the river with rafts that may not be suitable, or rafts that will get stuck or cause congestion - and with no one on site responsible for those rafts, those problems will be even worse.*
>
> (Individual; Correspondence #832)
>
> *Sure, people can bring their own rafts...the concession allows for people who forgot (or who didn't know about) the river experience a way to do it. For example, there are a lot of international visitors to the Park who don't have a raft.*
>
> (Individual; Correspondence #1468)

Response: Please see the response to Concern 499.

Concern 504: The NPS should retain rafting because this is an accessible recreation opportunity for the elderly, children, and physically challenged visitors.

> *As a person with a disability, I am so disappointed to learn that the raft rental and especially the Yosemetee Lodge Pool might be in jeopardy. I have a balance issue and cannot manuvere most of the hikes, but am so happy to enjoy the river and pool while my family hikes. I look foreward every year to my serenity on the water in Yosemitee, and feel so saddened that I will not be able to do these things.*
>
> (Individual; Correspondence #938)

Response: Please see the response to Concern 499.

Concern 505: The NPS should retain raft rentals because it is an alternative to private rafting that is safer and can be well-regulated.

> *Raft rentals: Well, I like to bring our own flotation devices; but, the rafts are a lot stronger and more durable and do maker the kids feel safer, I think.*
>
> (Individual; Correspondence #7)

Eliminating raft rentals where visitors can obtain a safe raft, with life jackets and a shuttle service will increase the likelihood visitors will use crude floating devices without life jackets and will either use their vehicles for shuttles or crowd the free shuttle service. They will also not be as well regulated and will require additional ranger services to patrol for wrong doings along the river corridor.

(Individual; Correspondence #1690)

Additionally the idea that people could provide their own whitewater equipment is foolish. The end result is that you'd have more people on the river with inadequate or the wrong equipment. The park service would probably spend more money rescuing people then they do know.

(Individual; Correspondence #1850)

I believe that the raft rental provides the safest way to monitor visitors on the river. You retain control of the quality of the rafts and can instruct visitors on water safety. I believe without the rental station you will see more people using poor quality equipment and endangering themselves.

(Individual; Correspondence #2192)

As for rafting ...without rafts available from the rental shop (which also supplies floatation devises and a quick training on raft safety) park visitors will bring unsafe rafts, tubes etc into the park and be at higher risk of injury and/or death from drowning.

(Individual; Correspondence #2418)

Response: Please see the response to Concern 499.

Concern 506: The NPS should retain private and commercial rafting because the NPS 2011 Boating Study indicates the public does not want to see this activity eliminated.

A survey conducted by Confluence Research and Consulting in July 2012 clearly indicated that the public, 86 percent of those surveyed, do not want to see raft rentals eliminated. The Board, therefore, opposes the removal of commercial bike and raft rentals.

(Individual; Correspondence #1984)

... the 2011 Boating Study found that 80% of participants would not support the removal of raft rentals in Yosemite. This is apparently an unusually high level of support, because the surveyors included the comment, "This level of opposition is rare for recreation surveys." Further, only 9% of those surveyed indicated that they observed a circumstance where they believed the use level justified a reduction. The NPS proposal to reduce the number of rafts from 350 to 100 would apparently marginally improve the experience for 9% of the rafters, who may not even be among the 100 rafts allowed on the river on any given day. The result would be the total elimination of the experience for 800 people (100% of the rental rafts and about 50 private rafts) each day for the possible benefit of 18 people. These calculations are based on information in the rafting study that indicates that private rafts have 2 people per raft and rental rafts have 3.3. Eliminating 100% of the experience on a daily basis for 800 people to potentially benefit eighteen in a manner that is not quantified does not support an "improved visitor experience." For these reasons, we believe the NPS should reconsider the removal of these visitor services since there is no apparent environmental benefit, it is not required by WSRA and the public greatly values the service that is being provided.

(Business; Correspondence #2818)

The elimination of raft rentals and the implementation of a permit system limiting the activity to 100 rafts per day drastically reduces access to this recreational experience. We also are concerned that it will prove to be extremely difficult to implement and enforce in a way that is consistent with the current informal manner in which visitors interact with the river. DNC currently offers more than 200 raft trips per day (no more than 100 on the river at one time) and, according to the NPS study, the estimated use from all sources is 350 rafts per day. Reducing access to only 100 rafts per day will be a significant reduction.

(Business; Correspondence #2818)

The results of the 2011 Boating Study have been disregarded in the decision to eliminate the service. As noted above, few people who were surveyed believed the number of rafts should be reduced and 80% of those surveyed, whether boaters or not, believed that raft rentals should be retained

(Business; Correspondence #2818)

Response: Alternative 5 (Preferred) in the FEIS has been revised to keep some level of commercial rafting. However, setting a capacity for private boating and reducing the amount of commercial boating will reduce the development footprint associated with this kind of use, and will ensure that total boating use levels do not exceed acceptable levels. Appendix R: Boating Opportunities provides more information about how commercial rafting will be managed to allow this activity while minimizing its impacts.

Concern 507: The NPS should retain rafting as a commercial recreation opportunity because eliminating dispersed activities will concentrate use in other areas where there is already perceived crowding.

Eliminating the raft rentals at curry village seems to be another idea that will eliminate revenue and access to parts of the park that are not viewed in other ways. ... My concern is that by limiting access to the river the trails will become more crowded and unsafe. The mist trail is already filled with inexperienced hikers who make it dangerous for others and by pushing them out of the river on to the trails they will be more crowded and dangerous. Other areas such as Mirror Lake and the run off area of Lower Falls will also become crowded with people playing in the water.

(Individual; Correspondence #93)

Response: Please see the response to Concern 506.

Concern 508: The NPS should explore additional management actions to reduce impacts associated with rafting.

Rafting: Build a ramp in order to keep the foot print in only one place. Same for loading rafts onto cars and buses.

(Individual; Correspondence #1433)

The only places that obviously got much wear and tear was the place we put in and took out. Couldn't those places be changed regularly, so no one spot got too much wear? Or would there be a way to limit the number of rafts used at once? Or would it help to not allow stopping along the way?

(Individual; Correspondence #2235)

The Draft Plan bans boating through the Merced Gorge due to safety concerns. Banning boating is a highly unusual management tool–both for National Parks and on Wild and Scenic Rivers across the country. Visitors interested in boating this run will be technically skilled and highly experienced. Safety on technically challenging whitewater is managed consistently across many federally managed rivers with some simple management actions. They include:

- *Requiring a mandatory permit for river use;*
- *Requiring mandatory equipment: personal floatation device, helmet, and a boat and paddle designed specifically for river travel;*
- *Providing education on the conditions to be expected on the water.*

Paddling prohibitions or use limits are not used to manage river safety on any other river we are aware of in the United States. The management tools listed above serve river managers well across the country, and we encourage the Park to employ them to address safety concerns in the Merced Gorge. Should user capacity be a concern, it will naturally be limited by technical challenge and seasonality of boatable flows, and boaters will be subject to the availability of parking spaces as any other visitor to the area. Providing a designated put-in will address management concerns regarding bank trampling and erosion.

(Individual; Correspondence #2611)

Response: Please see the response to Concern 502. Also, other management actions to address impacts and safety concerns include relocating the commercial boating put-in to a more resilient area, requiring mandatory safety equipment on certain stretches of river, and permitting private boating via self-registration, wilderness permits, or other mechanisms. Please see Appendix R: Boating Opportunities for more information.

Visitor Use—Floating/Rafting/Watercraft

Concern 509: The NPS should open all segments of the Merced River to boating because it provides a visitor experience consistent with the mission of the National Park Service and the Wild and Scenic Rivers Act.

> *I am writing to express support for opening ALL segments of the Wild and Scenic Merced and Tuolumne Rivers to boating. Whitewater kayaking, canoeing and rafting is a great way for visitors to experience the immense natural beauties the park has to offer, and is form of recreation in the park that is consistent with the mission statement of the United States National Park Service.*
>
> (Individual; Correspondence #218)
>
> *Boating is a low-impact and Wilderness-compliant way to experience the beauty of Yosemite National Park. In addition to the fact that banning boating on a Wild and Scenic River is inconsistent with the Wild and Scenic Rivers Act, boaters should be allowed the freedom to choose whether or not to experience all of the Merced and Tuolumne Rivers given their skills and abilities.*
>
> (Individual; Correspondence #314)
>
> *The Wild and Scenic Rivers Act states that recreational uses of rivers should be allowed, so long as uses do not degrade river values. However, the only stated reason to disallow paddling on the Merced gorge is concern for the safety of would-be rescuers in hypothetical accidents. While this concern is understandable, it does not constitute a reason to disallow floating on a Wild and Scenic River.*
>
> (Individual; Correspondence #1965)

Response: In Alternative 5 (Preferred) all segments of river, including Wilderness and highly technical reaches, are opened to private boaters. For additional information on capacities, open reaches, and management of boating in each segment please see Appendix R: Boating Opportunities.

Concern 510: The NPS should limit boating on portions of the Merced River because this activity impacts riparian vegetation and detracts from visitor experience and scenic quality.

> *The limits on boats on portions Merced River and the Tuolumne provide an opportunity for others to experience the area without constant interruption by floaters in their conspicuous day-glow gear.*
>
> *I would support expanding limitations on boating throughout all of Mercedes, there are presently numerous other creeks outside the park and WSRs which offer unlimited amounts of floating. During lower flows boats leave brightly colored residue on the rocks on the streambed that only detract from the beauty of the Rivers, the cumulative impacts from these marks and residue is not included in the Draft. Boats also require portage and scouting tails near most rapids where there is a visible deterioration of the streamside vegetation and increased sedimentation.*
>
> (Individual; Correspondence #180)
>
> *Do not allow any boating on Segment 2 of the Merced River. Boating disturbs the natural setting and likely contributes to damage of the riparian areas.*
>
> (Individual; Correspondence #1287)
>
> *I wish to convey my opinion that boating/open paddling should not be allowed in beautiful Yosemite National Park. I am a Texan, living in California, and Yosemite is by far my favorite place in the state.*

To open the park to even more visitors would further erode the perfection that is Yosemite, and I respectfully urge you to maintain Yosemite's prohibition of boating.

(Individual; Correspondence #1843)

Response: There are specific boating-related riparian impact areas (e.g. Stoneman Bridge put-in) that will be addressed by specific restoration actions in the Merced River Plan/FEIS. At a segment-wide level, the 2011 river use research study showed that most rafters use beaches rather than steep banks or vegetated areas where impacts are more likely to occur. If necessary, biophysical impacts would be better addressed with focused education efforts targeting boaters. Some visitors may feel that the presence of boaters detracts from experiences or scenic quality, but data from the river use research study indicates that majorities of both shore and boating users do not support eliminating boating. Alternative 5 (Preferred), revised in the FEIS, includes management actions that will reduce commercial boating and may limit boating by time of day, season, and for different segments (see Boating Appendix R for more specific information). These capacities allow boaters to enjoy the scenery and immersive experiences along the river, while managing use levels so they are not intrusive to most other shore and boating users, and ensuring ORVs remain protected.

Concern 511: The NPS should allow boating between Sentinel Beach and Pohono Bridge.

As an Arizona resident and a Class IV+ paddler who enjoys experiencing wilderness and natural landscapes by river ... unfortunately, Alternatives 1-5 in the Merced River CMP/EIS continue the policy of banning boating between Sentinel Beach and Pohono Bridge on the Merced River. This reach has a low degree of difficulty and offers some of the most spectacular views in the Valley. ... Please reconsider your Preferred Alternatives for both plans and amend them so that the entire length of the Merced and Tuolomne Wild and Scenic Rivers are open to boating.

(Individual; Correspondence #123)

Response: Alternative 5 (Preferred,) in the Final Merced River Plan allows boating for 45 boats per day in River Segment 2b (Sentinel Beach to Pohono Bridge). Additional details can be found in Appendix R: Boating Opportunities.

Concern 512: The NPS should not prohibit rafting/kayaking due to safety considerations.

The Park's concern for public safety is commendable, however it is clearly at odds with other management practices. Rock climbing, for example, has obvious and significant risks, however the Park has been able to manage this activity effectively. The Park's approach to climbing safety is not to ensure safety to climbers by placing fixed lines on routes or even providing anchor equipment on all routes, and the climbing community embraces this. I do not understand why the Park thinks the kayak/raft community would expect that all risk would be mitigated by removing inherent dangers (i.e. wood in rivers) in the sport. ... I am very disappointed the Park Service has decided to single out river paddlers as the one user group that cannot navigate these inherent risks in the activity they choose to pursue.

(Individual; Correspondence #117)

[we support] placing reasonable limits on recreational use of river

corridors to ensure visitor capacities are not exceeded. A user capacity of zero aimed solely at paddling, however, is unacceptable. ... we feel it is a mistake for the Park Service to eliminate paddling based upon its own determination of the risk. ... Boaters should be allowed the freedom to choose whether or not to experience all of the Merced and Tuolumne

Rivers given their skills and abilities.

(Individual; Correspondence #263)

A standard argument against boating in parks like Yosemite is that it is not safe. The development of modern river craft and safety accessories, as well as the continuing advances in river skills make the safe transit of rivers like the Merced and Tuolumne Rivers more practical than thirty years ago.

(Recreational Group; Correspondence #302)

Yosemite National Park's proposed Wild and Scenic River Management Plan would ban paddling on several sections of the Merced and Tuolumne rivers because Park officials deem the activity too risky. ... Paddling, like all our activities, is a well-established form of recreation with a suite of skills and equipment aimed at mitigating and minimizing risks. The activity has developed in a manner that addresses the vast majority of subjective and objective hazards, regardless of the level of challenge. Simply put, very good paddlers with good gear can paddle very difficult rivers with relative ease and safety. ... We believe that Yosemite National Park should welcome these experiences rather than turn them away. ... See, for example ... the Merced

River Plan at pp. 8-37, 8-254, 8-296.

(Individual; Correspondence #488)

Response: The NPS is not prohibiting rafting/kayaking primarily for safety reasons, although it has evaluated capacities in light of this issue. For example, low capacities on extremely challenging reaches (e.g. Merced Gorge) help avoid congestion at scouting and portaging areas, which is likely to keep encounter rates low and improve boater safety.

Concern 513: The NPS should prohibit rafting/boating in sections of the river where engineered log jams are determined necessary.

I am very concerned about the elimination of the concessioner raft rental operation that is managed under contract to the government, combined with the creation of engineered log jams and allowing private vessels to be operated in the recreation section of the river in the core of Yosemite Valley. If engineered log jams are really necessary in that section of the river, prohibit all rafting/floating/tubing and swimming.

(Individual; Correspondence #2133)

Response: There are a number of issues that factor into management decision regarding engineered log jams and boating, including free flowing condition, the Riparian ORV, and safety. The purpose of the engineered log jams is to repair damage to river banks, improve the condition of the riparian zone, and mitigate continuing impacts from historic bridges. Engineered log jams are proposed between Sugar Pine Bridge and downstream of Stoneman Bridge, which overlaps with the proposed private boating zone. Boaters may be at risk from the engineered log jams, particularly at high flows. While visitors will be educated about such risk and use may be managed, Section 8.2.5.1 of NPS Management Policies (2006) states "Park visitors must assume a substantial degree of risk and responsibility for their own safety when visiting areas that are managed and maintained as natural, cultural, or recreational environments".

Concern 514: The NPS should designate appropriate put-in and take-out areas, and provide clear signage of where and when rafting is permissible on the Merced River.

Areas should be designated and published where guests can put in and take out various flotation devices. If, because of high water, those areas are off limits they should be posted. When they are safe, the signs should be taken down.

(Individual; Correspondence #2387)

If commercial rafting is not maintained it should still be allowed and in either case signage should definitely be improved to clearly mark where rafting is allowed or prohibited.

(Individual; Correspondence #2411)

Response: The NPS will provide appropriate river access points as a key strategy to protect and enhance riparian areas. "Alternatives" (Chapter 8) provides information on the open stretches of river for boating by alternative and "Boating Opportunities" (Appendix R) provides additional detail for the preferred alternative. Ultimately, opening new stretches of river to boating will require changing the Superintendent's Compendium. When these changes are made to the compendium, the park will provide guidance for the public on allowable reaches, acceptable access points, permitting mechanisms (where they exist), as well as safety considerations.

Concern 515: The NPS should not institute a permit program for rafting on the Merced River because it is an unnecessary burden on visitors and will negatively impact visitor experience.

> *The visitors themselves voluntarily reduce the impacts as opposed to the Park issuing more restrictions'for example, the premature restriction in the proposed alternative that will force visitors who bring their own rafts/tubes to now have to obtain a permit; rather than jump into such a requirement that will require extra staff time and expense, why can't the park adopt a 'wait and see' attitude to evaluate whether the lack of rental opportunities will result in visitors self-selecting participation*
>
> (Individual; Correspondence #1618)
>
> *We believe the permit system will be an unnecessary burden to the public and have a negative impact on the quality of the visitor experience. Will campers who bring blow up floatation devices for their children be required to get a permit to spend the afternoon at the river? How will the permits be issued? Is there a fee for the reservation and can they be reserved for more than one day or secured in advance? How does the NPS propose to enforce the permit system? These issues are relevant in determining if the proposed solution is too intrusive to what is described as a relaxing and meaningful experience the way it is currently enjoyed.*
>
> (Business; Correspondence #2818)
>
> *Encourage and allow personal watercraft to the maximum extent possible WITHOUT PERMITS! Rafting in itself is an ORV. It will self-regulate and it does not create concentrated degradation as does concessions rafting. Plus, there will not be the need for diesel buses to circulate the Valley to pick rafters. There will not be the need for two rafting diesel bus depots to ferry the rafters from down-river to up-river locations. Can't the CNG shuttle buses provide this service for private rafters who carry small rafts? . . . Infrastructure support to maintain this activity would be eliminated such as raft repair, bus repair, personnel support, etc. The pool type ropes can be removed from the banks of the river too. This would maintain a safer and more pleasurable river environment, lessening the crowds in the river and less haul-out damage to riverbanks. By scooting a few fallen trees aside parallel to the flow of the river, this can and will facilitate safer rafting as well as enhance the resources of the park and the ORV's, which we have requested for decades.*
>
> (Individual; Correspondence #7820)

Response: As with other visitor uses, the MRP considers capacities for boating on different river segments to provide different types of high-quality recreation opportunities. When they are used, permits are a way to enforce capacities, and monitor amounts, types, and locations of use. NPS will carefully consider when permits are necessary, and work to find ways to issue permits that are reasonably convenient for visitors and efficient to administer (for example, permits for backcountry segments could be handled through the same mechanisms as current backcountry hiking permits). The revised Alternative 5 (Preferred) in the FEIS envisions permits will be required for segments in Wilderness only. However, the NPS will consider implementing permits on other segments in the future should use regularly exceed capacity on these segments. Commercial rafting will be decreased from current levels, along with other management actions

to address access, congestion, restoration, and development footprint issues. Appendix R: Boating Opportunities provides more details.

Concern 516: The NPS should provide the definition of a boating craft and additional details about the management and implementation of the boating permit system.

> *We believe the permit system will be an unnecessary burden to the public and have a negative impact on the quality of the visitor experience. Will campers who bring blow up floatation devices for their children be required to get a permit to spend the afternoon at the river? How will the permits be issued? Is there a fee for the reservation and can they be reserved for more than one day or secured in advance? How does the NPS propose to enforce the permit system? These issues are relevant in determining if the proposed solution is too intrusive to what is described as a relaxing and meaningful experience the way it is currently enjoyed.*
>
> (Business; Correspondence #2818)

Response: The Merced River Plan/FEIS provides additional information about boating craft definitions (which may be permitted in the future) and how those users differ from swimmers using water toys on short reaches of the river in the Stoneman to Sentinel Beach segment (see Appendix R: Boating Opportunities). Alternative 5 (Preferred) no longer proposes requiring permits for private boaters on the higher-use segment from Stoneman Bridge to Sentinel Beach unless monitoring suggests that use is exceeding capacities. Permits are expected to be available through the backcountry office for wilderness segments. Should permits become necessary for other segments, they are expected to be available online on a reservation basis. The goal is an efficient system with minimal fees. Obtaining a permit adds some regulation to boaters' experiences, but this is a trade off with quality of experiences and the need to monitor use in areas newly opened to boating.

Commercial Operations—High Sierra Camps

Concern 517: The NPS should not reduce the capacity at the Merced Lake High Sierra Camps because the High Sierra Camp provides accessibility to the wilderness for people of different ages and abilities.

> *Preserving the Merced Lake High Sierra Camp is a prerequisite of my support for any proposed improvement. The High Sierra Camps provide a backcountry experience to those who would not otherwise venture off the pavement. It allows visitors to immerse themselves intimately in Yosemite's backcountry. The High Sierra Camps make possible an experience that is otherwise accessible only to those trained in backcountry camping and possessing the physical conditioning to carry a heavy pack. Alternative 5 reduces the capacity of the camp, but still preserves the facility for generations to enjoy.*
>
> (Individual; Correspondence #78)
>
> *It would be a mistake to decrease the capacity of Merced Lake High Sierra Camp. The High Sierra Camps are an excellent opportunity for people to get into the back country and experience the Yosemite high sierra region. They make it practical for a family with children to go into the high country, particularly without investing in a huge amount of camping gear. The high sierra camps are the only way many people will be able to spend an extended amount of time in the back country.*
>
> (Individual; Correspondence #468)
>
> *I would request that the High Sierra Camps and Trail Ride not be eliminated or downsized. They afford the opportunity to people of various physical abilities to enjoy the park more, not just the avid backpacker in great shape.*
>
> (Individual; Correspondence #2533)

Response: The Merced River Plan considers a range of alternatives for the Merced Lake High Sierra Camp. While Alternative 5 (Preferred) does reduce the camp's capacity, the number of 42 beds proposed closely mirrors the existing average occupancy of the camp (about 75% season-long) while addressing the issues of the camp's effects on Wilderness character. Therefore, this type of access will remain available for people of different ages and abilities.

Concern 518: The NPS should not reduce the Merced Lake High Sierra Camp because it could impact the operations and experience of the High Sierra Camp loop system.

> *I am under the impression that the Merced Lake High Sierra Camp is frequently not full, so reducing it's size to decrease its impact on the area makes sense. But, a balance of capacity throughout the loop is important, and I strongly suggest that you consult with the concessionnaire operating the Camps before determining the desirable size of Merced Lake. Decreasing the capacity excessively at Merced Lake, for example, might have a negative effect on the already very limited availablity at Sunrise and Vogelsang.*
>
> (Individual; Correspondence #358)
>
> *Retaining the [Merced Lake High Sierra Camp] camp at 60 beds provides the opportunity for a multiple night stay that is important in relation to planned High Sierra Camp Loop trips and for others looking for an extended night in the High Camps. We are concerned that fewer visitors will be able to experience the spectacular Wilderness segments of the Merced River, with no resulting environmental gain. We are also concerned whether the reduction of the Merced Lake and Glen Aulin HSCs (called for in the Tuolumne River Plan) is consistent with the intent of Congress because the High Sierra Camps were designated as "enclaves" and excluded from Wilderness in 1982.*
>
> (Business; Correspondence #2818)

Response: The NPS carefully considered the impacts of its proposed actions at Merced Lake High Sierra Camp on the other camps in the High Sierra Camp system, and found that the proposed reduced capacity of 42 beds in Alternative 5 (Preferred) would not adversely impact the continued operation of the system. The capacity in Alternative 5 (Preferred) is equivalent to that of the next largest High Sierra Camp, Vogelsang.

Concern 519: The NPS should remove the Merced Lake High Sierra Camp because of its negative impact on river values and wilderness character.

> *The Merced Lake High Sierra Camp would continue to be a detriment to the wilderness experience under Alternative 5. Retaining permanent structures at the Merced Lake Camp negatively affects the Wilderness experience (recreational ORV), and has visual impacts (scenery ORV), and it prevents the area from being designated as wilderness.*
>
> (Individual; Correspondence #2212)
>
> *Please remove all four of the High Sierra Camps in the Merced River's watershed, restore the sites, and recommend them for wilderness designation.*
>
> (Individual; Correspondence #2227)
>
> *The High Sierra camps at Glen Aulin and Vogelsang are not consistent with the intent of the Wilderness Act, with protecting the Yosemite high Sierra, and with the enjoyment of the majority of people who visit there.*
>
> *For the pleasure of the few who can afford luxury trips to these camps, the area and I and the rest of visitors have to suffer the animal dust, the manure, and, as the UC Davis studies have shown, the high concentrations of coliform bacteria in the water.*
>
> (Individual; Correspondence #2234)
>
> *How can the DEIS conclude that it's preferred alternative--one that retains the High Sierra Camp at Merced Lake--is the environmentally preferred alternative given the analysis in Chapter 9? How can*

this be the environmentally preferred alternative when grazing will continue in East Merced meadow (administrative use) when the area is in unacceptable condition?

(Individual; Correspondence #2730)

Congress specifically recognized these threats to Yosemite when it passed the California Wilderness Act of 1984. That Act, signed by President Reagan, bestowed formal wilderness designation upon much of the Yosemite backcountry. Congress allowed the HSCs to (temporarily) remain, but stated: "?If and when it occurs that continued operation of these facilities?results in an increased adverse impact on the adjacent wilderness environment (including increased adverse impact on the natural environment within the enclaves themselves), the operation of these facilities shall be promptly terminated, the facilities removed, the sites naturalized, and in the procedure set forth by section 9 of the bill, the areas promptly designated as wilderness." ... Your plan should permanently remove all of the HSCs discussed above, restore the sites, and propose that the potential wilderness additions be designated as wilderness as intended by Congress in the California Wilderness Act (see Section 9; and House Committee Report No. 98-40).

(Civic Group; Correspondence #3125)

Response: The California Wilderness Act of 1984 designated the area containing Merced Lake High Sierra Camp as a potential wilderness addition. A report issued by the House of Representatives (House Report 98-40, March 18, 1983) explained the intent of the California Wilderness Act with regard to Yosemite's High Sierra Camps. The report stated that if future operational standards for the camps resulted in increased adverse impacts on the adjacent wilderness environment or increased adverse impacts on the natural environment within the camp area, the camps should be promptly terminated and the areas converted to designated Wilderness. In the context of Alternative 5 (Preferred), park planners determined that the camp did not have adverse impacts on river values or the adjacent wilderness environment and thus would be retained (in a reduced capacity).

Concern 520: The NPS should consider additional management actions to reduce the impact of the High Sierra Camps.

Should changes need to be made to preserve the quality of the environment I would hope that the [high sierra] camps could remain open. Reduce the potential impact by limiting the number of campers, restrict the availability of showers, provide low impact toilet facilities but keep the camps open.

(Individual; Correspondence #892)

I encourage a modification of Alternative 5 to keep the number of beds at the Merced High Sierra Camp at 60. There are other things that could be done to reduce the impact such as composting toilets and rerouting trails around the camp that could accomplish the wish to lower the impact of the camp without reducing capacity.

(Individual; Correspondence #1051)

... instead of eliminating commercial service [of stock rides to the Merced Lake High Sierra Camp], Alternative 3 would allow for the Merced Lake High Sierra Camp operation to continue while reducing many of the negative impacts of the Camp. By removing the permanent structures, Alternative 3 also would fully allow this wild area to be designated wilderness and provide for true wilderness experience for all those who reached the area. ... A "wild" classification suggests limited development and infrastructure, thereby limiting the kinds and amounts of use that are appropriate for the segment (page 6-13)." ... CSERC urges that the FEIS acknowledge clearly that Alternative 3 provides management direction in the Merced River Plan that would not only continue to allow commercial services to provide for wilderness visitors seeking that service at a temporary camp, but the conversion of the site away from permanent structures and non-wilderness actions would then allow the area to be fully designated as Wilderness.

(Individual; Correspondence #2212)

HIGH SIERRA CAMPS:

The impact of each and every High Sierra Camp should be studied with the possibility of decreasing their size and/or eliminating them.

(Individual; Correspondence #2316)

Response: The NPS carefully considered many different options for reducing the impacts of the Merced Lake High Sierra Camp (the other high camps are outside of the Merced River corridor). Alternative 5 (Preferred) reduces the camp's size to its current average occupancy while taking several other steps to minimize its impact upon the surrounding Wilderness. For example, when the tents need to be replaced, the NPS will replace the tent fabric with colors that harmonize with the surrounding landscape to enhance the scenic quality of the camp; the flush toilets will be replaced by composting toilets; and informal trailing in the Merced Lake shore meadow will be restored.

Concern 521: The NPS should expand the High Sierra Camps to meet demand.

We strongly urge the Park Service to retain and even expand both the Merced and Glen Aulin camps.

There are very few options for back country exploration and multiple days' lodging in Yosemite or other national parks. Camps such as these allow folks like ourselves to spend multiple days in the back country without having to carry 50 pound packs, etc. We are strongly of the opinion that both of these camps are integral parts of the High Sierra camps program and we are avid supporters.

(Individual; Correspondence #191)

I am writing to you to express my heartfelt hope that you work to keep all of the High Sierra Camps open. I think that instead of being reduced in size, they should be carefully expanded to meet the demand that currently exists. I recognize that the Tuolomne River and the Merced River need to be protected. But, surely these rivers can be protected while still maintaining these camps.

(Individual; Correspondence #497)

If some of the facilities at Merced are within the high-water mark and require movement, then move them, but I urge you with all energy and conviction NOT to reduce the space for visitors at the high camps. In fact, these facilities would be among the best places for expansion, in comparison with camping facilities within the valley which offer a much reduced opportunity for the true experience of wilderness and backcountry.

(Individual; Correspondence #960)

High Sierra tent camps. The number of these should be increased and the price of lodging in them should be brought way down. Access to the back country is limited to those who can physically get there with Shangri-la on their backs. With a network of inexpensive High Sierra camps/huts (as in the European model), these areas become more accessible to an aging population as well as to families with small children. Safety will also be improved, since folks would not have to carry as much weight.

(Individual; Correspondence #993)

Response: The Merced Lake High Sierra Camp is located in a potential wilderness addition and surrounded by designated Wilderness. Expanding the camp was considered but dismissed due to the potential impacts upon wilderness character in the surrounding Yosemite Wilderness. This camp is already the largest in the system, expanding it would likely require more pack stock to supply it, more water, and more waste water capacity.

Concern 522: The NPS should retain the Merced Lake High Sierra Camp in its existing capacity because of its historical and traditional significance.

Why would you limit the capacity at Merced Lake HSC?

First of all the High Sierra Camps should be grandfathered into Yosemite's lore...

(Individual; Correspondence #41)

What i really want to focus on is the idea to augment/remove the existing Merced Lake High Sierra Camp. I guess, really, what I want to focus on is why Merced Lake is good the way it is.

Merced Lake is the furthest high sierra camp from any road. It is at a relatively low elevation and provides a good point for further exploration, of both the Lyell/Mcclure massif and the Clark range. It is a welcome respite for those who are doing the full High Sierra Camp loop, providing a less alpine, more canyon/lake environment. It seems to be a remote outpost in a beautiful, off the beaten track wilderness and provides access without too much impact on pristine wilderness.

To have this somewhat isolated outpost be the furthest camp from any road in Yosemite National Park...That is amazing, and there are vastly more amazing things you can do with Merced Lake as a key component.

(Individual; Correspondence #234)

My initial comments prior to this were concerns expressed about the High Sierra Camps possibly being removed or logistically unsustainable because pack stations would be removed. The camps are an important niche in the ethos and history of Yosemite. Additionally the camps attract individuals who can be enlisted or are already strong advocates for Yosemite.

(Individual; Correspondence #327)

Keep all 22 historic cabins at the Merced High Sierra Camp, limiting use only as necessary

(Individual; Correspondence #1851)

Also, please note that all of the High Sierra Camps are historical, and are not part of designated wilderness, and they all retain a buffer around them that is not wilderness. They are havens in Yosemite National Park that enhance visitor comfort and enjoyment, and they should remain for present and future generations to enjoy.

(Individual; Correspondence #2325)

Response: Alternative 5 (Preferred) was revised to preserve the historic integrity of the Merced Lake High Sierra Camp. Specifically, although several tent cabins will be removed, their concrete foundations will be left in place to preserve the camp's historic integrity. Alternative 5 (Preferred) reduces the camp's size to its current average occupancy while taking several other steps to minimize its impact upon the surrounding Wilderness. The NPS cannot choose to maintain existing capacities because of tradition and historic significance; all facilities and capacities must be evaluated to ensure they are protective of river values.

Concern 523: The NPS should eliminate the Merced Lake High Sierra Camp because it is inconsistent with the Recreational ORV in this segment, requires helicopter support, requires stock use support that increases impacts to trails and user conflicts, and requires the retention of the stable operation in Yosemite Valley.

Though the High Sierra Camps are very popular and only available by lottery ... there needs to be an honest and objective analysis as to whether they are consistent with the Recreation value and are to be considered as such. The preferred alternative proposes reducing the number of beds from 60 to 42; the camp operates for 9 weeks. While serving less than 3,000 visitors, this commercialization of "primitive wilderness camping" increases the impacts on the land (i.e., human-built environment at the Camp with stable requirements in the Valley, meadow and trail deterioration, on-going maintenance issues, etc.) while creating additional opportunities for conflict between users (i.e., intrusion of helicopters, stock use vs. hikers, etc.). Does the Merced High Sierra Camp support protection of the Merced River's "esthetic, scenic, historic, archeologic, and scientific features" or does it exist for the benefit of the concessionaire and a few visitors able to pay $165/person/night?

(Individual; Correspondence #1618)

Retaining the Merced Lake High Sierra Camp at any level also has a negative impact on the Valley, as supplying the Camp requires retention of Concessioner Stables and Concessioner Stables Housing Area (page 8-260).

(Individual; Correspondence #2212)

I do not support retention of the Merced High Sierra Camp, even at a reduced level. The camp's value is far exceeded by its monetary and environmental costs. In addition, the secretaries Guidelines for Eligibility, Classification, and Management of River Areas states, "Wild river areas will contain only the basic minimum facilities in keeping with the 'essentially primitive' nature of the area." The High Sierra Camp is neither a minimum facility nor essentially primitive.

(Individual; Correspondence #2989)

We think the Merced Lake High Sierra Camp should be removed. We have commented on this many times. The Merced Lake HSC necessitates the use of the Valley Stables and that facility's continued land impacts and direct impacts. The HSC negatively impacts water quality, impacts soils, native plants, and songbirds. The meadow is being grazed by stock but NPS has not yet measured impacts to establish a capacity. The recreational experience the Merced Lake HSC provides is not properly aligned with the priorities of the WSRA. It is troubling to us that the Merced CMP is considering the continued use of the Merced Lake HSC in absence of the congressionally mandated study of its effects on wilderness.

(Individual; Correspondence #3693)

Response: Alternatives 2, 3, and 4 in the Merced River Plan/FEIS consider removal of the Merced Lake High Sierra Camp or conversion to a temporary outfitter camp, with a capacity of 15. The remaining alternatives would retain the camp, with varying capacities. For example, Alternative 5 (Preferred) would retain the camp, but at a capacity of 42, with a limit applied to stock used for resupply. No discernible effects of packstock on water quality have been found in Yosemite; rather, water quality in Yosemite is excellent, far superior to state water quality standards.

A grazing capacity of up to 58 stock nights per season for Merced Lake East Meadow has been established in the FEIS for the alternatives that retain the Merced Lake High Sierra Camp; this capacity was based on the best available science.

For these reasons, the NPS believes that the actions proposed at the Merced Lake High Sierra Camp allow for the protection and enhancement of the Recreational and Biological ORVs and also the surrounding Wilderness. “River Values and their Management” (Chapter 5) details the indicator and management standards that will be used to monitor these ORVs, as well as triggers for management action and corresponding actions. The continued presence of the camp as proposed in Alternative 5 (Preferred) (42 beds) is consistent with the segment's wild classification, which was applied to this segment at a time when the camp was considerably larger (60 beds).

Concern 524: The NPS should provide clarity on the impacts of the High Sierra Camps on wilderness areas.

... the DEIS indicates the Merced camp has minor impacts to soil resources (see, for example page 9-24)? How is "minor" quantified? It apparently does not include impacts to the trail and moving visitors through the wilderness to the doughnut hole that constitutes the Merced River camp.

(Individual; Correspondence #2730)

In terms of wilderness character, ... the DEIS has problems of inconsistent analysis. For example, the DEIS clearly shows major impacts to wilderness character from the Merced camp. They are termed "major." At the same time, the DEIS claims that the preferred alternative (alternative 5) would have impacts that are "long term, negligible to minor, and beneficial." Why is there this inconsistency? ... The DEIS documents increasing recreation use for the years under study (see table 9-146). However, the

analysis of impacts does not take these increases into account in terms of wilderness character. Why not?

(Individual; Correspondence #2730)

In terms of biological impacts, the DEIS seems to claim (erroneously) there is little or no difference between the preferred alternative and the options that eliminate the Merced River camp when comparing the summary of impacts. However, Chapter 9 does show, albeit inconsistently, major difference between options regarding wilderness character, which include biological factors. This creates confusion for a decision-maker.

(Individual; Correspondence #2730)

The Park Service at Yosemite has never prepared the baseline reports or submitted the annual monitoring reports requested by Congress, and High Sierra is concerned that the Park Service has ignored and continues to scoff at Congress' direction to monitor and document the serious impacts caused by these commercial developments.

(Civic Group; Correspondence #3125)

Response: The NPS discusses the impacts of retaining or removing the Merced Lake High Sierra Camp (depending on the alternative) in the Wilderness, Visitor Experience, Historic Resources, Archeology, Scenic, and Biologic Resources sections of "Affected Environment and Environmental Consequences" (Chapter 9). Some clarification of the impacts of the High Sierra Camps was made between the draft and final plan and EIS. While the Merced Lake High Sierra Camp may have a more significant *localized* impact under some of these categories, its overall impact to the resource is small, given that it comprises a very small component of this Wild segment that runs from the Merced River headwaters to Nevada Fall. Impacts associated with any or all of the High Sierra Camps will be fully considered and analyzed in the upcoming Wilderness Stewardship Plan.

Concern 525: The NPS should provide additional analysis on the impacts of all the High Sierra Camps in the Merced River watershed, not just Merced Lake High Sierra Camp.

By way of introduction, the DEIS only analyzes the Merced River camp. This presents a problem in terms of water pollution as the other camps--Vogelsang, May Lake, and Sunrise--also drain into the Merced River. The NPS has been presented with information documenting water pollution from these camps as well as from pack stock use.

(Individual; Correspondence #2730)

High Sierra is concerned about the commercial "High Sierra Camps" (HSCs) at Vogelsang, May Lake, Sunrise, and Merced Lake, all of which drain to the Merced River.

(Civic Group; Correspondence #3125)

Response: The Merced River Plan proposes site specific planning solutions for facilities in, and in some cases adjacent to, the designated river corridor. The plan also adopts a user capacity program to ensure that use levels within the river corridor are protective of river values. The only High Sierra Camp located within the Merced River corridor is the camp at Merced Lake. None of the other High Sierra Camps in the park are within or even adjacent to the Merced River corridor and therefore are outside the scope of the Merced River Plan. Additional analysis of the cumulative impacts of all the High Sierra Camps will be addressed in the Wilderness Stewardship Plan for both the Merced and Tuolumne River watersheds.

Concern 526: The NPS should retain the Merced Lake High Sierra Camp in its existing capacity because Congress intended these camps be enclaves excluded from Wilderness.

> *We are concerned that fewer visitors will be able to experience the spectacular Wilderness segments of the Merced River, with no resulting environmental gain. We are also concerned whether the reduction of the Merced Lake and Glen Aulin HSCs (called for in the Tuolumne River Plan) is consistent with the intent of Congress because the High Sierra Camps were designated as "enclaves" and excluded from Wilderness in 1982.*
>
> (Business; Correspondence #2818)

Response: The California Wilderness Act of 1984 designated the area containing Merced Lake High Sierra Camp as Potential Wilderness; however, the camp is surrounded by designated Wilderness (the camps are not excluded from Wilderness). If the non-conforming use of the Merced Lake High Sierra Camp was removed, the area would automatically be converted to designated Wilderness, as proposed in Alternatives 2 and 4. However, in the context of Alternative 5 (Preferred), park planners determined that the camp did not have adverse impacts on river values or the adjacent wilderness environment and thus would be retained (in a reduced capacity).

Concern 527: The NPS should remove the Merced Lake High Sierra Camp to convert it to designated camping like Backpackers Camping Area.

> *Remove Merced Lake High Sierra Camp; infrastructure removed and area restored/converted to a backpacker's campground like Little Yosemite Valley.*
>
> (Individual; Correspondence #3325)

Response: The NPS considered the removal of Merced Lake High Sierra Camp and converting this area to designated Wilderness in Alternatives 2, 3, and 4. Please see the discussion of these alternatives in "Alternatives" (Chapter 8), and the analysis of the effects of these actions in "Affected Environment and Environmental Consequences" (Chapter 9).

Concern 528: The NPS should monitor and document the impacts to the Wilderness caused by the High Sierra Camps, and submit these findings to the relevant House and Senate committees, as directed by Congress.

> *...Because of the importance of continuing monitoring and assessment of this situation, immediately upon enactment of this bill into law, the Secretary of the Interior should document current baseline operational and environmental impact conditions of all of these facilities [HSC camps], and he should also, within one year of the date of enactment, report in writing to the relevant committee of the House and Senate, his findings and recommendations as to this matter. Annual assessments of this situation should thereafter be made by the Secretary to assure continued monitoring of conditions." (House Committee Report No. 98-40)*
>
> *The Park Service at Yosemite has never prepared the baseline reports or submitted the annual monitoring reports requested by Congress, and High Sierra is concerned that the Park Service has ignored and continues to scoff at Congress' direction to monitor and document the serious impacts caused by these commercial developments.*
>
> (Civic Groups; Correspondence #3125)

Response: As part of the planning process for the Merced River Plan, the National Park Service assessed the impacts of the camp under NEPA, evaluated the effects of the camp on river values pursuant to WSRA, evaluated proposed modifications to the camp under the National Historic Preservation Act, and considered the effects of the camp on wilderness character. Based on these analyses, the NPS determined that it was appropriate to retain the camp at a reduced size and with operational modifications. The Merced

Lake High Sierra Camp and the other high sierra camps will be evaluated again in the forthcoming Wilderness Management Plan.

Commercial Operations—Swimming Pools

Concern 529: The NPS should retain the swimming pools because removing them will result in crowding on the Merced River and subsequent environmental impacts.

> *Eliminating activities for visitors staying in the park once they are already there is not going to have an impact on the Merced River quality. For example, closing the swimming pools, which are currently open to people staying at Camp Curry and Yosemite Lodge will not impact the number of people who are staying in the park. If anything, it will drive MORE people to the river to cool off during the hot summer months.*
>
> (Individual; Correspondence #48)
>
> *Ironically, with the removal if the pools, as suggested in the MRP, did it ever dawn on anyone that those seeking comfort in the 3 hot summer months that apparently cause such significant imapct, will now head to the very river you are trying so hard to protect?*
>
> (Individual; Correspondence #152)
>
> *Closing the swimming pools will send more visitors wading/ swimming in the Merced River to cool off in the heat of the summer. This could cause a negative impact on one of the ecosystems that needs to be protected.*
>
> (Individual; Correspondence #1017)
>
> *Removing these swimming pools will result in increased swimming in the river, causing damage to the delicate eco systems along the river. I do not know how many people use these pools on an annual basis, but If even half of them start using the river as a swimming location you can expect some significant erosion.*
>
> (Individual; Correspondence #1424)

Response: The NPS final Alternative 5 (Preferred) calls for the retention of the swimming pools at Yosemite Lodge, The Ahwahnee Hotel, Camp Curry, and the Wawona Hotel.

Concern 530: The NPS should retain the swimming pools because the space is inadequate for other uses and no environmental gain would occur since they are located within a greater developed area.

> *Concerning the Ahwahnee pool. ... you're going to do this [remove the pool] to save a small area of space that is located so tightly behind the hotel behind the bar area and is so isolated and surrounded by the hotel that it can't be opened or used for anything else. It'll just be a blank space, and a source of aggravation for returning Ahwahnee guests.*
>
> (Individual; Correspondence #83)
>
> *The removal of pools will not add or detract from the valley since they are small in area.*
>
> (Individual; Correspondence #1206)
>
> *I strongly urge you not to remove the swimming pools in the park, particularly at the Ahwahnee Hotel. The pools add a welcome respite from the heat in summer and their impact on the natural experience is minimal. Particularly at the Ahwahnee, the pool is small and tucked away to the side so you can hardly notice it.*
>
> (Individual; Correspondence #1289)
>
> *The developed footprint in which these two pools [Ahwahnee and Yosemite Lodge] exist will still be within a greater developed area, resulting in no measurable environmental restorative gain.*
>
> (Business; Correspondence #2819)

Response: Please see the response to Concern 529.

Concern 531: The NPS should retain the swimming pools because they offer a safer swimming alternative to the river for children, visitors who are physically challenged, and the elderly.

> *The three swimming pools are an important part of familiy activities. These pools provide a safe swimming opportunity for children, the disabled and seniors. If they are removed then the children, disabled and the seniors are discriminated against by not providing this service.*
>
> (Individual; Correspondence #77)
>
> *I don't want to see the swimming pools removed because swimming pools give visitors another option and reduce crowding on the river. Because they are warmer and calmer than the river this also gives parents with small children and those who can't tolerate the temperature of the river a place to cool off in the summer as well.*
>
> (Individual; Correspondence #95)
>
> *I can get out of my wheelchair and into the pool at the Ahwahnee by myself and at the Lodge, when we stay there, the lifeguards have always helped. But I can't get into the river by myself, and even with family helping, the banks are too steep in places or too muddy/sandy. Even though I am a pretty good swimmer, the current is often beyond what I can handle.Why are you removing the pools? Because they are "not necessary?" Neither is having fun. You want me to waste vacation time on the bus to Curry, instead of letting me get to and from the other hotel pools (where I am actually staying) easily? Please reconsider removing the pools.*
>
> (Individual; Correspondence #162)

Response: Please see the response to Concern 529.

Concern 532: The NPS should retain the swimming pools at the Yosemite Lodge and the Ahwahnee because their removal would result in overcrowding at the Curry Village pool.

> *Concerning closing the Yosemite Lodge pool. The Lodge pool, Ahwahnee pool and Curry Village pool get a TREMENDOUS amount of use in the summer. The Curry pool will not handle the amount of usage demanded, and occupation controls will have to be enforced, thus causing people to be turned away. I have no doubt that people WILL be turned away, which is not an enjoyable visitor experience. Again, a guest at the Lodge will be told to hop on a shuttle or get in their car to travel across the Valley to use a pool? Then they may even get turned away? This will cause a lot of upset for guests, as a pool at the Lodge is not an unreasonable expectation. Not everyone wants to swim in a river, and I don't think the river could environmentally handle the upsurge in usage.*
>
> (Individual; Correspondence #83)
>
> *In addition this is going to cause the one remaining pool at Curry Village to become even more over crowded. This will also increase Public safety risk and liability. In order to reduce crowding I would even consider opening the Ahwahnee pool to the public, not just to Ahwahnee guest.*
>
> (Individual; Correspondence #1424)
>
> *The removal of the swimming pools at both Yosemite Lodge and The Ahwahnee will result in yet another adverse impact to the visitor experience. ... " ... Removal of the Yosemite Lodge Pool would leave only the Curry Village Pool to meet the public demand for pool swimming. The Yosemite Lodge pool is larger, with greater capacity than the Curry Village pool, thus its removal is likely to result in crowding."*
>
> (Business; Correspondence #2819)

Response: Please see the response to Concern 529.

Concern 533: The NPS should remove swimming pools from the valley because they are inappropriate within a National Park setting.

> *I can see the point of getting rid of swimming pools in hotels. Why go to Yosemite, or the Grand Canyon or Monument Valley or anywhere else of such great natural beauty and require a swimming pool? That's surely not the point of going there, and the water used is no doubt a precious commodity that should be economized at all costs.*
>
> (Individual; Correspondence #1150)
>
> *I also applaud the decision to close the swimming pools as it is both a distraction from the main purpose of the park and a significant strain on the ecology of the park.*
>
> (Individual; Correspondence #1151)
>
> *I do support removal of all swimming pools from the park, because they are incongruous with the setting----they just don't belong in a park.*
>
> (Individual; Correspondence #1160)

Response: The NPS evaluated all existing and proposed public use facilities (including swimming pools) using a rigorous, three-step process. First, this process evaluated whether each facility can be feasibly relocated outside the river corridor, considering economic and technical constraints in addition to resource and safety hazards. Second, if it was deemed infeasible to relocate the facility, NPS evaluated whether the facility is necessary for public use or resource protection. Determinations of the kinds of facilities that are necessary were informed by the National Park Service's Management Policies 2006 and by Yosemite's 1980 General Management Plan (GMP), in addition to WSRA. Lastly, if a public use facility was deemed infeasible to relocate and necessary for public use or resource protection, NPS evaluated whether the facility can be maintained without adverse effects to river values. See Development of Lands and Facilities (Chapter 7) for a full discussion. Removal of pools at the Ahwahnee Hotel and Yosemite Lodge was considered under Alternatives 2, 3, and 4. However, Alternative 5 (Preferred) proposes to retain these pools because they cannot be relocated, they are necessary for public use under this alternative, they have no localized adverse effects on river values, and public comment overwhelmingly opposed their removal.

Concern 534: The NPS should retain the swimming pools and expand visitor access.

> *The hours for the pools should be EXTENDED, not cut back, so that the pool is an option instead of swimming in the river at the end of a day of hiking around the park on a hot summer day.*
>
> (Individual; Correspondence #48)

Response: Please see the response to Concern 529.

Concern 535: The NPS should relocate the Yosemite Lodge swimming pool, instead of removing it.

> *I would be happy with a new pool in a less dense location near the Lodge, but please do not eliminate it.*
>
> (Individual; Correspondence #941)

Response: The NPS considered relocating this facility outside the river corridor, but dismissed this from further analysis. Relocating the pool would be infeasible due to siting and cost constraints: there are no other resource-appropriate locations outside the river corridor suitable for this facility, the facility must be co-located with overnight accommodations, and the cost of relocating such a facility would be prohibitive.

Concern 536: The NPS should retain the swimming pools at the Ahwahnee and Yosemite Lodge, because they are important features of these facilities.

Eliminating the Yosemite Lodge swimming pool however, might be a mistake. Although the pool attracts more daily use than the Ahwahnee, the impact is limited to the pool area and it's a great place for kids to enjoy...The Lodge Pool is just as much a part of the Yosemite experience as the hiking and rock climbing.

(Individual; Correspondence #923)

I also don't see how eliminating the Ahwahnee swimming pool will solve anything. But it will reduce the ambiance of the crown jewel of lodging in the NPS system.

(Individual; Correspondence #1164)

I would hope that the Plan allow for the pool at the Ahwahnee hotel to remain.

There is minimal impact on the are with the existing pool and it is a great feature of the hotel.

(Individual; Correspondence #1270)

Response: Please see the response to Concern 529.

Concern 537: The NPS should remove the Ahwahnee pool and replace the area with a green space that can be accessed by both hotel guests and other visitors.

I stay at the Ahwahnee Hotel when I visit Calif. If the pool is removed the area should be converted to garden or meadow tp provide a pleasant green space around the outside seating area.

(Individual; Correspondence #1162)

I support the removal of the Ahwahnee swimming pool because I find it a distraction to the historic significance and architecture of the Ahwahnee and it is restricted to the use of guests only so it does not serve the public as a whole.

(Individual; Correspondence #2460)

Response: Please see the response to Concern 529.

Concern 538: The NPS should retain the swimming pools because they enhance the visitor experience.

The pools were also a nice way to cool down after a long day of hiking; the removal of these would really detract from our enjoyment of the park.

(Individual; Correspondence #825)

The swimming pools have been there for a very long time and, as far as I can see, impose virtually no environmental impact on the Valley or river, while offering a measure of healthy fun - and safer that swimming in the river.

(Individual; Correspondence #2567)

The Lodge pool is a fantastic place to be after a long hike. Please keep it! There are very few places in America where we can enjoy the awesome scenery and a dip in the pool to cool off.

(Individual; Correspondence #2617)

Response: Please see response to Concern 529.

Concern 539: The NPS should retain the swimming pools because they are a safer alternative to swimming in the river.

Get rid of the swimming pools? The unintended consequences of this move, might entice swimmers into the Merced River - not a good idea. The river is trecherous and even when it looks calm on top, currents can pull a swimmer into a dangerous situation.

(Individual; Correspondence #869)

Bear in mind that without the swimming pools for the visitors, you can expect more drownings in the creeks and rivers of Yosemite

(Individual; Correspondence #873)

[Removing these swimming pools] will also endanger the public by increasing the number of people swimming in unsupervised areas of the river. Injuries and death by drowning will increase and this policy change will increase park service and concessioner liability.

(Individual; Correspondence #1424)

Taking out the pools would force all those people down to the river where the environment would be damaged and make it dangerous for many. There are enough drownings up river that you don't need to add more

(Individual; Correspondence #2120)

Response: Please see response to Concern 529.

Concern 540: The NPS should retain the swimming pools because they are a valuable asset to families, especially those with children.

I oppose removing the swimming pools and bike rentals. Recreation for children needs to have variety. Hiking is great, but children like to enjoy other exercise opportunities as well. Families can spend vacation time at the park with more than one focus if swimming and biking is retained.

(Individual; Correspondence #2529)

I have never used a pool in Yosemite. But by there removal, I believe that would impact a lot of families with small children.

(Individual; Correspondence #2621)

I think the 3 swimming pools in the park should remain for the following reasons: Children like to go swimming in the summer and the parents will take them if it is available. While they are swimming, they are not trampling the park. They are safe with life-guards. The river is not the place for them to swim because adults become distracted and fail to watch their children carefully. It is a fact that more children drown in rivers than in pools. there are no life-guards, and water curents can be decieving. Also, there are no bathrooms close by. After a 20-30 minute walk to go swimming, parents are not going to take their children back to a bathroom an hour later, not that a younger child could wait that 10-30 min hike back, so guess where? If just 10 people urinate in the river everyday (and it could be much more than 10), this would compromise the quality and integrity of the river water. Unless swimming in the rivers is to be prohibited, I truely believe that the pools offer to parents and children a safer and better alternative.

(Individual; Correspondence #2625)

We must take exception to the removal of both the Ahwahnee and Yosemite Lodge pools. These pools are totally encompassed by loding facilities which will remain. It appears illogical and, frankly, counterproductive to river values to remove them. Yosemite is one of thet nation's most treasured family destinations. Families love to swim and experience water. Many are uncomfortable allowing children to be in a river and clearly the opportunity for injury and negative resource impacts dramatically rise if the pools are removed and visitors are forced into the river for water recreation.

(County Government; Correspondence #2956)

Response: Please see response to Concern 529.

Concern 541: The NPS should clarify its analysis to provide consistent rationale for the proposed retention or removal of all four swimming pools in the river corridor.

> *There are four pools within the river corridor of the Merced (Ahwahnee, Yosemite Lodge, Wawona, and El Portal Administrative Site), with one (Curry pool) just outside the river corridor and only two are eliminated, with the justification for the El Portal pool being support to the community. The actions appear inconsistent and it is confusing to try to understand the logic associated with the outcome. The characteristics associated with the Wawona Hotel pool in considering its relocation as described in Table 8-1 1 are: 'Yes. The Wawona Hotel pool is open to hotel guests during peak periods only when weather conditions are favorable and reduces the number of people swimming in the river." The identical benefits and attributes are true for both the Yosemite Lodge and Ahwahnee poois, but with different management outcomes.*
>
> (Business; Correspondence #2819)

Response: The NPS final Alternative 5 (Preferred) proposes to retain the Ahwahnee and Yosemite Lodge swimming pools (the Curry Pool is located outside the river corridor and the Wawona Pool was retained in the draft Alternative 5 [Preferred]). Both the Ahwahnee and Yosemite Lodge pools are provided for hotel guests and are co-located with overnight accommodations. The Yosemite Lodge pool is operated as a public pool, open to Lodge guests as well as other patrons, including park employees and their dependents. Additionally, the Wawona Hotel swimming pool is a contributing resource element of the National Historic Landmark. As outlined in Development of Lands and Facilities (Chapter 7), all existing or proposed public use facilities were evaluated to determine whether (1) they could be relocated outside the river corridor, (2) if infeasible to relocate, whether the facility is necessary for public use and/or resource protection, and (3) if infeasible to relocate and deemed necessary, whether the facility can be maintained without adverse effects to river values. Swimming pools are used frequently during the summer months, are retained in Yosemite's 1980 GMP, and would be infeasible to relocate outside the river corridor. Additionally, public comment strongly opposed removal of the pools at Yosemite Lodge and the Ahwahnee Hotel.

Concern 542: The NPS should not remove the Ahwahnee swimming pool, which is compatible with the cultural landscape and was remodeled in January 2012 to be ADA compliant.

> *The Ahwahnee pool is a popular yearround amenity. While not historic, it is considered compatible with the cultural landscape as stated in the Cultural Landscape Report (CLR) and the Historic Structures Report (HSR). ... The pool at The Ahwahnee was built in 1964 and was determined to remain in the FONSI to The Ahwahnee Hotel Comprehensive Rehabilitation Plan in 2012. ... Additionally, planning is currently in the design phase to install a new east wing egress adjacent to the pool, for which construction is anticipated in 2016. The current design takes the pool area into account and designs around it. Based on this decision, the pool was recently brought into compliance with accessibility and Virginia Graham Baker Act requirements and was remodeled with new drains, deck coping, tile, plaster, filter, pump, chlorination system and accessible entry gate. The cost of this project was approximately $87,000 and was completed in January 2012. ... We question the timing of the call to remove the pool in the MRP in light of these recently completed and on going projects.*
>
> (Business; Correspondence #2819)

Response: Please see response to Concern 541.

Concern 543: The NPS should retain the swimming pools because they provide essential public shower facilities not available at campgrounds in the Valley.

> *The Lodge pool provides showers for a fee, which many campers use, as campgrounds in Yosemite do not provide this basic service. ... It also might not be possible to continue offering showers to the general public at the remaining pools.*
>
> (Business; Correspondence #2819)

Response: The NPS final Alternative 5 (Preferred) calls for the retention for the Yosemite Lodge, The Ahwahnee Hotel, Camp Curry, and the Wawona Hotel pools. However, campers may shower for a nominal fee at existing facilities in Curry Village, Housekeeping Camp, and Yosemite Lodge. California residents may be accustomed to showers in campgrounds because they are standard in state parks, but federal development standards do not require showers in campgrounds.

Commercial Operations—Ice Skating

Concern 544: The NPS should retain the ice skating rink because it provides a recreational opportunity in the winter off-season.

> *Keep the ice rink. I can verify it IS a tourist attraction and I recommend it often during the winter months. It is a unique experience ice skating in the majesty of Yosemite. It is a draw. I take a strong stand on this, this activity is important! Don't let it go by the wayside.*
>
> (Individual; Correspondence #46)
>
> *If you want more people to visit in the off season, why are you removing the ice rink?*
>
> (Individual; Correspondence #109)

Response: Please see response to Concern 548.

Concern 545: The NPS should retain the ice skating rink because of its tradition and historical significance to Yosemite.

> *I am opposed to the removal of the Curry Village Ice Rink. It has been a longstanding tradition thousands of families and has become a cultural icon over the years.*
>
> (Individual; Correspondence #69)
>
> *My family has had an ice skating outing a the ice rink for at least seven or eight years. Please do not let this slip away.*
>
> (Individual; Correspondence #121)
>
> *The ice-rink has loomed large in my life since I was 10. I am now 75. My dad was a NP Ranger at Bass Lake. ... In the winters we would come to skate. I brought my daughter there to skate for years. Last winter I brought my two grandchildren. We plan to return. Please don't take it away. It is part of Yosemite to me. That, and cross-country skiing belong there just as much as hiking.*
>
> (Individual; Correspondence #149)

Response: Please see response to Concern 548.

Concern 546: The NPS should relocate the ice skating rink out of the river corridor instead of eliminating it.

> *My wife...and I strongly disfavor that aspect of Alternatives 2-6 that would eliminate ice skating in the Valley. The outdoor rink at Curry Village was one of the best parts of winter in California while our children were growing up, and we went there many times. Whether or not the rink remains in its*

present location, it would be a shame if future generations could not enjoy this charming and low-impact activity in Yosemite.

(Individual; Correspondence #29)

Response: Please see response to Concern 548.

Concern 547: The NPS should retain the ice skating rink because it has no adverse impact on river values or the environment.

I want to know what impact the ice skating rink has on the river? It is outside the protected river boundary and, as far as I can tell, has 100% no impact on the river. How did this get included in the plan?

(Individual; Correspondence #132)

In reviewing the maps, it is difficult to see how replacing the ice rink with an employee parking lot enhances or restores the Merced's environment, or advances the overall goal in any way.

Please reconsider this part of the plan. Perhaps most of this area could serve a dual purpose by providing parking in the non-winter months but still preserve the ice rink for wintertime users, now and for generations to come.

(Individual; Correspondence #1087)

Please tell me how a skating rink at Curry Village impacts the Merced River? ... I do not understand the need to eliminate activities that are causing no harm and have been done for generations.

(Individual; Correspondence #1210)

Response: Please see response to Concern 548.

Concern 548: The NPS should retain the ice skating rink because of the unique, family-friendly visitor experience this facility provides.

Ice skating outdoors, surrounded by Yosemite's forests, rock walls and waterfalls, is an experience like no other.

(Individual; Correspondence #61)

I urge you to reconsider the plan to close the existing winter outdoor skating rink at Camp Curry. This activity provides families an option other than skiing during the winter.

This is a yearly winter treat for our entire family along with enjoying Yosemite throughout the Seasons. Our grandchildren treasure this winter experience.

If the ice rink is too close to the river perhaps there is another area where it can be located. Please consider this carefully before eliminating it altogether.

(Individual; Correspondence #219)

One of the highlights of our winter trips is skating at the ice rink in Curry Village. .. The view of snow covered Half Dome and the surrounding mountains can't be seen anywhere else in the world.

(Individual; Correspondence #1273)

I really like the ice skating rink. I know that it is a "commercial" activity on a National Park, but it is also a unique experience that is not likely to be found any place else in California. And obviously, if there are other outdoor skating rinks in California, they certainly don't have the views that Yosemite's does.

(Individual; Correspondence #1292)

Response: Alternative 5 (Preferred) **provides for** an ice skating facility for seasonal use in Curry Village at a site outside the river corridor. In Alternative 5 (preferred) the existing ice rink at Curry Village will be removed from its current location in the river corridor and replaced by a temporary or seasonal rink to be installed in the paved parking area located between the Curry Village orchard parking area and tent cabins. This site is closer to the historic location of the ice rink that was first installed at Curry Village in 1929. The site of the existing ice rink will be improved as a day-use parking area.

Concern 549: The NPS should replace the existing ice rink with a temporary or multi-purpose rink to retain ice skating as a winter-time activity.

> *Eliminating the ice rink as another idea that doesn't make good sense. I think that a parking lot can and should be put in it's place. However, during the winter there is no reason that a temporary Ice Rink couldn't be brought in. The demand for parking is decreased and the ice rink is such a great experience for families.*
>
> (Individual; Correspondence #93)
>
> *There are two mitigations to the opportunity cost of a seasonal rink: either bring in a portable refrigerated ice surface every Winter as is now done in a number of cities such as San Francisco and San Jose in the Bay Area or provide for a covering of the rink surface to make the area multi-¬-use for the other three seasons; just think of any number of large multi-¬-use arenas in which an NHL Hockey game is played one evening, an NBA basketball game is played another evening, and, in-¬-between, the Ringling Bros. Circus appears for several consecutive days. Personally, I prefer the second alternative in which the current, or a replacement, rink becomes multi-¬-use by placing wooden, ˝dance¬-floor˝ sections over the rink piping for three seasons. I think that it can have a much better "feel" than the portable, temporary, rink alternative. The Summer-¬-surface could provide an environment for evening Ranger or Jr. Ranger programs (think: lying on your back for a dark-¬-sky star talk), maybe an evening music program or a dance like the Wawona barn dances.*
>
> (Individual; Correspondence #1881)
>
> *Ice skating in the shadow of Half Dome has been a tradition since the 30's and provides locals and visitors something to do during the long winter evenings. However, the rink is unsightly during the off season. The town I grew up in would place a temporary rink on a parking lot that was used for swimming pool parking in the summer. I would support having a temporary ice rink.*
>
> (Individual; Correspondence #2460)
>
> *Can the adverse effects of operating an ice skating rink in Yosemite Valley be mitigated in such a way that ice skating remains a popular winter-time activity going forward? The answer is yes. The way to achieve this objective is to transition from the existing Curry Village Ice Rink to an environmental-friendly portable ice rink operated and maintained by the concessionaire. Portable ice rinks provide a practical alternative to permanent ice rinks and are readily available for rent or purchase from a number of reputable firms.*
>
> *Portable ice rinks of modern design are energy efficient and non-polluting. The refrigeration system, including one or more pumps used to circulate refrigerant, run on electric power derived from a nearby distribution panel. Plug-in battery-powered ice resurface complement the environmental-friendly feature of the rink.*
>
> ....
>
> *The solution proposed herein supports the continuation of ice skating in Yosemite Valley while minimizing the impact on the local environment. To ensure that the concessionaire effectively implements this solution, the NPS must first issue applicable guidelines and, additionally, perform periodic progress/performance reviews. With oversight by NPS and the full cooperation of the concessionaire, it is realistic to foresee continued support for ice skating in Yosemite Valley*
>
> (Individual; Correspondence #29342)

Response: Please see the response to Concern 548.

Concern 550: The NPS should retain the ice skating rink because of the value it provides to local and underserved communities.

> *It is also a wonderful resource for the local community. Figure skaters and hockey players of all ages enjoy improving their skills here. ...The young skaters learn to skate here, giving them something constructive to do after school. It give adults and youth a rare chance to socialize every week. Skating is excellent, constructive exercise for all ages. It also contributes to one's skiing skills, so skaters/skiers are less likely to get injured at Badger Pass. There is not very much to do in Yosemite Valley in the winter. The Ice Rink has had a strong influence on Yosemite youngsters for many years.*
>
> (Individual; Correspondence #214)
>
> *Ice skating in Yosemite National Park has a long and celebrated history and should be a recreational opportunity that the NPS strives to protect, interpret, and promote, as you did with its insertion in the NPS's holiday message inviting visitors to ice skate in Yosemite this winter. ... The ice rink supports the NatureBridge Program, connecting youth to Yosemite in a unique way. The ice rink's benefit to Yosemite is meaningful to visitors and should be retained; the retention of the ice rink should have been considered in at least one action alternative.*
>
> (Business; Correspondence #2819)

Response: Please see response to Concern 548.

Visitor Use—Fishing

Concern 551: The NPS should stock the river with fish and encourage fishing.

> *FOR A TRUE YOSEMITE EXPERIENCE TROUT FISHING SHOULD ALSO BE RESTORED IN THE MERCED RIVER AS IT RUNS THROUGH THE VALLEY FLOOR.*
>
> (Individual; Correspondence #1059)
>
> *The ability to have alternative activities and still enjoy the park (such as ice skating, fishing) are very important, so all citizens can enjoy the park. This applies to folks with stable disabilities or people who's physical abilities wax and wane.*
>
> (Individual; Correspondence #1480)
>
> *Annually stock the River above, in, and below Yosemite National Park with native California trout and encourage licensed sport fishing*
>
> (Individual; Correspondence #1670)

Response: The introduction of fish would be in contradiction to park policy, which forbids the introduction of non-native species. Although rainbow trout are native to Yosemite Valley, any rainbow trout that could now be planted would be genetically different from the original Yosemite Valley strain. Park scientists maintain that the best way to increase the quality of the Merced River fishery is to restore the interconnected riparian, meadow, and aquatic habitats, which is a core goal of the MRP.

Visitor Use—Picnicking

Concern 552: The NPS should provide additional picnic areas that are serviced by free shuttle.

> *I would also suggest a picnic area at or near the new walk in camp at Upper River. We need more shuttle accessible picnic areas.*
>
> (Individual; Correspondence #2296)

> *Because the apparent impact on the river more dispersed picnic areas should be created and published for our day use visitors. Adequate parking or free shuttle services to these sites should be provided.*
>
> (Individual; Correspondence #2387)

Response: The detailed description of Alternative 5 (preferred) of the Merced Wild and Scenic River Final Comprehensive Management Plan indicates that picnic tables will be included in the development proposal for Lower River Campground. The NPS will provide picnic tables and parking for day use and directed river access to the Housekeeping Camp eastern beach. Additionally, picnic tables will be provided near parking areas at Curry Village, Yosemite Village and Yosemite Lodge; these locations are convenient for visitors arriving in their private vehicles, will have proper food storage infrastructure, and will be serviced by the park's existing free shuttle system.

Concern 553: The NPS should include additional detail in the EIS about what the proposed picnic improvements at Yosemite Village, Church Bowl, and Happy Isles are.

> *The DEIS claims that Alternative 5 will "expand picnicking and day-use opportunities at Yosemite Village, Church Bowl, and Happy Isles." Though Church Bowl has long been a picnic area and is now proposed for an increase in parking from 24 to 32 spaces, it is unclear what is being planned at Happy Isles or Yosemite Village.*
>
> (Individual; Correspondence #1618)

Response: The Merced Wild and Scenic River Final Comprehensive Management Plan was prepared as a compliance-level planning document with detail sufficient to address specific project components, such as Curry Village lodging improvements and day-use parking, Yosemite Village day-use parking, Yosemite Lodge improvements and the Wawona Fire Station. The picnic area proposals are conceptual in nature and will not be implemented without further design and compliance work.

Visitor Use—Camping

Concern 554: The NPS should provide a detailed accounting in the EIS of the number of campsites proposed in park plans, and changes to camping inventory that have occurred over time.

> *the GMP proposed reducing the number of campsites in Yosemite Valley from 872 to 756 of which there would be 684 "family friendly" auto campsites, 58 walk-in sites, and 14 group campsites; this number accounted for the removal of 116 sites from along the banks of the sensitive Merced River. As of 1992, the Concession Services Plan documented the existence of 7 campgrounds in Yosemite Valley for a total of 817 campsites -- it would seem that this number would be the baseline for the number of campsites that existed at the time the Merced River was designated Wild and Scenic in 1987; however, it appears the Revised ORV Baseline Conditions Report is using 872 from 1980 as the baseline number. The flood of 1997 severely affected the Upper and Lower River Campgrounds as well as a portion of Lower Pines Campground, reducing the number of available campsites to 466 in the DEIS; however, the Park's Report appears to be using 436. (It sure would be nice if all documents would use the same numbers!!! Such discrepancies raise doubts as to the accuracy of any of the numbers used in the DEIS.)*
>
> (Individual; Correspondence #1617)

Response: Currently, there are 466 camp sites in Yosemite Valley, and 565 sites corridorwide. There will be 667 sites provided in Yosemite Valley under Alternative 5 (Preferred), as revised, and 766 sites corridorwide. The baseline numbers of campsites in both the DEIS and FEIS were based on existing, on-the-ground conditions as of 2011. Other inventories, whether defined by the GMP or other planning documents, or existing at the time of designation are no longer relevant given the effects of the 1997 flood and subsequent direction by the U.S. Ninth Circuit Court of Appeals to amend the GMP so that it conforms

to a legally-valid comprehensive river management plan. Once the NPS adopts the Merced Wild and Scenic River Final Comprehensive Management Plan, the specific numbers of campsites in the river corridor will be re-established by the river plan.

Concern 555: The NPS should make additional efforts to engage campers in the planning process by using the camping reservation database and communicating directly with campers during their Valley stay.

> *the NPS failed to tap into camping reservation databases to inform campers about the opportunity to participate throughout development of the new MRP and there was no effort to communicate directly with campers during their stay in the Valley. The camping public, the largest group of visitors to the Park, has been disenfranchised from the comment process for much too long.*
>
> (Individual; Correspondence #1618)

Response: In January 2010, during public scoping, the NPS mailed 33,284 postcards informing recipients of the Merced River Plan and its potential impacts to camping, lodging, transportation, and other recreational activities. The postcards also invited them to participate in the plan and provided four different methods for submitting comments or obtaining more information: email address, mailing address, fax number, and website. The recipients and their addresses were pulled from the camping reservation database (26,590 addresses), as well as people who had previously expressed interest in the Merced River Plan (6,704 addresses). In addition to the direct mailing, flyers and posters for the MRP were placed in the campgrounds and other public spaces in the park during opportunities for public involvement in the plan between November 2009 and April 2013.

Concern 556: The NPS should use a campsite occupancy average of 4.5 people rather than the maximum capacity of 6 people to calculate user capacity.

> *There are two reasons to use average campsite occupancy data rather than the maximum capacity. Accuracy is the first, but far more important is fairness in the allocation of access to the Valley among different user groups. Actual car occupancy data is used for day users (2.9 people per car), although the maximum capacity of most cars is 5 people.This means that day users are allowed into the Valley based on their actual occupancy of cars, while campers are allowed into the Valley based on the maximum capacity of their campsites, not their actual occupancy of campsites. So campers are subject to a capacity standard which reduces their collective access to the Valley by 25% as compared to the access allowed to day users. ... We therefore ask 1) that the average occupancy for campsites of 4.5 people be used for calculating overall campsite capacity in the Valley, not the legal maximum capacity of 6 people*
>
> (Individual; Correspondence #3690)

Response: When park planners calculate capacity they are doing so to account for the maximum number of people that could reasonably be expected to be in a segment at one point in time. This direction came from the Ninth Circuit Court of Appeals decision that stated "[T]he plain meaning of the phrase 'address . . . user capacities,' is simply that the CMP must deal with or discuss the maximum number of people that can be received at a WSRS." (Secretarial Guidelines at 796). The NPS uses the maximum capacity of 6 people per campsite to calculate user capacity to comply with the direction from the Ninth Circuit. The maximum number of people allowed per campsite in the park is 6. Average capacity of campgrounds varies greatly by season and even across campsites (during the high season, campground average capacities can range between 4 people per site to 6 people per site depending on the campground). In comparison, there is no single maximum number of people that can come in a private vehicle given the great variance in occupancies for private vehicles. Rather, park data indicates that the average number of people per car (2.9) does not

vary by season or from year to year. Thus this multiplier was used for the PAOT contributions from private vehicles as it is a more accurate reflection of maximum capacity from private vehicles.

Visitor Use—Camping (RV)

Concern 557: The NPS should restrict large RVs over a certain size from entering in the park in order to improve visitor experience and reduce traffic congestion.

> *I am STRONGLY IN FAVOR OF MORE CAMPGROUNDS -- with a restriction on SIZE of motorhomes -- Camping is the way for families to be able to have time to enjoy and experience the valley for a period of time and thus to form stewards for the future. Some of the motorhomes are gigantic and are a bit much for the ambiance of the valley.*
>
> (Individual; Correspondence #872)
>
> *The RV ban should be for any vehicle or combination over a certain length (25 ft?) and height (6 ft?) with self-contained sanitary and shower facilities. These are not camping vehicles but motels on wheels. They have no historical or other justification for their intrusive graphics and view blocking vertical sides which destroy the natural feel of any campground. Back in the "old days" we used to complain about the army tents for their inappropriate contribution to the feel of the campground, and at least they were green and blended somewhat into the scenery. Assigning these intrusive RV graphics to the prime campground to intrude on the visitor experience of most valley visitors is unacceptable.*
>
> *Pickup camper caps should be allowed in car camping areas, as should camping minivans. These vehicles at least have historical precedent and are less intrusive in car camping areas.*
>
> (Individual; Correspondence #2034)
>
> *I feel large motohomes, travel trailers should not be allowed in the park.*
>
> (Individual; Correspondence #2223)

Response: Park visitors have different transportation needs based on the type of experience they are seeking. To ensure equitable access for all visitors, the park will not restrict access to Yosemite Valley for any one type of vehicle. Rather, Alternative 5 (Preferred) strives to create a range of recreational opportunities for visitors. This includes providing hook-ups for a new RV-only loop in Upper Pines and an opportunity for other visitors to camp out of sight and sound from larger recreation vehicles in walk-in campgrounds. The NPS will continue to ensure an equitable distribution of camping types is available in Yosemite Valley.

Concern 558: The NPS should designate separate campground areas for RVs to reduce generator noise impacts to non-RV campers.

> *I'd like to see ALL large motor homes (class A, diesel pushers, etc) segregated in RV-only campgrounds. If that turns out to be Eagle Creek or West of Lodge, that's fine with me. They can run their generators to their heart's content. I'd be happy if the NPS would supply them with electrical hookups and charge them $10 a night for electricity. What I really don't want is the scattering of motor homes and RVs in the car-camping campgrounds where people like me prefer no generator noise. I'm proposing that at the least the Upper, Lower, and North Pines campgrounds be made "no-generator" areas. If this results in an uproar from RV owners, then create an additional RV-only campground for them. I suggest the new Lower River campground (40 sites) as RV-only. New Upper River campground could be kept as walk-in, and possibly a swap made with the new Upper Pines RV loop taking the displaced (from new Lower River) walk-ins, and RVs moved out of Upper Pines into the new Lower River.*
>
> (Individual; Correspondence #1697)
>
> *An additional alternative is to make half (40) of the new Eagle Creek (El Capitan?) campground RV/motorhome-only. This means a specific half of the area, not just half the sites.*

> *The total RV/motorhome-only sites would then be 40 (Lower River) + 40 (Eagle Creek) + 20 (west of Lodge) = 100, which is about the same as the present 96, assuming half the Eagle Creek are RV/motorhome only, and half are car-only sites. This moves RV/motorhomes away from the Pines Campgrounds completely. Little by little, for various reasons (one of them being generator noise), motor homes are driving out car campers. I think limiting motor homes to specific locations will keep this from happening.*
>
> (Individual; Correspondence #1697)

Response: The Merced River Plan includes a proposal to develop a loop with 36 RV sites with electrical connections in Upper Pines Campground. The revised Alternative 5 (Preferred) also includes an RV campground with 40 spaces adjacent to the El Portal Remote Parking Area. Alternative 5 (Preferred) includes walk-in camp sites adjacent to Upper Pines Campground, in Upper and Lower River Campgrounds and at an expanded Camp 4. The NPS is not otherwise planning a segregation of camp site uses due to fixed, existing land use patterns and resource constraints.

In existing campgrounds, RVs are excluded from certain sites by size limitations and features such as road access, narrow widths and vertical obstructions. RVs will otherwise continue to have equal access to appropriate sites as other campers under the Merced River Plan.

Concern 559: The NPS should provide campgrounds with appropriate infrastructure and facilities for RVs.

> *We own an RV and feel strongly that Yosemite should have a section of hook-ups for the RV campers. This would eliminate the need for generator use, at least in that section, and there would not be the noise factor that so irritates many tent campers and takes away from the peacefulness of the valley.*
>
> (Individual; Correspondence #1654)
>
> *Rather then increasing the size of the Lodge could you put in some full hock-ups RV sites? More camping sites are needed in the valley. I find RV camping much more comfortable then tent camping and staying in the Lodge I miss the enjoyment of the outdoors.*
>
> (Individual; Correspondence #2634)

Response: Please see response to Concern 558.

Concern 560: The NPS should reduce or eliminate the proposed RV campsites in Upper Pines campground.

> *The Sierra Club supports: ...*
>
> - *Reducing or eliminating the 36 RV sites proposed in Upper Pines campground which would allow for a more natural camping experience and help alleviate some of the large RV vehicle impacts to Valley roads.*
>
> (Individual; Correspondence #1818)

Response: The NPS is obligated to provide access and accommodation to a wide range of park visitors, and within reason, various means by which visitors can enjoy a qualitative or values-based experience in their own manner. RVs are currently excluded from other camp sites by size limitations and features such as road access, narrow widths and vertical obstructions. The proposed RV loop at Upper Pines will provide 36 spaces where RVs can be isolated from other campers. 158 new walk-in camp sites will be provided for a "more natural camping experience" at Upper Pines and Upper and Lower River Campgrounds, away from RVs and car campers.

Visitor Use—Camping (Walk-In)

Concern 561: The NPS should revise the allocation of proposed camping in Alternative 5 (Preferred) to include more drive-in camping sites and fewer walk-in camping sites.

> *The roughly 200% increase in walk-in or walk-to sites proposed in the preferred alternative of the DEIS may appeal to the strong and healthy but would certainly discourage families camping with infants and young children or with grandparents as well as the disabled. There are plenty of opportunities in the back-country for walk-in or walk-to sites but drive-in camping is the introductory activity for the novice outdoorsman and should be preserved.*
>
> (Individual; Correspondence #1618)

Response: Of the 466 existing camp sites in Yosemite Valley, 60 are walk-in sites, 4 are group administrative sites, and 402 are drive-in sites. Out of 195 newly-proposed sites in Yosemite Valley, 145 are walk-in sites, 4 are group sites, and 46 are drive-in (or RV) sites. Under the revised comprehensive management plan, the ratio of all proposed drive-in to walk-in sites is 448:195, or 2.3 drive-in sites for eve for every one walk-in site. Other commenters have requested that the number of walk-in sites be increased so that self-sufficient visitors can enjoy a camping experience without having to pitch a tent among parked cars and RVs. Walk-in camping presents a more efficient use of limited land in Yosemite Valley, which is characterized by wetlands, natural resource constraints and rock fall hazards.

Park Management—Housing

Concern 562: The NPS should remove employee housing from Yosemite Valley, as it is an inappropriate use of limited space and is inconsistent with WSRA.

> *REMOVE ALL employee housing. All employees could live in residential housing just outside the Park with free shuttle 24/7. For employees who must live within the park, they should be required to "PARK" their vehicles outside the park and shuttle in. There should be no residential servies within the park - it is too small to meet everyone's needs. DNC can build housing outside the park and shuttle their employees to work.*
>
> (Individual; Correspondence #363)
>
> *The quantity of services provided in the Valley, due in part to the "necessity" to house associated employees in the Valley as well, is too high and has an adverse impact on river values*
>
> *(Individual; Correspondence #2211)*
>
> *For years there has been a clear intent expressed through the GMP and other Park plans to move as many Park employees and administrative functions as possible to the periphery of the Park. Yet the Preferred Alternative, Alternative 5, would keep a large amount of employee housing in Yosemite Valley, rather than elsewhere in the river corridor where less crowding and congestion is occurring. - Alternative 6 finds housing for up to 314 employees outside of the 100-year floodplain in El Portal (8-297). The Park's selected alternative should relocate as much employee housing, at least the 314 proposed by Alternative 6, out of the Valley as possible because this action adheres most closely to the WSRA.*
>
> (Individual; Correspondence #2211)

Response: So long as food service, merchandise and lodging is provided in Yosemite Valley, there will be a need to provide nearby affordable employee housing. It takes approximately 1,000 employees to staff the hotels, restaurants and other recreational facilities in Yosemite Valley. The surrounding gateway communities cannot absorb the seasonally-varied numbers of concessions employees required for park use and operations. Moreover, the NPS does not have land use planning jurisdiction outside park boundaries and is not in a position to export its housing demand.

Alternative 5 (Preferred) has been revised to eliminate 164 beds proposed in new employee dormitories in the Huff House area of Curry Village. Hundreds of employee tents and hard-sided cabins-without-baths will be removed from existing employee housing areas at Lost Arrow, Huff House and Boys Town as new facilities are constructed elsewhere.

Many cities and resort communities are now requiring that hotel developers and operators provide on-site housing for low-wage earning employees. These requirements are intended to address disparities between income and local housing costs, and to mitigate transportation and parking demand. For similar reasons, the Merced River Plan includes provisions to replace some of the employee housing that was lost in the flood at Yosemite Lodge (104 beds) and to expand employee housing at the Lost Arrow (or Degnan) Dormitory (by 87 beds). Otherwise, approximately 160 additional beds would be provided at new facilities to be constructed primarily in the Rancheria Flat housing area in El Portal, with some of these beds in El Portal village. Such facilities are necessary for public use insofar as they make it possible for a wide variety of visitors to enjoy the park by various means, and protect the river resource by concentrating facilities in previously-developed areas.

Concern 563: The NPS should not construct any new employee housing within Yosemite Valley.

> *It is also the proposed actions contained in Alternative 5 that will result in the construction of additional, new permanent facilities. The proposed concessionaire housing dormitories and Park Service housing and Curry Village/Boys Town hard-sided lodging units could ALL be constructed outside of Yosemite Valley and outside of Yosemite Park ...*
>
> (Individual; Correspondence #2207)
>
> *... the 2 two-story dormitories for 104 concessioner employees at the Yosemite Lodge are NOT "facilities that are necessary for public use" nor are concessioner dormitories necessary "to protect the river resource." ? The FEIS should acknowledge that the 2 two-story dormitories for concessioner employees are facilities that would be inconsistent with the WSRA unless they are constructed outside of the river corridor. ... the 15 buildings at Huff House employee housing area and the 7 dormitories at Rancheria Flat may be highly convenient for Park employees who desire housing. However, the DEIS has not provided clear analysis showing that it is infeasible to locate employee housing outside of the Park and to provide bus transport in and out of the Park to minimize employee vehicle traffic. Even if the employee housing is found to be the most "necessary" of the proposed new construction, the concessioner employee housing and the tourist-serving Boystown structures do not meet the criteria to be allowed as major facilities in the river corridor.*
>
> (Individual; Correspondence #2210)
>
> *I strongly oppose construction of any new permanent structures in Yosemite Valley, including the proposed concessioner dormitories at Yosemite Lodge and Huff House. The NPS should be removing structures, not adding them. Concession operations should be reduced in Yosemite Valley, which will result in reductions in work force. As many employees as possible should be housed outside of Yosemite Valley.*
>
> (Individual; Correspondence #2273)

Response: Please see the response to Concern 562.

Concern 564: The NPS should ensure that new employee housing is designed with consideration given to aesthetics, scenic resources, and the cultural landscape.

> *I noticed a lot of different types of employee housing, some of which looks very ugly. Cannot the employee housing be put in less obvious places or is there not a way to hide some of it from view? Everywhere you look, there are multiple dwellings, not for the visitors, but the employees. I have never seen a park where the employee housing was so obvious.*
>
> (Individual; Correspondence #2228)

I am all for the removal of much of the "not so great" DNC Housing going away and being replaced with better housing either in the valley or El Portal. While I believe that living in a tent is one of the greatest experiences I have ever had here in the park and is a great experience for a lot of our associates, the Huff house area is way too populated and needs to be reduced in size. The park needs to make sure that whatever housing is removed will get replaced with a better option.

(Individual; Correspondence #2651)

Response: The NPS will design and build all new residential structures in accordance with "A Sense of Place," design guidelines for Yosemite National Park that were prepared in 2005 to promote the application of a national park rustic aesthetic. The majority of temporary employee housing consisting of tents and hard-sided cabins-without-bath will be removed from Yosemite Valley as permanent replacement structures are constructed at Yosemite Lodge, Lost Arrow, and in El Portal.

Concern 565: The NPS should retain employee housing within the park, and construct additional housing.

Keep the employees working inside the park and allow them to have cars. Living at El Portal is an inconvenience and puts more stress on the environment.

(Individual; Correspondence #562)

There's already not enough Employee Housing in Yosemite National Park and El Portal. More is needed.

(Individual; Correspondence #571)

Let's talk about housing for employees. There isn't enough of it. Taking out the trailers at the lodge is a good idea, they were only suppose to be there for a couple of years after the flood. But rebuild housing that was lost in the flood in an area that is not in the flood plain or rock slide area.

(Individual; Correspondence #1409)

Response: In Alternative 5 (Preferred), permanent housing facilities that exist in Yosemite Valley will largely remain in their present numbers. As stated in the revised MRP, the number of permanent housing facilities will increase by 104 beds at Yosemite Lodge and 87 beds at the Lost Arrow (or Degnan) dormitories. However, the numbers of temporary beds in trailers, tents or hard-sided cabins will be limited to approximately 20. Reductions in the number of employee beds located in Yosemite Valley will be generally augmented by new facilities in El Portal (160 additional beds). The concessioner might also re-assess functions that are currently staffed full-time in Yosemite Valley, so that existing housing assignments are more efficiently allocated to those who need to be located there.

Concern 566: The NPS should further analyze and describe the impact of relocating employee housing outside of the park on traffic and congestion.

By moving many employees to El Portal you are adding to the traffic that hits the park everyday. Currently most of the employees that would be forced to move, mainly those living in Huff housing a Lost Arrow housing units walk to work. Moving them to El Portal would force them to commute, either through a shuttle bus or with their own vehicles. During the summer when there are regularly traffic jams throughout the park this would greatly inconvenience these employees. Along with this there would be the added traffic of 100's of employees entering and leaving the park everyday, adding more strain on the already limited parking within the park.

(Individual; Correspondence #456)

... the concessioner employees are not public employees, they are working directly for a profit-driven company that has many options available for building employee housing outside of Yosemite Park. - We ask that the FEIS fully analyze exactly how many concessioner employees must be housed inside the

Park and whether a large percentage of concessioner employees could, indeed, be housed outside the Park.

(Individual; Correspondence #2211)

Response: There are no alternatives that propose relocating employee housing outside of Yosemite National Park or the El Portal Administrative Site. However, the FEIS presents a substantial description and evaluation of employees in the context of traffic and congestion. Specifically, the user capacities established for each alternative identify the portion that is "administrative" (primarily employee commuters). Furthermore, administrative capacities are included in both the people-at-one-time and vehicles-at-one-time calculations. There are also assumptions regarding transit ridership and the timing in which employees enter and leave Yosemite Valley (usually before or after peak congestion periods). Administrative and employee parking needs as well as their relative contribution to traffic and congestion are discussed in "User Capacity and Visitor Use Management" (Chapter 6) as well as in Appendix S: *Visitor Use and User Capacity Technical Report*. "Affected Environment and Environmental Consequences" (Chapter 9) analyzes impacts of different employee housing concentrations between Yosemite Valley and El Portal in the environmental consequences portion of the Transportation section.

Concern 567: The NPS should maintain, improve, and consider a new approach to management at Trailer Village/Abbieville in order to promote a positive housing environment for working families.

Please do not get rid of the current El Portal Trailor court and turn it into high-density housing single people and childless couples!...

There is very VERY little housing for DNC families, unless you have a higher management position. The Trailor Court is really our only local chance to have proper housing without moving to Mariposa. We feel that having working familes in the park is important, and we shouldn't be over-looked or neglected!

(Individual; Correspondence #1677)

Conversely, I have seen the Trailer Village devolve from a once-thriving neighborhood of families residing in government and privately owned trailers. I lived in a trailer at site G-7 in 1973. The area was generally well-maintained, and was a desirable place to live for both concessioner and federal employees. For the most part, the privately owned trailers were attractive for their era and reflected the desire of their owners to live in modest, quality homes at fit their needs. Successive decisions on the part of the NPS to eliminate housing at the Trailer Village have led to a deterioration of the living environment to the degree that the area has taken on the appearance of a ghetto operated on federal land. I recommend that the park consider how a new approach to managing the trailer village, with a long-term commitment to appropriate codes, covenants and restrictions, could help ease the critical shortage of single family housing with a mix of public and private investment.

(Individual; Correspondence #2133)

Response: The Merced Wild and Scenic River Final Comprehensive Management Plan designates the Abbieville site for riparian buffer restoration and a remote day-use parking facility for 300 vehicles. The El Portal Trailer Court would be reduced in size to accommodate the proposed 150-foot riparian buffer, with 40 spaces retained for public and administrative RV camping. Existing trailer court residents may be permitted to stay for a transitional period. But in the long term, employee housing will no longer be provided at the trailer court or in Abbieville.

Concern 568: The NPS should consider alternate locations for constructing additional employee housing within the park.

> *I would suggest the large area already used [at the stables] could be turned into employee housing. It is an area off the visitor path that already has a usage footprint. Employee usage would be less intrusive than the horse usage.*
>
> (Individual; Correspondence #2215)
>
> *Moving Employees out side the park has two negative impacts. Many people take the park jobs which may pay much lower than they could realize outside because of the priceless benefit of living in the park. They also spend their paychecks in the park. People who live where they work are more protective of that environment. Employee housing can be made unobtrusive. There are many areas of the park that would be excellent locations for the housing. The horse stables being one.*
>
> (Individual; Correspondence #2215)
>
> *The Preferred Alternative proposes a 54-employee apartment building across the road from the new Camp 4 expansion. The AAC suggests that this facility be moved next to its twin south of the Lodge so as not to impact the camping experience.*
>
> (Individual; Correspondence #3694)

Response: Alternative locations for employee housing in Yosemite Valley were analyzed in depth during the planning process for the MRP. However, most of the land in Yosemite Valley is constrained by existing development or resource or safety concerns. Land use in Yosemite Valley is programmed according to the highest and best use based on the visitor experience and restoration objectives for each alternative. As Yosemite Valley (Segment 2A), El Portal (Segment 4), and Wawona (Segment 7) each have recreational river classifications, these are the only places where residential development would be appropriate, provided that development is necessary to support public use or protect resources, and does not have an adverse effect on river values. Under Alternative 5 (Preferred), some temporary and aging employee housing is replaced with permanent housing in Yosemite Valley (191 beds); the remaining housing demand will be met through infill housing development in El Portal (160 beds).

Concern 569: The NPS should replace existing employee housing with high density housing because it is a more efficient use of limited feasible space.

> *Employee housing should not be reduced, but changed. High density dorm like buildings are a much more efficient use of land and allow more 'wilderness' to survive.*
>
> (Individual; Correspondence #1471)

Response: The NPS is indeed proposing high-density residential units where new employee housing is planned. The relative densities of proposed housing projects at Lost Arrow (or Degnan) Dormitories, Yosemite Lodge and in El Portal are 72, 62 and 78 dwelling units per acre, respectively.

Concern 570: The NPS should not delegate millions of dollars of Park funds to construct housing for concession employees.

> *CSERC asserts that It is not appropriate for the Park to use the Merced River Plan to delegate millions of dollars of Park funds to construct housing for DNC employees ... It is excessive to spend $7,700,000 of Park funds to construct housing for concessioner employees. The Concessioner is not contributing any extra funds for the construction of employee housing.*
>
> (Individual; Correspondence #2211)

Response: The concessioner would in fact contribute all funds for construction of concessioner housing through the park's concession franchise fee program. None of the park's annual budget appropriation, line

item construction or recreation fee sources would be used for this purpose. The concession franchise fee is collected as a fixed percentage of the concessioner's annual revenues and can only be used to reinvest in facilities that serve park visitors, such as lodges, hotels, food service establishments and concessions employee housing. The concessions franchise fee is intended to give the NPS more long-term control and financial security over investments made in such facilities within the national park.

Concern 571: The NPS should draft a comprehensive parkwide employee housing analysis and plan that includes the number of employees needed for a base level of service and how many of those employees require housing in Yosemite Valley.

a follow up Report GAO/T-RCED-99-119 revealed: "at Yosemite National Park, the contractor determined that, based on agency criteria, the park needed 69 units for staff to respond to after-hours incidents. However, in revising the results of the contractor's assessment, park managers more than doubled this number to 175 housing units. They did this in order to have what they thought was an acceptable number of employees who could be called back to duty during the middle of the night, when there are typically no staff on duty, or during unusually busy periods of the day. .... The Yosemite park managers' views are not consistent with the direction of the Park Service's policy that encourages parks to minimize its employee housing. ... This Report references "175 housing units," yet it appears we now have 1,136 housing units. Where is the justification??

(Individual; Correspondence #1617)

GAO Report GAO/T-RCED-98-35: "Each park that provides housing is required by the Park Service to have a housing management plan. ... The agency requires that the parks update their housing management plan every 2 years so that it reflects the current need of the park." The question raised as to the status of Yosemite's compliance with this system-wide requirement remains unanswered. .... Absent from this entire discussion is any mention of a comprehensive Park-wide Employee Housing Plan that would examine employee commuting habits, the safety of employees commuting on El Portal Road, recreational facilities for employees, support facilities (e.g., school and child care facility, small store and service station, fire station, etc.) and utilities required. Instead, employee housing construction seems to pop up arbitrarily in a variety of locations ... absent any Park-wide master planning process, justification, or accountability. No one is opposed to employees having decent housing when it is justifiably necessary, but Yosemite's track record is less than stellar and has been the subject of internal as well as congressional investigations. ... Mr. Spickard made the comment that 2 part-time employees could equal one full-time position. Does every employee bed mean that employee is working full-time??

(Individual; Correspondence #1617)

any discussion of permanent employee housing in Yosemite Valley should be integrated with a Park-wide Employee Housing Master Plan based on a comprehensive Employee Operational Analysis clarifying exactly those services that are absolutely NEEDED absent the frills of "commercialism?and fragments of suburbia" and how many employees would be required to perform those services. Until such documentation exists, any discussion of employee housing is premature.

(Individual; Correspondence #1618)

? In the DEIS, the Park did not provide a hard and vigorous analysis of WHY it is not feasible to move many of the concessioner housing units outside of the Park and bus employees in and out each day. That is a feasible and viable solution ? and FAR cheaper for taxpayers than building two new dormitories for concessioner employees at the Yosemite Lodge area.

(Individual; Correspondence #2210)

The MRP has not been consistent in its analysis of housing. All DNC concession housing in Yosemite Valley is included whether in the river corridor or not, while other housing (N PS, Ansel Adams Gallery, AT&T, Mariposa County Schools, Clinic, Dentist, US Magistrate, Post Office) is not included in the analysis. Since the plan includes an evaluation of housing opportunity outside the river corridor and outside the park, an analysis of the type and nature of all jobs should be included so that a comprehensive solution can be found. ... the Lost Arrow Dorms and Upper Tecoya housing are DNC

> *employee housing units that are located outside the river corridor, yet are included in the number of employee housing units listed in the MRP to be considered part of the user capacity for the river. The Ansel Adams housing units and the Mariposa school district apartments, located directly adjacent to the Lost Arrow Dorms, are not included. This inconsistency in identifying DNC housing (both inside and outside the river corridor) as part of the user capacity program and not providing similar treatment for the NPS and other Valley residential housing is difficult to understand.*
>
> (Business; Correspondence #2819)
>
> *Determine an accurate figure for number of full and part time employees of DNC during each season of the year. Determine an accurate figure for number of full and part time employees of NPS during each season of the year. Determine an accurate figure for number of full and part time agency employees (YI/NatureBridge, Medical clinic, Ansel Adams Gallery, Yosemite Conservancy schools, etc . . .) during each season of the year. . . . Employee housing: after need is established in terms of numbers, employees will be housed in repurposed buildings in Yosemite Village.*
>
> (Individual; Correspondence #3325)

Response: A Housing Management Plan is an administrative instrument that is routinely updated by park housing officers, reviewed and approved by both the NPS regional and national offices. Yosemite's Housing Management Plan was most recently completed and approved on February 15, 2013. This report is public information that will be made available upon request. A Housing Management Plan is not requirement of the Wild and Scenic Rivers Act or any other federal law.

The GAO report is a transcript of testimony presented to a Congressional subcommittee that summarized pre-existing policies and procedures, and does not contain regulations or guidelines. This testimony pertained to government employee housing and did not apply to concessioner employee housing. The two forms of housing are governed by distinct management policies.

With regard to comments about how concessions employee housing is evaluated, most of the housing in the park is assigned to the concessioner for employees based within Yosemite Valley. Since housing and work sites share a common transportation system and infrastructure that intersect, overlap or occupy land within Segment 2A of the Merced River corridor, the outlying housing units cannot be excluded from consideration.

Concern 572: The NPS should provide additional analysis to justify visual impacts of the proposed new employee housing.

> *absent the above-discussed needed documentation, giving the Park carte blanche to move forward with the visually intrusive construction of 4 two-story (8 occupants/building) plus 11 two-story buildings (12 occupants/building) at Curry Village, 2 very large two-story buildings (52 occupants/building) at the Lodge, permanent housing at Lost Arrow to house 50 employees, coupled with the construction of seven dormitories (12 occupants/building) at Rancheria Flat as well as replacement housing for 40 at Abbieville and Trailer Village cannot be supported.*
>
> (Individual; Correspondence #1617)

Response: The Merced Wild and Scenic River Final Comprehensive Management Plan no longer includes the housing structures that were proposed in the draft MRP at Huff House in Curry Village. The proposed facilities at Lost Arrow and Yosemite Lodge would be limited to two stories, as is most existing development in Yosemite Valley. These facilities would be designed in accordance with the "A Sense of Place" design guidelines that promote harmony between the built and natural environments. Additionally, neither site has been identified by the GMP or Scenic Vista Management Plan or MRP as being relevant to visitor

enjoyment of the park's scenic resources. No visually significant resources were identified in the Draft Baseline Conditions Report for the El Portal administrative site.

Concern 573: The NPS should not provide housing or administrative space for NatureBridge within the river corridor.

> *Contrary to what has been published in the DEIS, I do not believe that continuing to offer employee housing and administrative facilities to NB within the Merced River corridor in El Portal is essential to the park or to NB. Many organizations conducting business in the park, including the NPS, have relocated administrative headquarters and employee housing to gateway communities. I believe that NB should be encouraged to do likewise to allow the limited facilities available in El Portal and Yosemite Valley to be made available for programs that cannot be practicably sited outside the park and administrative site.*
>
> (Individual; Correspondence #2133)

Response: Assignments of administrative office space and housing units are made by park management in consideration of the needs of park partners; park partners are integral to helping the park accomplish its mission and strategic plan. NatureBridge is an operational park partner that is helping Yosemite implement its strategic plan by providing outdoor educational experiences for the region's school-aged children, and engaging the next generation of youth in park stewardship. Visiting NatureBridge students include unaccompanied minors who occupy tents in Yosemite Valley and dormitories at Crane Flat nine months a year. The program's staff and administrative offices must be located near these students.

Concern 574: The NPS should conduct a thorough analysis of employee housing in the El Portal Administrative Site and provide specific detail regarding its management during the MRP planning cycle.

> *I recommend that the Service provide a more detailed analysis that discloses how employee housing on the NPS Administrative Site is managed, and how housing will be managed during the planning cycle of the MRP. I am specifically referring to Old El Portal and the Trailer Village/Abbieville. During my tenure in the park, I have seen both neighborhoods evolve, or in the case of the trailer village, devolve. I don't believe that either location is serving the publics' best interest. The limitations on employee housing suitable for single family occupancy has created a marketplace that competes with some of the most exclusive communities in the state with very high prices being commanded (and paid) for "tear downs" in Old El Portal. I am aware that in a number of cases, purchases are made by commercial entities such as Nature Bridge, rather than private individuals. This practice has significantly skewed the market for individuals and families seeking housing within a reasonable commuting distance in an area of limited supply. I do not believe that this was the intent of Congress when Old El Portal was acquired . . .for the purpose of providing administrative facilities to support the park operation.*
>
> (Individual; Correspondence #2133)

Response: Management of the El Portal Administrative Site, which consists of closed mines and former industrial lands, is influenced by history, common law and enabling legislation. For the purpose of implementing the Wild and Scenic Rivers Act, the NPS is required to define river values and to address the kinds and amounts of use in the river corridor. Management of private housing areas, or the financial arrangements between sellers, buyers and park partners is not relevant to fulfilling the essential requirements of WSRA. The management of private homes remaining in the El Portal Administrative Site will be dealt with during a “Town Planning” effort conducted by the NPS following the MRP.

Concern 575: The NPS should retain existing housing until new code-compliant permanent housing can be constructed, and evaluate whether the existing tent cabin accommodations can remain viable for summer, seasonal employees.

> *We compliment the MRP's goal of upgrading employee housing with code-compliant facilities that complement the historic character and scenic quality of Yosemite. Creating LEED Gold or higher performance standards to reduce water and energy consumption is also appropriate for Yosemite. Our concern is ground-truthing the plan with actual site conditions and resource compliance issues that will likely take years of research, planning, and design before construction is realized. Additionally, canvas tent cabins provide seasonal employees a unique, affordable Yosemite experience. Tents match historic landscape features in Curry Village, conserve water and power, and frankly meet the needs of a seasonal operation. Rather than incur the cost and impact of replacing all of the tent cabin accommodations, we believe the NPS should evaluate whether the existing accommodations can remain viable for summer, seasonal employees.*
>
> (Business; Correspondence #2819)

Response: The existing accommodations are clearly stipulated under the 2009 Settlement Agreement as a "temporary fix to an immediate problem" in the absence of "alternatives for a permanent solution." Employee housing was introduced to these areas when nearby housing areas were closed in rock fall hazard zone at Curry Village. Maintaining high numbers of employee housing in Yosemite Valley is inconsistent with the General Management Plan of 1980. In relocating employee housing from the shadow of the Glacier Point apron to more accessible and visible areas of Curry Village, the amounts of tents and modular structures are perceived to be at conflict with more important obligations to provide for visitor use and enjoyment. The NPS recognizes that it will take many years in further planning, design and construction before canvas tent cabins are replaced by more sustainable employee quarters, and will continue to work with all concerned parties on subsequent planning stages and timing as employees are relocated from Huff House and Boys Town to locations such as Lost Arrow (87 beds), Yosemite Lodge (104 beds) and El Portal (160 beds). Under Alternative 5 (Preferred), a modest amount of employee housing (10 tent cabins, or 20 beds) will be retained for seasonal use at the Huff House area of Curry Village.

Concern 576: The NPS should evaluate and address employee housing needs and availability in Wawona.

> *There are no available employee bed spaces in Wawona [for stable employees] and the MRP did not include an evaluation of housing along this section of the WSR. We know that additional housing would be necessary to provide for this added scope of services.*
>
> (Business; Correspondence #2818)
>
> *Housing in the river corridor in Wawona is not studied at all, regardless of employer.*
>
> (Business; Correspondence #2819)

Response: Employee housing is now provided at the Kessler motor lodge cabins and in numerous houses that the NPS has acquired in Section 35. Housing in Wawona was analyzed during the MRP planning process, and the NPS believes that existing employee housing units are sufficient to support concessions and NPS operations in Wawona.

Concern 577: The NPS should not construct any additional permanent employee housing because of the potential impact on local ecology.

> *How does taking away tents and putting in building for employee housing make less of a foot print? How does tearing down trees and placing concrete make less of a footprint? as to pulling down the tents and putting up buildings- ask them just how do they reconcile an impermeable footprint with a semi-*

permeable one (when the tents are down in the winter) and what positive and negative ecological effects will that impermeable have on the watershed and local ecology?

(Individual; Correspondence #1366)

Response: The impacts caused by construction of new employee housing units at Yosemite Lodge has been addressed by area of disturbance calculations that are provided in the DEIS and FEIS. Other housing facilities will not be constructed without a subsequent environmental assessment.

The park requires employee housing for the purpose of operating visitor use facilities. Existing tent cabins are temporary by nature. Permanent facilities will ensure that employee housing conforms to federal and local housing standards.

Concern 578: The NPS should consult with the concessioner to prevent a disruption of visitor services when removing housing units greater than the total number proposed in the plan.

Under the terms of the Settlement Agreement the NPS signed in 2009, the NPS agreed to the following: "Should the ROD (Record of Decision) for the CMP (Comprehensive Management Plan) call for a reduction in employee housing units below the existing number of units, the NPS would, within three (3) months of issuance of the ROD, remove from service the number of beds that were eliminated by the CMP." There are additional provisions calling for the permanent removal of the affected beds within another three-month period. NPS has not addressed this issue in the MRP and has not consulted with us on how we can expect it to impact our ability to provide the visitor services required under our current contract. We are sure that the NPS recognizes that 90 days is not enough time to provide replacement housing and we are extremely concerned there have been no actions to resolve this matter.

(Business; Correspondence #2819)

Response: The NPS will consult with the park's primary concessioner regarding the Settlement Agreement provisions related to reductions in employee housing to minimize disruptions in visitor services as temporary housing is removed.

Concern 579: The NPS should relocate proposed employee housing outside of Yosemite National Park and provide bus service for those concessioner employees.

In the DEIS, the Park did not provide a hard and vigorous analysis of WHY it is not feasible to move many of the concessioner housing units outside of the Park and bus employees in and out each day. That is a feasible and viable solution ? and FAR cheaper for taxpayers than building two new dormitories for concessioner employees at the Yosemite Lodge area.

(Individual; Correspondence #2210)

Response: Building employee housing outside park boundaries is not possible without the active participation of local government agencies. A review of general plans for local counties indicates that none of the counties in the Yosemite region are proposing to increase land use density in the rural communities that are nearest the park. Only Mariposa County has expressed a desire to collaborate with NPS, though specific sites or communities are not addressed by the county's land use policies or maps. The NPS does not have jurisdiction outside park boundaries and cannot acquire property without prior authorization or direction by Congress and the President.

A review of the local county housing elements and the state housing policies expressed therein compel agencies to provide affordable housing, to maintain a jobs-housing balance within jurisdictions, and to reduce extraordinary commuting demands on local transportation systems. Exporting employee housing to communities long distances from the park is not feasible, and would result in increased transportation costs, higher rates of vehicle miles traveled and increased carbon and other greenhouse gas emissions, more traffic

congestion on roadways and at park entrance stations, and increased parking demand in Yosemite Valley and Wawona.

Park Management

Concern 580: The NPS should not allow local political figures to unduly influence its planning and decision-making process.

> *... neither the local congressman nor local county boards of supervisors have any authority to manage Yosemite Park or to take responsibility for the legality of Park management decisions. In fact, it is counter to our democratic process for a single Congressman to influence the outcome of a federal action. ... It is also CSERC's experience that for decades local Congressmen and local county supervisors have consistently opposed almost all environmental policies and legislation, so the latest rhetoric put forward by local region politicians is to be expected.*
>
> (Individual; Correspondence #2207)

Response: Comment noted.

Park Management—Safety

Concern 581: The NPS should allow visitors to manage their own risk exposure during recreational activities.

> *Banning our uses in certain areas to accomplish safety objectives is not the answer. We believe individuals are in the best position to make risk assessments, and we fully support the Park Service in helping to inform those assessments. In other words, through education the Park Service can allow visitors to determine which activities are appropriate for their group and skill level. Banning an activity in an area forecloses opportunities for Americans who have spent years developing the requisite skills from connecting with Yosemite in their own personal way... We ask that you reconsider using inherent risks in outdoor activities to limit or ban activities in Yosemite National Park. Keeping with a policy of supporting the exploration of National Parks by adventurous paddlers, climbers, skiers, mountain bikers, and hikers, will insure that our members continue to support the National Park Service in its role of protecting our most treasured landscapes.*
>
> (Individual; Correspondence #488)
>
> *Rather than manage activities based on a perception of risk, we believe that the Park Service should implement management actions that focus on protecting the valued resources within the Park. The current approach creates a slippery slope that will inevitably lead to a standard that will be viewed as arbitrary.*
>
> *Paddling, like all our activities, is a well-established form of recreation with a suite of skills and equipment aimed at mitigating and minimizing risks. The activity has developed in a manner that addresses the vast majority of subjective and objective hazards, regardless of the level of challenge. Simply put, very good paddlers with good gear can paddle very difficult rivers with relative ease and safety. These people have earned the keys to unlock some of the most beautiful and remote outdoor experiences on earth by building the requisite skills, knowledge, and friendships, the only true currencies of Wilderness travel. We believe that Yosemite National Park should welcome these experiences rather than turn them away.*
>
> (Individual; Correspondence #488)

Response: The MRP Alternative 5 (Preferred) has been revised since the MRP DEIS was released to open some boating in each segment of river. The NPS recognizes that visitors should be able to engage in recreational activities of their choosing, provided that they do not conflict with river values and natural resource concerns and are within the established capacities for the segment. However, some sections of the river will remain closed to recreational activity as per the Superintendent's Compendium.

Concern 582: The NPS should clearly address its plans to ensure visitor safety following implementation of the plan.

> *In addition to ensuring no adverse impact to the ORVs and free-flowing character of the River, User Capacity as defined in the '82 Guidelines imposes two additional filters: that decisions about the quantity of recreation which an area can sustain also ensure no adverse impact to the "quality of the recreation experience" and no adverse impact to "public health and safety." Failing to use the '82 Guidelines definition [of user capacity] has resulted in a DEIS with no risk management component which would include evacuation and other health/safety issues (e.g., rock-fall, hantavirus, fire, water usage/drought cycles, bus accident/multi-casualty incident response, etc.) that relate to a numerical user capacity determination in a box canyon (East Yosemite Valley). In fact, at the Mariposa meeting (3/7) the question was asked if a health and safety study had been performed during development of the Plan; the answer was no.*
>
> (Individual; Correspondence #1617)
>
> *In closing I want to note that health and safety issues should be fully vetted in the MRP/ DEIS. From E.coli, hantavirus and other vector control issues, to mass casualty incidents associated with regional transit and tour buses, to evacuation of guests during natural disasters or other types of emergencies, I feel the MRP/DEIS has not clarified how the NPS plans to protect and serve the teeming masses of summertime tourists coming to Yosemite Valley.*
>
> (Individual; Correspondence #2939)

Response: Health and safety are important considerations in capacity decision-making, providing foundational conditions for all alternatives. For example, all alternatives needed to have an adequate transportation circulation system in place at all times so orderly evacuations in response to floods or winter storms could occur. These concerns are integrated into transportation planning and transportation systems analysis (See "User Capacity and Visitor Use Management" [Chapter 6]), and act as constraints on development that may affect the number of people an area can accommodate. Similarly, public health and safety dictates additional constraints on development to avoid areas with substantial rock fall or flood hazards. Finally, all alternatives need infrastructure (e.g. sewer or utility systems) that can accommodate the volume of visitation for that alternative without polluting the river or damaging other river values. For additional information on the process used to develop capacities, what other limiting factors were considered (including health and safety concerns,) and how that impacted alternatives development, please see Chapter 6.

Concern 583: The NPS should educate recreationists on safety issues, through points of contact with park personnel, including permit issuance.

> *It is axiomatic that the Park Service must educate and actively manage casual visitors that may not be aware of the risks of rapids, cliffs, snow, and other objective hazards. For activity-oriented skilled visitors however, a different approach is warranted. For these visitors, safety can be promoted through requiring proper equipment, and in some cases educational points of contact with Park personnel (often as part of permit issuance). From our [Outdoor Alliance] perspective, this should be the default management, if there is any active management at all, of our activities across our nation's public lands. ... We believe individuals are in the best position to make risk assessments, and we fully support the Park Service in helping to inform those assessments. In other words, through education the Park Service can allow visitors to determine which activities are appropriate for their group and skill level.*
>
> (Individual; Correspondence #488)

Response: In the cases where the Merced River Plan is providing new access to activities that do not already have education mechanisms in place, the plan has endeavored to develop information on safety issues,

equipment requirements, daily capacities, and expected use patterns. These guidelines are found in Appendix R: *Boating Opportunities* and in the future may be included in other park publications.

Concern 584: The NPS should address risk of rock fall at Curry Village and implement a safety plan to protect employees and visitors in these areas.

> *Quantitative Rock-Fall Hazard and Risk Assessment Report continues to raise concerns with the respect to rock-fall risk at both Curry Village and the employee residential area (i.e., Granite Landing). That being the case, it's interesting that the 290 tent cabins retained in Curry are all located in the back nearest the rock face'seemingly at greatest risk but structurally the least protective. It is also well known that a rock-fall occurred during the construction of Granite Landing, damaging a building and injuring a construction worker ... The DEIS does not make it clear whether the building that was previously damaged will now be removed or if the Park will continue to play "Russian roulette" hoping nothing else occurs. Meanwhile the preferred alternative continues to recommend permanently locating nearly half the concessionaire workforce in this general area*
>
> (Individual; Correspondence #1618)
>
> *First, remove DNC employees from "Granite Landing" just west of Curry Village because of the looming danger in that location due to rockfall. No one should be expected to sleep in harm's way as they are; these employee dorms should have never been built and the fact that they exist is shameful, and a public safety disaster waiting to happen.*
>
> (Individual; Correspondence #3325)
>
> *A footnote to the housing matter is that the NPS has a moral responsibility to go on record now about closing some or all of the "Granite Landing" employee housing. The cover-up of the rock-fall incident during construction under the Tollefson Administration (which injured workers, and damaged at least one building, which was then secretively repaired and opened for use) was a warning that this area is not safe for habitation. This plan should deal with this problem before somebody is killed.*
>
> (Individual; Correspondence #3693)

Response: Beginning in 2010, NPS undertook a comprehensive study of rock-fall hazard and risk in Yosemite Valley. The study, conducted in collaboration with the U.S. Geological Survey and academic geologists, delineating a probabilistic rock-fall hazard line on the floor of Yosemite Valley that represents a 1/500 year exceedance (i.e., a 10% chance in 50 years that a rock-fall boulder will fall beyond the line). Once that line was delineated, all existing structures between the line and the cliff (the rock-fall hazard zone) were evaluated for risk, which depends on the location of the building within the hazard zone and the occupancy of the building (in people-hours per year). The study methods and results were extensively peer-reviewed, and were presented in a final report, which has been available to public since June 2012: http://www.nps.gov/yose/naturescience/upload/Quantitative-rock-fall-hazard-and-risk-assessment-for-Yosemite-Valley-April-2012.pdf. A presentation on how the hazard and risk study was accomplished is also posted on the park's rock fall webpage: http://www.nps.gov/yose/naturescience/rockfall.htm. The National Park Service adapted Yosemite's rock-fall policy to respond to the data and conclusions in the 2012 report. The new policy states that no new development will be placed within the rock-fall hazard zone, and that moderate- to high-risk structures be evaluated for risk reduction measures. The Merced River Plan does not propose any new development within the rock-fall hazard zone. In the Curry Village Residential Area, the two highest risk dormitories were closed to habitation in October of 2012, and use patterns for three other moderate-risk dormitories were changed to further reduce risk. Other risk reduction measures taken include closing additional structures in Curry Village, moving some campsites at Camp Four away from the cliff, and changing use patterns at the LeConte Memorial Lodge. Overall, these measures have reduced risk to structures associated with rock falls by 95%.

Park Management—Infrastructure/Utilities

Concern 585: The NPS should perform a cost-benefit and new-sourcing analysis prior to the removal of Odgers Bulk Fuel Facility.

> *Removal of the Odger Bulk Oil Facility. There is no discussion of alternatives to delivering petroleum supplies to El Portal or the Valley. This is a serious deficiency since the cost of providing alternative sources could significantly impact the already high cost of petroleum supplies to the public, NPS and the concessionaire. Nor is any recommendation given on the replacement strategy. I recommend that a thorough cost benefit and a new sourcing analysis be done before the facility is removed.*
>
> (Individual; Correspondence #2240)

Response: The presence of a fuel storage facility in a 500-year flood plain is not consistent with NPS Director's Order 77-2, Executive Order 11988, and the Wild and Scenic Rivers Act. WSRA defines a recreational river, the classification that applies to Segments 2 and 4, East Yosemite Valley and El Portal, as being readily accessible with roadways, residential and commercial development, but not industrial facilities. The Secretarial Guidelines indicate that all major facilities should be located outside the river corridor, unless relocation is infeasible and the facility is necessary to provide for public use and protect river values. The NPS is presently negotiating with the permittee to relocate this facility to a location outside the park. Cost-benefit or new sourcing analyses are not necessary when implementing federal law and policies established under the executive branch of government.

Concern 586: The NPS should further analyze the impact of growth on the Wawona wastewater treatment system, including the effects of increased wastewater on existing infrastructure and potential impacts to the river should the system fail.

> *Citizens [Citizens for the Protection and Preservation of Wawona] notes that Wawona's wastewater treatment facility is already receiving more waste than it can process and must transport wastes by truck to be processed at the El Portal Wastewater Treatment Plant.3 The DCMP/EIS is silent as to the risks associated with adding Camp Wawona's wastes to this over-taxed facility. Second, Citizens are also concerned that NPS' preferred alternative would create additional strains on the existing wastewater treatment system. The preferred alternative plans to increase visitor day use by 311 people and administrative day use by 30 people in the Wawona area. DCMP/EIS 8.233. The DCMP/EIS fails to address the impacts these users have on the already strained system, and the impacts to the River if this system fails.*
>
> (Civic Group; Correspondence #2945)
>
> *NPS must ensure that any new [septic] pump system connecting the Wawona Campground to the existing waste-treatment center be capable of functioning during harsh winter conditions and power outages, to prevent backflows into the South Fork. As NPS acknowledges, sewage lift-stations located within the 100-year floodplain "have the potential to release contaminants to the river" during floods. 9.124. While NPS downplays this corridorwide impact as "short-term" and "minor," it overlooks the predictable nature of lift-station failures. 9.124. Wawona has experienced two lift-station failures in recent years. See California State Water Resources Control Board Sanitary Sewer Overflow Incident Map, Event 791074 (January 31, 2013) Lift-Station Failure; Event 757791 (July 3, 2010) Pump–Station failure. Adding this additional station increases the opportunity for a pump station failure to leak wastewater into the River.*
>
> (Civic Group; Correspondence #2945)
>
> *By ignoring the potentially significant impacts associated with (1) introducing additional sewage to Wawona's overtaxed wastewater treatment facility, (2) failing pump or lift stations, and (3) inducing growth and consequent visitor usage, NPS has failed to take a hard look at the impacts its actions will have on the ORVs of the River both within, and downstream from, Wawona.*
>
> (Civic Group; Correspondence #2945)

Response: The MRP proposes to replace existing facilities in the Wawona Maintenance Yard, improve the surface parking area at the Wawona Store, and replace existing restrooms. These improvements are not projected to increase the volume of wastewater treated in Wawona. The existing restrooms are now heavily utilized and the proposed improvements will not increase demand, but are intended to better serve existing demand.

The NPS is not proposing any additions or expansions to the historic Wawona Hotel. The NPS is not proposing to add employee housing in Wawona. The NPS is not proposing to increase the numbers of park employees duty-stationed in Wawona. Development on private lands in Section 35 of Wawona is governed by the Town of Wawona Specific Plan, under concurrent jurisdiction of Mariposa County and the NPS. The Town Plan seeks to preserve the mountain resort and residential qualities of the Wawona area. The Wild and Scenic Rivers Act does not give the NPS authority to control use and development on private lands, including Camp Wawona, within the river corridor.

All solids from the Wawona Wastewater Treatment Plant are currently trucked out of Wawona for treatment in El Portal. The wastewater treatment plant is capable of treating daily volumes of effluent. The NPS is planning to increase on-site effluent storage in summer months when production is influenced by surges in local visitation. Increased storage will allow the NPS to ultimately extend the wastewater treatment system to the Wawona Campground, which is currently served by a septic system involving underground tanks and leach fields.

Concern 587: The NPS should further analyze the proposed site for the relocation of the RV dump station at the Wawona Campground, and consider alternatives that would have fewer impacts to the visitor experience.

> *I am against putting the RV Dump Station in the Wawona Campground! Put it at South Entrance or outside South Entrance or near the Ranger Station near the Water Treatment plant. How terrible to want to take ones family on a camping trip and end up by a RV Dump Station and have to put up with the sight, the smell and the noise.*
>
> (Individual; Correspondence #2886)

Response: The existing RV dump stations will be replaced by new facilities that are designed to retain accidental spillage and to prevent discharge, thereby protecting water quality in the Merced River. These facilities must be placed where RV owners will see them and will have convenient access. Ranger stations and waste water treatment plants are secured sites that are not always in convenient locations or accessible to the public. RV dump stations produce no smell with proper use, and no sound but that of the RV and water running through a standard faucet and garden hose.

Concern 588: The NPS should remove the gas tanks from the Wawona maintenance yard.

> *We have recently visited the Wawona area. ...The gas tanks there [in the NPS maintenance yard] should also be removed.*
>
> (Tribal Government; Correspondence #2545)

Response: The above-ground gasoline tanks will indeed be removed from the Wawona Maintenance Area before any other proposed work is initiated. The NPS now purchases gasoline at the Wawona gas station, and fuel dispensers (and tanks) are no longer needed in the maintenance yard.

Park Management—Administration

Concern 589: The NPS should not allocate funds to implement the river plan in this time of fiscal austerity.

> *Lastly. In this time when we as Americans are asking of our government to drasticly cut spending, these plans would cost an enormous amount of money to implement and maintain, while dramaticlly cutting revenues.*
>
> *Please don't throw millions of taxpayer dollars to fix something that is working well.*
>
> (Individual; Correspondence #116)
>
> *Finally, none of the other options make financial sense, especially in this time of "sequester". Spending between 200 and 400 million dollars to implement a new plan is fiscally irresponsible, wasteful and will not accomplish anything positive for the Park. This money is needed elsewhere and for more important and time critical needs (health care, education, national infrastructure, defense, etc).*
>
> (Individual; Correspondence #2147)
>
> *With sequestration and shrinking federal revenue, this is not the time to spend a quarter of a billion dollars changing what is now the defacto ecosystem of Yosemite.*
>
> (Individual; Correspondence #2250)

Response: The Merced River was designated in 1987 as Wild and Scenic, and at such time was mandated by Congress to develop a comprehensive management plan within three years of designation. Funding must be allocated to such planning efforts in order to comply with legal requirements to address the Wild and Scenic Rivers Act.

Concern 590: The NPS should consider differential pricing for entrance fees that include higher prices on holidays and busy weekends.

> *Perhaps increase the cost of day passes on holiday weekends or lower it on less busy weekends.*
>
> (Individual; Correspondence #60)
>
> *Suggest:*
>
> - *increase entrance fee during busy periods(to ~$25-$30 per vehicle), and reduce fees during slower periods to even out visitor numbers*
>
> (Individual; Correspondence #916)

Response: Entrance fees assigned to National Park Service administered lands are set by Congress through the Federal Lands Recreation Enhancement Act (REA in P.L. 108-447). This act, which authorizes the park to charge fees, provides for the different kinds of fees, the criteria for charging them and the determination of what fee will be charged. As such, it is out of scope of this to propose changes to the park entrance fees.

Concern 591: The NPS should reduce user fees if recreational opportunities are removed from the Park.

> *If the public's recreational opportunities are to be limited, then it is only equitable, via the benefits received principle, for user fees to also be reduced. Reduction of recreation opportunities without reducing fees is akin to a fee hike (level of recreation opportunity per dollar).*
>
> (Individual; Correspondence #2696)

Response: Please see the response to Concern 590.

Concern 592: The NPS should maintain resource management and law enforcement offices within the Valley but relocate non-essential administrative facilities outside of the park.

> *NPS Resources Management offices relocated back to Yosemite Valley (at the Fort?); some NPS law enforcement and first-responder to stay in the Valley. Relocate most of NPS administration, spread between existing offices in El Portal and Mariposa.*
>
> (Individual; Correspondence #3325)
>
> *Relocate DNC headquarters and, where appropriate, most warehouse operations to Mariposa.*
>
> (Individual; Correspondence #3325)
>
> *I would suggest relocating DNC management to Mariposa. Why do they all need to live in the valley?*
>
> (Individual; Correspondence #8331)

Response: The NPS has evaluated administrative use as part of the planning process for the Merced River Plan, and under Alternative 5 (Preferred), relocated some administrative functions and housing outside of Yosemite Valley, the river corridor and the park. 160 housing units are removed from Yosemite Valley and relocated to El Portal. Additionally, the proportion of employee commuters has been increased to roughly 22%. Administrative buildings in Yosemite Village are removed, and that land base is re-allocated for visitor use. The bulk fueling facility in El Portal is removed from the floodplain and relocated out of the park. The suggestion to move administrative uses back to Yosemite Valley, when they have already been transferred to El Portal, would not be in keeping with the goals of the GMP or the intent of the El Portal Administrative Site.

Concern 593: The NPS should disclose the full costs of implementation, including operational costs.

> *While the cost of alternatives is often disclosed in NEPA documents, it does not seem to be a factor in determining whether an alternative is reasonable or feasible. Given the current state of the economy, the federal budget climate and the fact that tax payer dollars will in large part fund this plan, we believe that the NPS should be responsible to clearly spell out the total costs for the various plans and how they are to be funded.*
>
> (Business; Correspondence #2819)

Response: The cost of implementing each action alternative is disclosed at the conclusion to "Alternatives" (Chapter 8) in the Alternative Project Costs table. Each project component cost presented in the table is based on an agency project scoping tool and cost estimator; these costs include escalation (inflation) depending on the projected year of implementation plus other cost associated with performing work in Yosemite National Park. In the Socioeconomic impacts analysis of "Affected Environment and Environmental Consequences" (Chapter 9), Table 9-171: National Park Service Direct Employment and Budget for Each Alternative, presents the anticipated cost for personnel service. As described in this section, over the last five years (2007-2011) the total Yosemite National Park budget has ranged from $70 to $103 million, and has averaged $89 million. After deducting the anticipated employee costs (Table 9-171) which range from $47,393,000 to $50,724,000; the remaining funding will continue to be used for maintenance and operation costs in accordance with the park's priorities. These operational costs include parkwide restoration projects, road maintenance and repairs, and other infrastructure cyclic-repair, rehabilitation and capital-improvement projects.

Concern 594: The NPS should retain Curry Village tent cabins to house seasonal employees and to offer economy-room types to the NatureBridge environmental education program.

> *... the NPS could consider the overall room mix between the Yosemite Lodge and Curry Village and consider keeping the Curry Village accommodations more rustic. We know that this would be consistent with the needs of NatureBridge, to better enable them to continue their environmental education program at cost effective levels and enhance their ability to continue under-served youth in Yosemite Valley. In fact, we are aware that NatureBridge is concerned about their institutional viability if the Preferred Alternative is adopted, due to the loss of economy room types. The area identified for upgrade at Curry Village could be upgraded to cabins without bath at its current inventory to replace the accommodation type lost in the 2008 rockfall and most desired for the NatureBridge program.*
>
> (Business; Correspondence #2818)
>
> *Under an operating contract with Delaware North Companies (DNC), our Yosemite Valley environmental education school groups occupy 91 tent units, along with 14 cabins without bath (WOBS) during our primary program season from September to mid-June. These units, in the Boystown section of Curry Village, were designated in 2008 for NatureBridge use for overnight accommodations due to their location outside documented rockfall and fly-rock zones. Our programs occupy these units during portions of the year when they might otherwise go unoccupied. The preferred alternative currently calls for the elimination of tent cabins at Boystown and replacement with 98 hard-sided units suitable for year-round use, all with private bath ... We believe the type of accommodation proposed under the Merced River Plan's preferred alternative would be an appropriate lodging type for our students and a feasible number of units to meet the needs of our programs. However, to ensure the long-term sustainability of our operation, NatureBridge has two major concerns: Cost. Like the difference in cost between the current heated tent cabins in Boystown and rooms in Yosemite Lodge, the higher-end, upscale facilities as proposed in the preferred alternative will likely translate to correspondingly higher costs. A long-term solution that places us ... with more expensive lodging would threaten the viability of our residential programs that rely on lodging in Yosemite Valley. In addition, it eliminates an opportunity for the visiting public to stay overnight in Yosemite Valley at a lower price point, thus narrowing the range of overnight accommodations available.*
>
> (Individual; Correspondence #3376)

Response: Alternative 5 (Preferred) has been revised to maintain 50 tent cabins and 14 hard-sided cabins-without-bath in the Boys Town area. These tents and cabins are typically used for NatureBridge accommodations under a private agreement between the non-profit organization and park concessioner. The NPS cannot stipulate that affordable lodging be provided to non-profit (or other park) partners. Although the concern statement and representative quotes impart broader impacts on the affordability of lodging units for park partners, there are no others disclosed by representative quotes, and no others known to park staff beyond the circumstances that are unique to NatureBridge use of Boys Town lodging.

Concern 595: The NPS should remove all non-essential administrative infrastructure in the river corridor.

> *Remove the NPS trailer offices in El Portal near Community Hall.*
>
> (Individual; Correspondence #3325)

Response: The NPS Fiscal Office trailer has been abandoned and the employees re-assigned to leased office space in El Portal. The office trailer is comprised of three modular structures that cannot be removed without a considerable physical effort and expense. The trailer will be removed as soon as a method of property disposal is initiated, and funds are made available.

Concern 596: The NPS should consider the impacts of the plan on the profitability of the concession contract, which has implications for implementation funding and deferred maintenance.

> *Based on our understanding of the cumulative cost and impacts to visitor services of the various plans, we would expect that any concession contract would not be financially able to provide funding to the park at a level close to what has been possible under the current contract. This concern is borne of a number of factors, including a reduction in the profitability of the ongoing concession operations, significant capital investment that does not produce a monetary return (construction of new housing and relocation of existing operations), the potentially significant disruption to visitor services and employee housing during implementation of the plan and the continued annual capital investment that is required to maintain the operations. These factors, together with the vagaries of public funding, might give pause to consider whether the plans can be implemented and deferred maintenance resolved over a reasonable time frame.*
>
> (Business; Correspondence #2819)

Response: The costs of implementing the MRP will indeed be significant, but will be amortized over a period exceeding 20 years. And though proposed changes would ultimately affect the annual concessions revenue, the concessioner is not responsible for incurring any of the direct costs associated with plan implementation. Adjustments made between the draft and final plan and EIS have reduced the overall cost to approximately $210 Million, almost 10 percent less than first anticipated by the DEIS. Funding sources that will be used for plan implementation include the NPS Recreation Fee Program, Concessions Franchise Fee Program and Alternative Transportation Program (funded by the Federal Highway Administration's annual budget). Of these three funding sources, only the Concessions Franchise Fees are sensitive to park operations and the concessioner's ability to sustain a profit.

The NPS recognizes that there will be substantial challenges in coordinating the sequence and phasing or timing of project implementation, and that the federal budget planning process is unstable at times. However, these three fee programs provide predictable and reliable sources of revenue for long-term project implementation. Challenges lie primarily in maintaining park operations without disruptions in all park operations, including those undertaken by the concessioner. The NPS shares the concessioner's interests in providing services for visitor use and enjoyment, and concurs that impacts on operations on park concessions must be minimized or avoided.

Park Management—Education and Interpretation

Concern 597: The NPS should engage NatureBridge students in restoration and monitoring efforts.

> *The plan calls for the restoration of over 200 acres of river and meadow habitat, along with riprap removal from riverbanks. These actions could present scientific and stewardship opportunities for NatureBridge students in partnership with NPS, on a par with the NatureBridge environmental education efforts at Olympic National Park on the Elwha River restoration. The restoration efforts outlined in the plan could create opportunities for students to engage with NPS and researchers in hands-on river restoration, including removing social trails, revegetation of riverbanks, learning about decompaction of soils, etc.*
>
> *Similarly, the ongoing monitoring of indicators and standards could open up possible opportunities for high school students to help the NPS measure and monitor restoration progress. In addition, NatureBridge students could observe NPS resource managers in action, introducing them to real-world field science endeavors that do not necessarily take place inside four walls, exposing students to a universe of careers, and creating "a new generation of citizen scientists and future stewards of our parks." (NPS Call to Action)*
>
> (Individual; Correspondence #3376)

Response: The NPS has a strong commitment to engaging volunteers in stewardship and citizen science projects. The restoration and monitoring components of the plan will provide additional opportunities for

collaboration with NatureBridge on stewardship projects that help protect and restore natural resources as well as strengthen the experiential education components of a student's visit to Yosemite National Park. As the Merced River Plan is implemented, the NPS will work closely with park partners to define ways that volunteers can be integrated into habitat restoration and monitoring efforts.

Park Management—Public Involvement—Volunteering/Programs

Concern 598: The NPS should establish a volunteer pass program that would allow visitors free access to the Park following a certain amount of time volunteering.

> *I would also like to propose "volunteering passes." If such a pass exists, I don't think the public is aware of such a program. Just think what might happen if families arrange by prior online commitment to be volunteers on a given day or days in exchange for a free pass into the park? You would have documented evidence of their intentions and participation. They could be assigned to volunteer help on specific projects that would maintain the park, help park employees, and help maintain the pristine beauty of the park all at the same time, while enjoying being in God's country. That way being assigned would also provide time to set up managerial supervision to ensure the volunteerism is properly being performed, too, not just a way to get into the park for free. They would have to agree to that online assignment arrangement before being sent a pass for that day or days.*
>
> (Individual; Correspondence #2315)

Response: The NPS is grateful to all the volunteers who donate their time to help protect and preserve our nation's treasures. Volunteers who donate 250 hours or more may receive an America the Beautiful annual park pass. Please feel free to contact our volunteer office by phone at (209) 379-1850 or via e-mail at yose_volunteers@nps.gov for more information.

Park Management—Employees

Concern 599: The NPS should mandate the number of employees needed to provide minimal visitor services and reallocate land currently programmed for administrative housing for visitor services instead.

> *Park planners claim they do not get involved in the numbers of employees DNC considers necessary to operate concession programs and services; such a "hands-off" policy might work in the outside world, but not as part of a taxpayer-subsidized monopoly. Since the Merced River DEIS is setting aside premium public land in Yosemite Valley, El Portal, and Wawona (and elsewhere) for concession employee housing, the absence of any type of Employee Operational Analysis appears to be a significant data gap in justifying what is being proposed in the preferred alternative.*
>
> (Individual; Correspondence #1617)

Response: Detailed information about concessions staffing and employee operations is proprietary and cannot be disclosed in a public planning document that is subject to scrutiny by competitors. The relationship between the NPS and its concessioners is managed through public laws, executive orders, management policies, directives and procedures. The NPS describes the kinds and amounts of concessioner services required through the release of a prospectus, which stipulates the kinds and amounts of visitor facilities to be managed and housing units that are made available to potential bidders. The NPS is not alone among federal agencies in that many rely on a corporate partner or partners to provide for visitor or employee services that are not funded by the American public. It is not in the best interests of the NPS as a government agency to dictate staffing levels or other business practices to the concessioner. Conversely, the

NPS is not required to provide housing for all concessions employees, and many choose to live outside the park. See related discussion under concern statements 562 and 565.

Note: the phrase "employee operational analysis" is not defined by federal law or standard operating procedures, but appears to be a tool used by the U.S. Postal Service and other government agencies to evaluate internal agency operations. To our knowledge, such an analysis is not a normal work product of an environmental analysis, nor is it clear how this tool would be applied by one party, in this case a government agency, to a privately-owned entity, such as a park concessioner.

Concern 600: The NPS should reduce the number of employees in Yosemite Valley in order to reduce the development footprint, streamline operations, and return to a more rustic national park experience.

> *Park documents have revealed that "the concessioner has seen a transition from predominately single college students to families as the large portion of their workforce" and that "employee beds can equal 2 to 7 people depending on the area and whether there is housing for the employee's family;" it would seem that multiplying each employee bed proposed for Yosemite Valley (1,136 beds) by anywhere from 2 to 7 people is most certainly a capacity issue that needs to be considered.*
>
> (Individual; Correspondence #1617)
>
> *At present, it appears that 80% of the development footprint in the Valley is in support of the 20% of visitors and residents who stay overnight in the park. A reduction in employees would become an opportunity to reduce the development footprint while streamlining operations and reducing impacts. And a return to a more rustic national park experience would facilitate that employee reduction*
>
> (Individual; Correspondence #1617)

Response: As noted in responses to similar comments, the numbers of employees are inextricably linked to the kinds and amounts of visitor facilities and services provided in Yosemite Valley. The numbers of employees can be reduced if restaurants, lodging units, or other services are eliminated, actions that were evaluated in the range of alternatives under Alternatives 2, 3, and 4. For capacity calculations, concessions housing is counted in “beds,” where one “bed” is equal to one employee. NPS employees are also counted in “beds,” except for NPS units that are single family residences; for these single family residences, the NPS applies an average occupancy factor for Mariposa County of 2.04 people per unit. For more information on how administrative capacity is calculated, see “User Capacity and Visitor Use Management” (Chapter 6) and “Visitor Use and User Capacity Technical Report” (Appendix S).

Concern 601: The NPS should provide a rigorous analysis of the number of employees needed for a base level of service, as well as an analysis of how many of those employees require housing in Yosemite Valley.

> *The DEIS does not include a comprehensive Employee Operational Analysis that establishes objective guidelines for a base level of services'services that are actually needed rather than catering to visitor demand'and then evaluating how many employees (NPS and Concessions) are needed to efficiently and economically perform those services. ... Such a comprehensive employee analysis needs to include an in-depth study of seasonal needs, split shifts, how many people does an employee bed really represent, needs of single employees vs. employees with families, cost-benefit evaluation of shoulder season activities vs. employees required, emergency response criteria, and more. ... A reduction in employees would become an opportunity to reduce the development footprint while streamlining operations and reducing impacts. And a return to a more rustic national park experience would facilitate that employee reduction.*
>
> (Individual; Correspondence #1617)

Response: Please see response to 599.

Concern 602: The NPS should operate concessions services in an environmentally responsible manner, rather than having private businesses provide these services.

> *I'm not sure about commercial recreational activities,but guess that would include river rafting and bike rental, which I think are nice. Why not have the Park Service run these things in an environmentally sensible way and collect the revenues?*
>
> (Individual; Correspondence #2115)
>
> *My strongest opinion concerning the management of all National Parks is that there is too much private business taking place. Concessions should be run by park service employees and should allow for the most flexibility possible in considering age, income level and personal preferences.*
>
> (Not Specified; Correspondence #16661)

Response: The relationship between the NPS and its concessioners is managed through public laws, executive orders, management policies, directives and procedures. The NPS was established to protect visitors and natural resources, build and maintain visitor use facilities, and conduct interpretive and educational services. Park staff is expressly authorized to collect park entry and camping fees. However, all profit-making services and enterprises are to be conducted by park concessioners with oversight by the NPS. The distinction has been in place since the NPS was established as a federal agency in 1916. Yosemite National Park does not have the latitude to make exceptions for certain functions, or to deviate from the agency's rule and guidelines.

Concern 603: The NPS should refine the scale of the socioeconomic impacts analysis to account for the loss of seasonal jobs in Yosemite Valley.

> *The analysis concludes that there is a net loss of four jobs from implementing the MRP in the four county area. We know that there are 90 seasonal jobs (the equivalent of 30 plus year-round jobs) associated with the recreational services that are removed from Yosemite Valley under the Preferred Alternative. The chart on page 9-1106 lists the impact on jobs by industry sector for Alternative 5. We cannot find a category where the recreation jobs might be included. ... The MRP provides 83 fewer beds for employee housing between Yosemite Valley and El Portal, so we believe the actual reduction in jobs is indicated elsewhere in the MRP and therefore should be reflected in the socioeconomic analysis.*
>
> (Business; Correspondence #2819)

Response: The "Affected Environment and Environmental Consequences" (Chapter 9) socioeconomics section factors into its regional economic analysis the impacts of changes in both seasonal and permanent employment, employee housing, and visitor lodging, across the various alternatives. With respect to employment, the federal government spending for demolition, construction, and restoration activities proposed under the plan would increase the number of seasonal job opportunities, while other elements of the plan may result in the elimination of other types of seasonal jobs. The net effect of these actions at a regional scale is then reflected in the analysis.

Concern 604: The NPS should detail the number of park employees living within Yosemite National Park and the number who live outside the park and commute in private vehicles or on the YARTS bus.

> *Determine an accurate number of park employees who live and work in Yosemite Valley, El Portal, and other communities within Yosemite National Park. Determine an accurate count of park employees who commute to work in private vehicles, as well as an accurate count of those who regularly take YARTS busses.*
>
> (Individual; Correspondence #3325)

Response: Approximately 48 NPS employees reside year-round in Yosemite Valley. These employees are required to live in government housing because they serve essential and placed-based functions, such as fire suppression, law enforcement, custodial services, campground management, snow and rock fall removal, or other key management positions. Smaller numbers of NPS employees live in government housing in Wawona, at Hodgdon Flat or seasonally in locations such as Tuolumne Meadow. Approximately 110 NPS employees rent government-owned housing units in El Portal. The number of park employees varies seasonally from 600 to 900 persons, depending on available funding for limited term and seasonally-staffed positions. While some park employees reside in Groveland or Oakhurst, the vast majority of NPS employees live in Mariposa and work at facilities in El Portal or Mariposa. There are only two or three (depending on the season) transit runs (two buses with a maximum capacity for 48 passengers) that arrive in El Portal before 8:00 A.M. Employee ridership is heavy on these runs, but is obviously limited to less than 100 persons. Residents of El Portal can also use the same buses from there to Yosemite Valley. Less than 50 NPS employees commute from Mariposa or El Portal to Yosemite Valley on a daily basis by transit bus. Many of the park's El Portal- or Mariposa-based employees serve in administrative or supporting functions and can work seven to ten days in a two week pay period without entering the park.

Partnerships/Collaborations

Concern 605: The NPS should evaluate the impact of the cumulative loss of affordable lodging on nonprofit park partners.

> *In Mr. Spickard's presentation at the February 27 public meeting, he indicated that "market economies trend toward self correction...Public lodging & camping units in the park are interconnected with private lodging in gateway communities...[and] Restrictions on supply inside the park, can increase demand outside the park." While all of these cumulative assumptions may be true for regional economies, they are not true for a nonprofit park partner like NatureBridge, whose business model for over 40 years has been dependent upon--and rooted within--the boundaries of Yosemite National Park.*
>
> (Individual; Correspondence #3376)
>
> *Under the preferred alternative, it is assumed that the higher cost lodging at the new Boystown complex would result in higher contracted lodging costs for NatureBridge that could result in the need to charge 10% or more in higher tuition costs. In a recent comparison of costs with similar experiential learning centers on the west coast, Yosemite programs represent some of the highest in the industry... Also, if it is the NPS intention that environmental education programs be operated out of the new Boystown facilities as noted in the preferred alternative, we wonder if planners considered the economic impact of higher-cost lodging on our programs and how it would affect the overall cost of environmental education in Yosemite National Park. Assuming Boystown units were mid-scale and based on comparable rates of existing Curry Village cabins with bath (approximately $150 per night), our lodging costs would increase by over 300%. We would like to see these impacts analyzed in the Merced River Plan.*
>
> (Individual; Correspondence #3376)
>
> *On page 9-1074 of Chapter 9, Socioeconomics, the impacts analysis methodology section notes, "It is assumed that park partner activities would remain the same under all alternatives."*
>
> *To the contrary, under all alternatives, proposals at Boystown in Curry Village would have a detrimental impact on NatureBridge's ability to provide lodging for the 13,000 annual participants of our field science programs. With an average program length of 4 days, this equates to 52,000 participant program days per year.*
>
> *The current socioeconomic analysis considers such a wide swath (regional economies) that the impact across all alternatives is largely negligible. However, if the scope were to be narrowed to effects on local businesses-or park partners-the impacts would be much more stark. Given the concerns noted above*

regarding the potential displacement from our current contracted lodging at Boystown-and the potential for higher costs-we suggest that NPS planners consider revisiting this analysis. In addition, it is unclear if the analysis takes into account park partner organizations, relative to the numbers of jobs and corresponding revenue of various organizations.

(Individual; Correspondence #3376)

Response: Please see response to Concern 594.

Partnerships/Collaborations

Concern 606: The NPS should detail the number of NatureBridge students in Yosemite Valley and consider reducing the number of groups allowed during peak season.

Determine an accurate figure for number of NatureBridge students/groups in Yosemite Valley, per day and per week; examine reducing number of groups allowed in Yosemite Valley, at least during late spring when the park is so busy anyway.

(Individual; Correspondence #3325)

Response: The NatureBridge program includes approximately 200 students per week, evenly divided between accommodations in Yosemite Valley and Crane Flat. With as many as 20,000 visitors in the park every day in peak periods, the NatureBridge participants represent one percent of park visitation. NatureBridge students arrive in school buses and walk from place to place once they have checked into their tent cabins. The NatureBridge program is therefore not a contributing factor in traffic congestion.

Other Comments—Local Communities

Concern 607: The NPS should retain recreational activities because of the beneficial financial impact from tourism on gateway communities.

Paddling brings much needed tourist dollars to rural towns, opening Yosemite's rivers to controlled use will create demand and help add more tourist dollars to your local towns such as Groveland, Ca or maybe Lee Vining, Ca on the east side.

(Individual; Correspondence #368)

My concern is about the removal plans for venues like the horse stables, ice skating, river rafting etc. I can't see how removing those things will do anything but harm the small towns in our area financially.

(Individual; Correspondence #403)

I can't imagine a visit to Yosemite that did not offer either the ice rink, horse back riding, rafting services and especially bike rentals. Most travelers to not have the capability to bring thier own rafts or bikes and truly enjoy seeing the park this way. I fear that many visitors will choose not to come to see Yosemite when they realize that might get bored after a day or two (not everyone loves to hike).. this would cause serious issues with Oakhurst as less tourist mean less everything. Less jobs, less income, and fewer people who could afford to remain in Oakhurst.

(Individual; Correspondence #419)

We know that there are strong political pressures on the Park Service to maintain the status quo -- to keep up the current extremely high level of recreational visits to Yosemite Valley and commercialization within the river corridor.... certain politicians are stridently opposed to even slightly reducing any commercial use or recreational opportunity in the Park because they narrowly view Yosemite as a tourist enterprise and the Park's sole purpose to be for recreation.

(Individual; Correspondence #2207)

If you take away the amenities Yosemite will lose favor for families planning vacations. The ripple effects through the local economy and to the public will be real and hard felt...

(Individual; Correspondence #3330)

Response: The "Affected Environment and Environmental Consequences" (Chapter 9) Socioeconomics section has been revised to incorporate this analysis. In this chapter, the narrative for each alternative has been expanded with a brief discussion to address these concerns. In general, the elimination of recreational services in Alternatives 2, 3, and 4 could alter spending patterns somewhat within the valley, and could make a trip to Yosemite less attractive for some people. For other people, a reduction in commercial services may make a trip to Yosemite more desirable. These effects would be minimized in Alternative 5 (Preferred), which relocates but retains most services.

Concern 608: The NPS should reduce peak visitor use levels to enhance visitor experience, despite political pressure to keep visitation high to benefit gateway community economies.

I live in Oakhurst, and I know there is a lot of pressure from the gateway communities to keep the visitor levels in Yosemite as high as possible to help the local economies. However, believe it or not, our national parks do not exist for the benefit of the gateway communities. They exist to preserve the natural ecosystem while at the same time making them accessible for the public to enjoy.

(Individual; Correspondence #1707)

Response: User capacities are an outcome of a decision-making process and part of a larger management program that considers many different inputs that include, but in no way are limited to the socioeconomics of the region. All MRP user capacities are derived from a series of judgments in the plan about river values, desired future environmental and experiential conditions, and the acceptability of facilities and infrastructure designed to handle use. Analyses examining biologic/hydrologic/geologic restoration options, facilities and services, rockfall and flood hazards, transportation (including parking and circulation), and social conditions were all important for capacity decisions. These identified where development could occur, the kinds and amounts of development needed and acceptable, how vehicles could circulate or park, and how different use levels produce different experiences at attraction sites or river use areas. Thus, each alternative capacity is the outcome of these analyses, rather than a pre-determined capacity that the alternative actions were chosen to fit within.

Concern 609: The NPS should further analyze the socioeconomic impacts of the proposed plan on nearby communities.

(2/27 webinar) on job generation and overall visitor spending in the four counties as central to the planning effort, he candidly acknowledged that there was no way to measure the substitution or displacement effect with respect to visitor behavior/activity in response to the changes proposed in the DEIS. So for gateway residents who have invested their lives and their livelihoods in an array of business ventures outside the Park in support of the GMP goal to "redirect development to the periphery of the park and beyond" so that "visitors can step into Yosemite and find nature uncluttered by piecemeal stumbling blocks of commercialism, machines, and fragments of suburbia," one would have to conclude that what the Park is now proposing in the preferred alternative is basically a crapshoot; no one knows what the fallout will be. This is confirmed in the DEIS: "?given the multitude of factors involved with visitors' recreation decision-making, it may in some cases be too difficult or speculative to project the changes in visitation patterns within the park and future visitor responses resulting from proposed ORV and facility changes" (Page 9-1076).

(Individual; Correspondence #1617)

Lastly, the Merced River Plan will greatly affect the economies of the Gateway Communities to YNP. They all rely heavily on tourism, and when visitation drops due to the lack of recreation and amenities

these communities will suffer. Alternatives 2-6 of the MRP will be detrimental to a vast number of people. The MRP will eliminate many jobs, and many livelihoods will be threatened. With 17,000 tourists using wranglers to pack them in every year and 34,000 people who hire private rafting companies, recreation will be severely limited.

(Individual; Correspondence #2325)

Removing the ice rink, elimination of the horse stables, removing the swimming pool at the Ahwahnee Hotel, and many more that have nothing to do with the river. MANY of us that live in the Yosemite area oppose these changes that remove many of the attractions for tourists from the park. I, as many do, do not see the reasoning nor benefits of these proposed changes. Tourism is the lifeblood of Mariposa and the surrounding communities. We have very little in the realm of an economy without the Park. I would request that you review the proposed changes and let the peoples of the area determine what is best for our Park and economy.

(Individual; Correspondence #2618)

PLEASE don't take our rafting, horseback riding, skating rink, bus tours. Those are fun things for families to do that drive people into the park. People coming to the park boosts the economy of the small towns surrounding the park. Our towns rely so heavily on tourism and this will only be detremental to so many families whos income comes from the Park.

(Individual; Correspondence #2619)

Response: Please see response to Concern 607.

Concern 610: The NPS should not increase in-park lodging because Gateway communities would see economic benefit by absorbing the demand for lodging.

More camping in the Valley would relieve some pressure for overnight stay as visitation increases. However, any overnight accommodation not provided in the Valley most likely would result in increases in Gateway community business and that is a good thing.

(Individual; Correspondence #3267)

Response: While 52 cabin with bath units are to be proposed at Curry Village, these essentially supplant a greater number of accommodations that were lost due to closures in the rock fall hazard zone in 2008. Under Alternative 5 (Preferred), the number of lodging units will increase by a marginal 3% in Curry Village, and would in fact decrease at Housekeeping Camp and Merced Lake High Sierra Camp (see "Alternatives" [Chapter 8]).

Other Comments—Local Communities (Wawona)

Concern 611: The NPS should relocate the Wawona stock use campground to a more appropriate area and provide multiple options for high-lines.

The Wawona Horse Camp proposal to be moved....I am in favor of this. I would like to be able to chose my spot where to high-line my horse the same way I can at the horse camps in Tuolumne and Bridalveil. There are several reasons for this.

1. Many horses cannot be tied within "kicking" range of each other. This is common and does not mean that a horse is ill behaved if they do so.

2. The current use of permanent high lines in Wawona creates a situation where, all summer long, horses are eating and "peeing" in the same spot. This is not healthy and creates all sorts of problems including more flies. Having several spots to highline or put temporary corrals up would make the situation much better. In short, I don't feel that we should be required to use the suggested highline if another spot is available (which it should be as in the other horse camps).

3. The current site is too close to the river and probably encroaches on the 150' minimum.

(Individual; Correspondence #434)

Response: The NPS has proposed a relocation of the stock camp in Wawona. The comment essentially agrees with the proposed action, adding recommendations as to how horses might be tethered by visiting equestrians. This suggestion will be helpful to campground managers, but exceeds the level of detail required for a river plan.

Concern 612: The NPS should analyze and address the cumulative impact of private actions in the river corridor in Wawona.

NPS must consider the private activity that occurs within the River corridor. For example, in Wawona, much of the Wild and Scenic area of the Merced River is surrounded by private property where infrastructure such as housing construction and power-lines have been built. The DCMP/EIS fails to analyze the cumulative impacts of private actions occurring in the town of Wawona, such as the plans to greatly expand Camp Wawona, the Seventh Day Adventist camp located near the South Fork on Forest Drive. NPS previously approved this project without compliance with NEPA, WSRA, and other environmental laws. It rescinded its unlawful approval only after Citizens proved those violations in federal court. This project would have unacceptable impacts on the River corridor – both construction and use related – that must be addressed in the cumulative impact analysis of the DCMP/EIS. Citizens expect the Final CMP/EIS to adequately address these concerns.

(Civic Group; Correspondence #2945)

Response: The Wild and Scenic Rivers Act does not provide the NPS with authority to manage activities on private land within the river corridor. As a result, the management elements of the plan do not apply to private lands in Wawona. NEPA requires the NPS to analyze the cumulative impacts of other past, present and reasonably foreseeable projects when combined with the effects of the alternatives analyzed in this plan. The Camp Wawona project is a reasonably foreseeable future project. A discussion of potential cumulative impacts associated with the Camp Wawona project has been added to "Affected Environment and Environmental Consequences" (Chapter 9).

Concern 613: The NPS should retain the stables and day rides in Wawona, but require the concessioner manage them in a way that reduces recreational user conflicts and mitigates impacts to the visitor experiences of non-stock users.

My concern in Wawona is with the stables. Their use of the meadow loop is a disservice to everyone else that uses that lovely trail. The horses tear up the trail, making it a dust bowl when it is dry, or a quagmire when it is wet. And the horses leave piles of horse poop. If you are on the trail for a run, bike or even a fast walk and you come upon one of the trail rides then you have no choice except to turn around as they move very slowly and do not allow you to pass. One time I came upon them when they were stopped to fix something, and not only did they not allow me and my friends to pass, the leader of the ride was very rude to me. He acted like it was his private riding trail, not a National Park to be shared. I don't object to the private horses as there are so few of them and I have always found them to be courtious.

(Individual; Correspondence #236)

Wawona Commercial Horseback Day Rides. While I am in favor of retaining this form of recreation in Wawona, the concessioner needs to be far more diligent in the removal of horse droppings from the Meadow Loop trail which seems to be the trail of choice for the day rides.

(Individual; Correspondence #2936)

I am for keeping the Wawona Stables but I request the stable people be made to remove the horse poop daily from the Wawona Meadow Loop Trail.

(Individual; Correspondence #2886)

Response: Under Alternative 5 (Preferred) the NPS is maintaining concessioner-provided day horseback rides. Concessions management is generally an issue not within the scope of the Merced River Plan, and is managed through concessions management policy. To address recreational user conflicts and mitigate impacts to the visitor experiences of non-stock users under existing contracts, the NPS can provide direction to concessioners through direct evaluation of services and facilities, provision of training to concession staff, and determining appropriate use areas.

Other Comments—Local Communities (El Portal)

Concern 614: The NPS should address safety and law enforcement concerns that will likely result due to the increase in employee housing in El Portal.

> *We live in old El Portal near the swimming hole on Crane Creek and we frequent swimming holes on the Merced River. By adding DNC employee housing to El Portal I truly believe the crime rate will increase along these river and creek areas. Every new Crane Creek swimmer will either walk past my home and family, plus add more impact to the clean creek corridor (broken glass, trash, bottle caps, etc.).*
>
> (Individual; Correspondence #1991)

Response: The river plan states that as many as 109 beds would be relocated to El Portal for concessioner employee housing under Alternative 5 (Preferred). The plan does not fully address compliance requirements that would allow this action to commence as a result of the plan's adoption by NPS. The preparation and completion of a subsequent environmental assessment or impact statement will be required before any additional employee housing is constructed in El Portal. Law enforcement and public safety issues would have to be addressed, along with impacts on public education and other public and social services that are provided under shared jurisdiction with the County of Mariposa.

Concern 615: The NPS should address impacts resulting from the operation of the bulk fuel facility in El Portal.

> *The NPS should describe what impacts, if any, to resources (including the Merced River) have resulted from the long-term operation of a bulk fuel facility in El Portal. Specifically, has the Merced River or any nearby resource been contaminated by this operation? What regulations apply to the management of such a facility? Are those regulations sufficient to safeguard the public interest? Are alternative sites available in the area that would provide a sufficient level of service and allow a private business to operate a financially feasible business in support of the park? It should be noted that the in 1958 the United States Congress authorized the purchase of land to create an administrative site in the El Portal area for the expressed purpose of siting necessary utilities, housing to support the operation of Yosemite National Park itself (16 USC 47-1).*
>
> (Individual; Correspondence #2133)

Response: The draft environmental impact statement addresses the removal of the Odgers Bulk Fuel Storage Facility. In "Affected Environment and Environmental Consequences" (Chapter 9), removal of this facility is noted as having a local, long-term, negligible, beneficial impact on hydrology and water quality. Under the No Action Alternative, specific impacts from the facility are described as having a local, long-term, negligible, adverse impact on water quality. Specifically, the transportation of fuels to and from the Odgers Bulk Fuel Storage Facility would continue in the Merced River corridor and therefore the risk of a fuel release would remain. However, these potential releases would be mitigated by compliance with standard regulatory requirements for the transportation and storage of such materials and operation and maintenance procedures.

Concern 616: The NPS should not construct additional housing in Old El Portal because it would likely increase traffic congestion, and because there is already a shortage of parking in this area that would be compounded by additional housing.

> *The area where these units [new housing units in Old El Portal] would be built is in the section of Old El Portal nearby the Post Office and across from the Community Hall. The Hall is in frequent use for community events as well as National Park Service training sessions and meetings. Currently the parking across from the hall serves those using the hall, but is also used by employees who work at the nearby Yosemite National Park Resources office. This is housed in the old Standard Oil Buildings that last used as housing for firefighters. Before these buildings were converted to office space the parking was used exclusively for the community hall. When the building was converted to offices, no new parking spaces created for either employees personal vehicles or work vehicles. Currently there is often a shortage of parking in this area.*
>
> (Individual; Correspondence #2856)
>
> *At present this [Old Portal area] is a high traffic area due to the proximity of the post office, firehouse, and being the main access to homes further up Foresta Road. More houses in this area would create more traffic congestion, especially during community events when there are numerous young children in the area.*
>
> (Individual; Correspondence #2856)

Response: The El Portal Administrative Site was acquired by the NPS and designated by Congress as a place to provide for the park's housing needs and means of administrative support. Additional parking spaces would be provided with any proposed housing construction. Currently limited to approximately 425 residents and served by a regional transit system, the population would increase by approximately 109 persons to 530. The amount of vehicle trips associated with this number of employees has been evaluated in the analysis of the transportation system within the corridor, and is not expected to increase traffic congestion in Segment 4. The NPS believes the El Portal community has the capacity to absorb more parking, housing development and traffic.

Concern 617: The NPS should relocate the proposed parking in El Portal because of potential adverse effects to wetland and riparian areas, and to water quality.

> *Pollution: This [El Portal remote parking area] area is very close to the river just as is the current camp 6 parking. ... Rainwater runoff from a parking lot with 200 cars would flush a substantial amount of motor oil, brake fluids, and other automotive residue into the river. As far as water quality goes this is a poor choice for a parking lot.*
>
> (Individual; Correspondence #2856)
>
> *The addition of parking at Abbieville is a bad idea. First, it ignores the unique ecology of the area, including the unique riparian terrace, and the remnant wetland feature. Runoff from cars would negatively impact water quality in this reach of the Merced; and it would create a hazard in entering the roadway. We oppose the addition of parking at Abbieville.*
>
> (Individual; Correspondence #3693)

Response: The Draft Baseline Conditions Report and related studies have assessed the ecological values of the Abbieville site. Although there are natural resources existing on the site (which has been disturbed by prior agricultural and residential uses), none of the resources are so sensitive, rare, threatened or endangered as to preclude the proposed development of visitor use facilities. Absent a specific site design and construction plan, assertions claiming impacts on water quality or site-distance conflicts are premature. The Merced Wild and Scenic River Final Comprehensive Management Plan does not currently include sufficient detail to construct the proposed facility and comply with all regulations at this time. The public

will have an opportunity to review more specific plans and construction details as they are developed, and a subsequent compliance document is completed.

Concern 618: The NPS should relocate the proposed employee housing in Old El Portal in order to preserve the downtown space for community use.

> *In the past this area [in Old El Portal proposed for new housing units] has been envisioned as a site to accommodate other community needs, such as a small play park, picnic area, or medical and dental offices. El Portal has been a community for more than 100 years. Regardless of the fact that the National Park Service purchased most of the acreage encompassing the community, it continues to be a vibrant town with numerous civic organizations and engaged residents. Mariposa County hopes to develop a town plan for El Portal, but this has been stalled by the Merced Wild and Scenic Planning process. A proposal such as infill housing in this area would pre-empt other options for the county and community in this vital "downtown" zone.*
>
> (Individual; Correspondence #2856)

Response: The Merced River Plan does not include site-specific drawings or a level of detail regarding employee housing in El Portal that is sufficient for project-level compliance at this time. In general terms, the plan proposes 12 new dwelling units (one employee bed per unit) in the established residential area east of the U.S. post office, 18 beds west of the post office (but no farther west than the river crossing of Highway 140), and 160 beds in Rancheria Flat. Based upon a yield study that considered level lands and building sites identified through past planning efforts, the NPS has determined that there is room in the residential area for up to 12 new units. More specific detail would be developed through a community-based planning process after a legally-valid MRP is completed. Nothing will be planned, design or constructed until that time.

Concern 619: The NPS should make public El Portal bathrooms available at the El Portal Market or the El Portal Community Hall in order to protect the river from human disturbance.

> *Require El Portal Market and/or the El Portal Community Hall to maintain public restrooms to protect natural values of river in El Portal.*
>
> (Individual; Correspondence #3325)

Response: Public restrooms are currently provided at the El Portal gas station, under contract with the concessioner, on the same site as the market. The community hall has restrooms, but the building is opened only for special events and public meetings or social gatherings.

Concern 620: The NPS should lift the moratorium on building expansion in El Portal and encourage private homeowners to add studio apartments in order to increase housing at a negligible cost to taxpayers.

> *Currently there is a moratorium on renovation/expansion of existing homes in El Portal that are privately owned by qualified employees. Allowing and encouraging these homeowners to add studio apartments where there is suitable space for the unit as well as parking there could be a way to provide more housing for employees at negligible cost to taxpayers.*
>
> (Individual; Correspondence #2856)

Response: The moratorium sunsets four years from its effective date unless superseded by successor Superintendent's Order, or upon completion of a Record of Decision for the *Merced Wild and Scenic River Comprehensive Management Plan*. Thus, the moratorium will be lifted once a Record of Decision for the *Final Merced River Plan/EIS* has been completed.

Concern 621: NPS should award vacant lots in El Portal to qualified employees to owner-build single family dwelling units.

> *I understand the parks need to create more housing in El Portal. I hope the housing in old EP will be single family dwellings and not dorms or duplex. As has happened in the past, lots were awarded to employees to build their own house. I strongly urge NPS to consider this again. If lots are to be built on in old El Portal let them be owner built. That way the new residents would be personally invested in the community…With ownership of ones home comes commitment and pride and investment.*
>
> (Individual; Correspondence #3537)

Response: For the purpose of determining the kinds and amount of use, pursuant to the Wild and Scenic Rivers Act, the MRP indicates that approximately 12 more units may be constructed in El Portal. The MRP will not define how these units are constructed, or by whom. Land use and development policies will be established or determined in the future, as park policy.

Concern 622: The NPS should follow through with the promise to clarify the terms of the El Portal building moratorium as part of the final EIS.

> *In El Portal, the NPS should clarify the terms of the "el portal building moratorium."The NPS made a commitment to the El Portal community many times to clarify the terms of the moratorium in the MRP. The plan appears to be silent on this issue. Please be responsible and release something in the same time frame as the plan.*
>
> (Individual; Correspondence #3434)

Response: Please see response to Concern 620.

6.0 TECHNICAL CORRECTIONS AND CLARIFICATIONS

Source	Location	Correction or Clarification
Public	Throughout	Revised environmental consequences section of multiple impact topics to include discussion of the cumulative impacts of other plans in progress, including the Tuolumne River Plan and the Mariposa Grove Restoration Plan.
Internal	Throughout	Revised all references to reduction in use/removal of 11 tents at Merced Lake High Sierra Camp to be consistent.
Public	Throughout	Corrected the employee bed number at the Concessioner Stables.
Public	Throughout	Corrected heading errors that indicated El Portal (Segment 4) is classified as "scenic" instead of "recreational."
Internal	Chapter 3	Added additional information to explain why each segment is classified the way it is.
Internal	Chapter 3	Corrected the colors for recreational, scenic, and wild segments in legend for Figure 3-1.
Public	Chapter 3	Included a sidebar in Chapter 3 to highlight the difference between the Recreational ORVs and recreational classifications (segments), and the Scenic ORVs with scenic classifications (segments).
Public	Chapter 5	Updated the monitoring methodology for the Recreational ORV to clarify issues regarding monitoring intervals/schedule.
Internal	Chapter 5	Clarified references to the large wood management policy. The correct citation is "Yosemite Directive #31: Large Wood Management in the Merced Wild and Scenic River."
Internal	Chapter 5	Clarified baseline conditions for Recreational ORVs 19 & 20; revised management standard, adverse impact, and degradation definitions.
Internal	Chapter 5	Revised bare soil indicator triggers for Management Actions Table to reflect management concerns at Merced Lake East Meadow.
Internal	Chapter 5	Corrected reference from "Degradation is defined..." to say "Adverse impact is defined..."
Public	Chapter 5	Corrected page 5-21 of the DEIS that erroneously said WSRA "expressly provides for structures that are existing at the time of designation to remain." Though the law allows rivers that include manmade structures to be designated under WSRA, only those structures that do not adversely impact or degrade river values are permissible under WSRA.
Internal	Chapter 5	Clarified the condition, management standard, and management actions at Merced Lake East Meadow site.
Internal	Chapter 5	Reviewed and revised ORV 14 for consistency to ensure it is always described as including both the bridge and the hotel.
Internal	Chapter 5	Clarified management standards for ORV 10.
Internal	Chapter 5	Removed the vehicles-at-one-time indicator from Chapter 5 and moved to Chapter 6 as the user capacity management tool.
Public	Chapter 5	Included discussion of the management program for East Yosemite Valley in Chapter 6. Clarified that the increase in PAOT without an increase in VAOT is mainly from increased transit runs to the Valley. These calculations are included in Appendix S.
Public	Chapter 5	Added list of primary viewing areas and attraction sites to clarify Recreational ORV section of Chapter 5. Defined physical parameters of the viewing areas, trails and shore use areas.
Public	Chapter 6	Defined the word "location" in Table 5-39.
Public	Chapter 6	Clarified what is included in administrative use, including what elements fit into each of the categories.
Public	Chapter 6	Clarified how the capacity of the Valley relates to the density indicators in Chapter 5, and integrated this information into the larger discussion of capacity and capacity management in Chapter 6, Segment 2.
Public	Chapter 6	The parking inventories for the Cathedral Beach and Sentinel Beach picnic areas are included in the segment capacities in Chapter 6 and the parking counts in Chapter 8. These inventories account for both current endorsed parking and unendorsed parking and what will be endorsed in the future.
Public	Chapter 6	Included analysis of ORV impacts from user capacities in Chapter 6.

Source	Location	Correction or Clarification
Public	Chapter 6	Revised definition of user capacity to say, "The quantity of recreation use which an area can sustain without adverse impact on the outstandingly remarkable values and free-flowing character of the river area, the quality of the recreational experience, and public health and safety."
Public	Chapter 6	Labeled the units in Table 6-5 on page 6-27 as "people."
Internal	Chapter 6	Corrected document to reflect that the reason overnight use in Segment 8 is not permitted is because there is no camping allowed within one air mile of a road.
Public	Chapter 6	Due to the connected nature of use patterns in Yosemite Valley, housing in the Valley (both inside and outside the river corridor) must all be included. Chapter 6 very clearly states that administrative capacity includes NPS housing numbers.
Public	Chapter 6 and Appendix S	Defined the number of vehicles that are acceptable to have in circulation on Valley roads.
Public	Chapter 7	Separated Segments 2A and 2B in Development of Lands and Facilities tables in Chapter 7; revised Chapter 7 to indicate that West Valley segment is classified as "scenic" and not "recreational."
Public	Chapter 7	Added analysis of why it is not feasible to move many concessioner housing units outside the park and bus employees in each day.
Public and Internal	Chapter 8	Clarified regional transit runs: • All runs from Merced, Fresno, Sonora and Lee Vining are round trip. • Origin of service for the Highway 120 transit is Sonora, not Groveland. • Updated changes in transit service and seasonality of service in transit tables in all alternatives. • In Alternatives 2-6 there are no more shuttle runs between Wawona and Yosemite Valley due to the increase in transit runs on the Highway 41 corridor.
Public and Internal	Chapter 8	Revised Alternative 6 summary table to show that Sugar Pine Bridge is retained for the near term, but would be considered for removal only if engineering solutions proved after 10 years to not accomplish the restoration goals for free-flowing condition at this location.
Internal	Chapter 8	Clarified the language regarding demolition of a historic structure to describe this action as "destruction or damage" rather than "removal."
Public	Chapter 8	Detailed Merced Lake East Meadow grazing capacity in Alternatives 3, 5, and 6.
Internal	Chapter 8	Detailed pack stock limits to re-supply the Merced lake High Sierra Camp in Alternatives 3, 5, and 6.
Internal	Chapter 8	Revised Alternative 5 West Valley narrative maps to show correct scenic segment classification.
Internal	Chapter 8	Clarified that private boating is not allowed in Segment 6. Boating above Swinging Bridge on the South Fork is closed to vessels to protect the Wawona domestic water intake.
Internal	Chapter 8	Clarified language regarding the removal of units at Housekeeping Camp in Alternatives 4, 5, and 6. In Alternative 4, all units in areas of frequent inundation, including 34 units within the ordinary high-water mark, are removed. In Alternatives 5 and 6, only the 34 units within the ordinary high-water mark are removed.
Internal	Chapter 8	Corrected document to reflect that Alternative 2 does not have permitting for boats, but instead is monitored by a river patrol with expected use to be 25 people per day.
Internal	Chapter 8	Corrected document to read that the number of visitors to Yosemite Valley under Alternative 4 would be reduced overall; however, overnight use would slightly increase.
Public and Internal	Chapter 8	Parking in Yosemite Valley: • Included additional detail about how much of the current parking inventory is for administrative purposes. • Corrected to read that Yosemite Village Day-use Parking Area will have a total of 750 spaces under Alternative 5.
Internal	Chapter 8	Clarified that the El Portal Remote Parking Area would also be serviced by a shuttle during peak season, rather than only by regional transit.
Public	Chapter 8	Revised Alternative 5 (Preferred) map to show approximate footprint of proposed camping at Upper and Lower Rivers, which would be concentrated in previously disturbed areas and avoid the riparian buffer and wetland areas. Additional site design and compliance would be required prior to implementation of this action.

Source	Location	Correction or Clarification
Public	Chapter 8	Included discussion of how plan addresses the risk assessment within the rockfall hazard zone, specifically in the vicinity of the Curry Village Residential Area; two structures will no longer be used for employee housing, and the NPS will reduce the occupancy in three other dorms to reduce the overall risk metric to an acceptable level below 6.0. These actions are based on the Yosemite Geologic Hazard Guidelines developed in 2012. This rockfall hazard guidance was developed based on the peer reviewed report Quantitative Rock-fall Hazard and Risk Assessment for Yosemite Valley, Yosemite National Park, California (Stock et al. 2012) technical report.
Public	Chapter 8	In ORV20 for Alternatives 2-6, the enumeration of visitation and AOT capacity by type of user has been included. Regarding units, locations and timing, a more detailed description of how ORVs are related to capacities across the alternatives has been included in Chapter 6. Chapter 6 discusses how Alternative 5 (Preferred) will manage visitation through enhanced transportation systems and include an overall limit on vehicles so use will not grow beyond the established capacity.
Public	Chapters 8 and 9	Clarified that in Alternative 3, temporary housing at Lost Arrow is removed, and 50 administrative parking spaces are re-established.
Public	Chapter 9	Revised the Affected Environment portion of the socioeconomics section to include information for California residents and Yosemite region residents regarding population, income, employment and spending power (see Tables 9-162 through 9-167).
Public	Chapter 9	Revised visitor experience analysis to focus more specifically on relationship of visitor experiences to the park and river.
Public	Chapter 9	Cross-referenced to Chapter 5 discussion of ORVs 1 & 2 added to discussion of high- and mid-elevation meadow health in Chapter 9 discussion of natural condition of Segment 1 under Alternative 1.
Internal	Chapter 9	Added a discussion of potential cumulative impacts associated with the Camp Wawona project.
Public	Chapter 9	Segments 2A and 2B: • Provided an impact summary statement across all sections, as appropriate. • Evaluated impacts to natural and sociocultural resources between 2A and 2B separately.
Internal	Chapter 9	Revised air quality analysis to address comments from the Environmental Protection Agency.
Public	Chapter 9	Revised section to clarify that changes to facilities would be designed to protect river values, while maintaining many of the recreational opportunities that directly facilitate a visitor's ability to experience the park and the Merced River.
Public	Chapter 9	Corrected reference to cattle grazing in Segment 1 to explain that only pack stock grazing, not cattle grazing, occurs in Yosemite.
Internal	Chapter 9	Added discussion of displacement and commercial use allocation to each alternative.
Public	Chapter 9	Re-ran the economic impact model to account for the revisions to Alternative 5. All of the outputs to the modeling changed slightly, and in the process the numbers in Table 9-199 were corrected and updated.
Internal	Chapter 9	Removed incorrect reference to historic bridges as being built by the Civilian Conservation Corps (CCC) from Historic Properties section.
Public	Appendix A	The GMP Amendment Appendix A includes strike-through and replacement text for any references to the exclusion of private vehicle access.
Internal	Appendix J	Improved consistency in assessment of adverse effects for properties that require additional analysis. Added additional description regarding the eligibility of each resource and historic significance. Clearly identified *potential* historic properties in the assessment of effect, particularly properties proposed for removal at Yosemite Lodge and Housekeeping. Applied additional criteria for potential significance of archeological resources (Criterion A and C). Further clarified how resources (especially archeological) would be protected under each action.
Internal	Appendix J	Clarified use of the word "removal" in relation to historic properties. The DEIS used the word "removal" to describe demolition, archaeological excavation, and the moving of buildings or structures. Section 106 regulations describe demolition and archeological excavation as "destruction or damage" and use "removal" only to mean moving of buildings and structures. FEIS clarifies and corrects use of this terminology.
Internal	Appendix L	Deleted text regarding filming at the top of page 6, which was a copy/paste error.

7.0 SUBSTANTIVE COMMENTS BY ISSUE AREA INDEX

Legal Framework and Planning Process **P-9**

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APPENDIX Q

GENERAL CONFORMITY DETERMINATION

1. INTRODUCTION TO THE PROPOSED ACTION

The *Merced Wild and Scenic River Comprehensive Management Plan* (referred to as the *Merced River Plan* in this determination analysis*)* will be the guiding document for protecting and enhancing river values and managing use within the Merced River corridor in Yosemite National Park for the next 20 years. The draft plan includes specific actions to correct resource impacts, establishes numerical limits on the kinds and amounts of use allowed in the river corridor, and features an expanded monitoring program to protect and enhance river values and visitor experiences over time.

2. GENERAL CONFORMITY REGULATORY BACKGROUND

The EPA promulgated the General Conformity Rule on November 30, 1993 in Volume 58 of the Federal Register (58 FR 63214) to implement the conformity provision of Title I, section 176(c)(1) of the Clean Air Act (CAA). Section 176(c)(1) requires that the Federal government not engage in, support, or provide financial assistance for licensing, permitting, or approving any activity not conforming to an approved CAA implementation plan. The approved implementation plan could be a Federal, State, or Tribal Implementation Plan (i.e., FIP, SIP, or TIP).

The General Conformity Rule is codified in Title 40 of the Code of Federal Regulations (CFR) Part 51, Subpart W and Part 93, Subpart B, "Determining Conformity of General Federal Actions to State or Federal Implementation Plans." The General Conformity Rule applies to all Federal actions except highway and transit programs. The latter must comply with the conformity requirements for transportation plans in 40 CFR Part 93, Subpart A.

2.1 General Conformity Requirements

Areas of the country that do not meet the National Ambient Air Quality Standards (NAAQS) for any pollutant are designated by the EPA as "nonattainment areas." Areas that were once designated nonattainment, but are now achieving the NAAQS are termed "maintenance areas." Areas which have air pollution levels below the NAAQS are termed "attainment areas." In nonattainment areas, states must develop plans to reduce emissions and bring the area back into attainment of the NAAQS. The General Conformity Rule ensures that the actions taken by federal agencies in nonattainment and maintenance areas do not interfere with a state's plans to meet national standards for air quality. Established under the Clean Air Act (section 176(c)(4)), the General Conformity Rule plays an important role in helping states improve air quality in those areas that do not meet the NAAQS. Under the General Conformity Rule, federal agencies must work with State and local governments in a nonattainment or maintenance area to ensure that federal actions conform to the air quality plans established in the applicable state implementation plan. The purpose of the General Conformity Rule is to:

- Ensure that federal activities do not cause or contribute to new violation of NAAQS;

- Ensure that actions do not cause additional or worsen existing violations of or contribute to new violations the NAAQS; and
- Ensure that attainment of the NAAQSs is not delayed.

Implementation of the existing General Conformity Regulations falls into three phases: applicability analysis, conformity determination, and review process. Only actions which cause emissions in designated nonattainment and maintenance areas are subject to the regulations. In addition, the regulations recognize that the vast majority of federal actions do not result in a significant increase in emissions and, therefore, include a number of exemptions the most predominantly implemented of which is the de minimis emission levels based on the type and severity of the nonattainment problem. If the action will cause emissions above the de miminis in any nonattainment or maintenance area and the action is not otherwise exempt, "presumed to conform," or included in the existing emissions budget of the SIP, the agency must conduct a conformity determination before it takes the action.

When the applicability analysis shows that the action must undergo a conformity determination, federal agencies must first show that the action will meet all SIP control requirements such as reasonably available control measures, and the emissions from the action will not cause a new violation of the standard, or interfere with the timely attainment of the standard, the maintenance of the standard, or the area's ability to achieve an interim emission reduction milestone. Federal agencies then must demonstrate conformity by meeting one or more of the methods specified in the regulation for determining conformity:

1. Demonstrating that the total direct and indirect emissions are specifically identified and accounted for in the applicable SIP,
2. Obtaining a written statement from the state, tribe or local agency responsible for the SIP documenting that the total direct and indirect emissions from the action along with all other emissions in the area will not exceed the SIP emission budget,
3. Obtaining a written commitment from the state or tribe to revise the SIP to include the emissions from the action,
4. Obtaining a statement from the metropolitan planning organization (MPO) for the area documenting that any on-road motor vehicle emissions are included in the current regional emission analysis for the area's transportation plan or transportation improvement program,
5. Fully offsetting the total direct and indirect emissions by reducing emissions of the same pollutant or precursor in the same nonattainment or maintenance area, or
6. Conducting air quality modeling that demonstrates that the emissions will not cause or contribute to new violations of the standards, or increase the frequency or severity of any existing violations of the standards.

As public bodies, federal agencies must make their conformity determinations through a public process. The General Conformity Regulations require federal agencies to provide notice of the draft determination to the applicable EPA Regional Office, the state and local air quality agencies, the local MPO and, where applicable, the Federal Land Manager. In addition, the regulations require federal agencies to provide at least a 30-day comment period on the draft determination and make the final determination public. State agencies and the public can appeal the final determination in the U.S. Courts system. Failure by a federal agency to follow the substantive and procedural General Conformity requirements can result in an adverse court decision if challenged.

2.2 General Conformity Applicability

The *Merced River Plan* would generate emissions associated with construction and operations in the Yosemite National Park, an area where the EPA has jurisdiction over air emissions. The portion of the South Fork Merced River corridor within Yosemite National Park crosses into both Mariposa and Madera counties, which are located in the Mountain Counties Air Basin (MCAB) and the San Joaquin Valley Air Basin (SJVAB), respectively. The MCAB has been designated as marginal nonattainment for the federal ozone standard. The SJVAB has also been designated as nonattainment for the federal ozone standard, as well as the PM2.5 standard. Madera County is also designated attainment/maintenance for the federal PM10 standard. The CAA requires nonattainment areas to develop plans, known as State Implementation Plans (SIPs). SIPs are comprehensive plans that describe how an area will attain NAAQS. The 1990 amendments to the federal CAA set deadlines for attainment based on the severity of an area's air pollution problem.

Actions that would occur under the *Merced River Plan* in the Mariposa County portion of the MCAB would be subject to the following federal General Conformity Rule de minimis thresholds:

- 100 tons per year VOC or ROG
- 100 tons per year NOx

Actions that would occur under the *Merced River Plan* in the Madera County portion of the SJVAB would be subject to the following federal General Conformity Rule de minimis thresholds:

- 10 tons per year VOC or ROG
- 10 tons per year NOx
- 100 tons per year PM2.5
- 100 tons per year PM10

Notably, only one action — reroute Triple Peak Fork Trail upland where possible — would occur in Madera County. This action would result in negligible emissions and would not exceed de minimis thresholds. The majority of activities included in the *Merced River Plan* would occur in Mariposa County. Construction and operational emissions in Mariposa County are analyzed in greater detail below.

3. ASSESSMENT OF CONFORMITY EMISSIONS

Emission sources resulting from the Proposed Action would include the following:

- **Construction Sources.** These include emissions from off-road construction equipment (i.e., loaders, compactors, trenchers, cranes, etc), on-road vehicles (i.e., workers and material delivery trucks), and ROG off-gassing associated with asphalt paving.
- **Operational Sources.** These include emissions from on-road vehicles, such as visitors and buses.

The Proposed Action would generate criteria air pollutant emissions from a variety of different sources. The National Park Service (NPS) developed a worse-case annual construction scenario, with construction activities starting in year 2017 and lasting through part of the year 2018. For operational emissions, build-out annual emissions are included. This analysis presents a conservative scenario in comparison to the de minimis thresholds since it sums the worse-case annual construction and operational emissions, even

though the worse-case construction and operational emissions would not occur on the same year. All of the emissions sources associated with the Proposed Action activities in Mariposa County would generate emissions of NOx and ROG in an air basin designated as marginal nonattainment for ozone NAAQS. Consequently, these emissions must be evaluated with respect to the General Conformity process to determine the potential for adverse impacts related to air quality.

3.1 Construction Emissions

According to information provided by the NPS, the worse-case annual construction scenario would include the following construction activities: Boys Town Guest Lodging (Phases 2 and 3); Remodel Concessioner Warehouse (Phase 2); Realign Northside Drive, Sentinel Drive Roundabout, etc.; Yosemite Village Day Use Parking Area (Phases 1 and 2); Remodel Village Sport Shop to Visitor Contact Station; Yosemite Lodge Pedestrian Underpass and Roadwork (Phase 1); Camp 4 Parking, Comfort Station and Trailhead; El Capitan Meadow Boardwalk; Camp 6 Day-Shuttle Stops and Pedestrian Pathways; Demolish Existing Concessioner GO; Yosemite Village Day Use Comfort Station Trailhead; Yosemite Lodge Shuttle Stop and Pathways (Phase 2); and the Yosemite Lodge Parking Lot (Phase 1).

Construction exhaust emissions of criteria air pollutants were estimated based on off-road equipment lists, on-road vehicle trip information, and acres to be paved assumptions provided by the NPS for the construction activities described above. This information was then combined with emission factors applicable to each source type to generate criteria pollutant emission estimates. Emission factors for construction equipment were taken from the California Air Resources Board (CARB) OFFROAD 2007 model and updated for consistency with the *Staff Report: Initial Statement of Reasons for Proposed Rulemaking – Proposed Amendments to the Regulation Off-road Large Spark-ignition Fleet Requirements* (CARB, 2010). On-road vehicle emissions for construction were based on the following data: numbers and types of vehicles (worker vehicles, equipment delivery trucks) and number of trips and trip distances anticipated for these vehicles. Vehicle emission factors were taken from the CARB's EMFAC 2011. For annual acres paved and ROG off-gassing, the default emission factor of 2.62 pounds of ROG per acre (as included in the South Coast Air Quality Management District (SCAQMD) CalEEMod model) was incorporated into the construction emissions calculation. The worse-case annual construction emissions are included in Table 1 below for comparison to the General Conformity Rule de minimis thresholds. Further details on the methodology and assumptions used for assessing construction emissions are provided in Attachment A.

3.2 Operational Emissions

Operational air pollutant emissions modeled were for on-road mobile emissions (visitors and buses) at buildout of the Preferred Alternative (Alternative 5) and were quantified in the *Merced River Plan DEIS* using EMFAC2007 emission factors and vehicle-miles travelled (VMT) information provided by the NPS. Notably, the Preferred Alternative operations would result in reduced total daily visitor and administrative use and capacity and increased bus usage in comparison to the No Action Alternative.

TABLE 1: CONSTRUCTION AND OPERATIONS CRITERIA AIR POLLUTANT EMISSIONS FOR THE PREFERRED ALTERNATIVE (TONS/YEAR)[a]

Annual Scenario	NOx	ROG
Construction Emissions	7	0.5
Preferred Alternative Operational Emissions	23	25
No Action Alternative Operational Emissions	22	26
Incremental Change[b]	8	(0.5)
Federal General Conformity Threshold[c]	100	100
Exceed Threshold (Yes or No)?	No	No

[a] Construction emissions were calculated using OFFROAD2007 and EMFAC2011 factors. Operational emissions were calculated using EMFAC2007 factors and assume 2.4 visitors per car with approximately 22 VMT per vehicle (calibrated based on annual VMT projected for the No Action Alternative assuming 240 days/year peak and shoulder seasons) and bus trip VMT from *Supporting Information: A Life-Cycle Greenhouse Gas Inventory for Yosemite National Park* (Villalba et al 2012). Specific assumptions and emission factors incorporated into the calculations are included in Attachment A. These emissions represent those that would be generated in Mariposa County. Actions and associated emissions in Madera County would be negligible and were not estimated.
[b] Values in (parentheses) are net reductions with respect to the No Action Alternative emissions.
[c] Federal General Conformity thresholds for the Mariposa County portion of the MCAB.

Table 1 presents an estimate of the totality of air emissions of ROG and NOx that would occur as a result of the Preferred Alternative and the worse-case annual construction scenario. Emissions are totaled in terms of tons per year for comparison to de minimis thresholds for the purposes of general conformity assessment. As can be seen from the data in Table 1, emissions of ozone precursors (NOx and ROG) from the Proposed Action would be below de minimis thresholds for Mariposa County in the MCAB (100 tons per year).

4. GENERAL CONFORMITY DETERMINATION

Emissions of ROG and NOx generated by both construction and operation of the Proposed Action would be less than de minimis thresholds that apply to the MCAB for these pollutants in a non-attainment area. Therefore, the *Merced River Plan* would generate emissions that are less than the general conformity de minimis thresholds and would be considered to conform to the SIP. Notably, although the Proposed Action would generate emissions in the Madera County portion of the SJVAB, as noted above in Section 2.2, those emissions would be negligible and would not exceed the ROG, NOx, PM2.5, or PM10 de minimis thresholds that apply to the SJVAB.

5. CONCLUSION

Based on the information and analysis presented above, emissions of ozone precursors in the MCAB and SJVAB and PM10 and PM2.5 in the SJVAB would be below the de minimis thresholds established in Title 40 of the CFR, Part 51.853 (b) (1). Therefore, emissions associated with the *Merced River Plan* would conform to the California SIP implemented pursuant to the CAA and a detailed conformity analysis is not required.

6. REFERENCES

California Air Resources Board (CARB)

2010 *Staff Report: Initial Statement of Reasons for Proposed Rulemaking – Proposed Amendments to the Regulation Off-road Large Spark-ignition Fleet Requirements*, October 2010.

Villalba, G., L. Tarnay, E. Campbell, and X. Gabarrell

2012 *Supporting Information: A Life Cycle Greenhouse Gas Inventory for Yosemite National Park*.

ATTACHMENT A
SUPPORTING DOCUMENTATION

FY 2017 Major Capital Improvement Construction Operations

Operation	Area	Duration	Equipment 1				Equipment 2				Equipment 3				Equipment 4				Equipment 5				Crew Size	Material Delivery
	(Acres)	(Days)	Amount (EA)	Power (hp)	Use (%)	Total Hrs	Number (EA)	Power (hp)	Use (%)	Total Hrs	Number (EA)	Power (hp)	Use (%)	Total Hrs	Number (EA)	Power (hp)	Use (%)	Total Hrs	Number (EA)	Power (hp)	Use (%)	Total Hrs	(EA)	(Loads)
Boys Town Guest Lodging (PHASE 2: Construction)																								
Clearing, Site Grading, Pad Prep	Major Site Work completed as Phase 1 in FY2016																							
Foundation Excavation/Backfill		45	Track Excavator				Backhoe Loader				Wheel Loader				Water Truck				Vibrating Plate Compactor or Tamper				8	45
			1	90	50%	180	1	75	50%	180	1	150	30%	108	1	300	10%	36	1	5	20%	72		
Foundation Construction		45	Concrete Pump				Generator				Wheel Loader				Service Truck								8	45
			1	70	25%	90	1	10	50%	180	1	150	10%	36	1	300	5%	18						
Pre-Fabricated Module Erection - Closest Factories, Bend OR - 605 Miles; Phoenix AZ- 680 Miles (643 mi average)		30	Hydraulic Crane				Generator				Wheel Loader				Service Truck								10	60
			1	300	50%	120	1	10	25%	60	1	150	10%	24	1	300	5%	12						
Exterior Closure/Carpentry		22	Generator				Service Truck				Forklift/Skytrack												3	10
			1	10	50%	88	1	300	5%	9	1	100	5%	9										
Field Roof Installation		60	Generator				Service Truck				Conveyor/Hoist												5	20
			1	10	75%	360	1	300	5%	24	1	100	5%	24										
Interior Carpentry		60	Generator				Service Truck																3	5
			1	10	50%	240	1	300	5%	24														
Mechanical/Electrical/Plumbing Tie ins/Finish		44	Service Truck				Backhoe Loader				Vibrating Plate Compactor or Tamper												3	10
			1	300	5%	18	1	75	10%	35	1	5	20%	70										
Painting		60	Service Truck																				8	3
			1	300	5%	24																		
Tile, Carpet, Misc. Finishes, etc.		60	Service Truck				Generator																3	30
			1	300	5%	24	1	10	20%	96														
Furnishings, Fixtures & Equipment		20	Service Truck																				3	30
			1	300	5%	8																		
Site walkways, hardscape etc.		45	Skid Steer Loader				Service Truck				Landscape Tractor/Loader				24"-36" Walk Behind Compactor				Vibrating Plate Compactor or Tamper				8	10
			1	60	50%	180	1	300	20%	72	1	90	30%	108	1	10	25%	90	1	5	20%	72		
Landscaping		45	Skid Steer Loader				Landscape Tractor/Loader				Service Truck				Water Truck				Trencher				10	10
			1	60	20%	72	1	90	50%	180	1	300	20%	72	1	300	10%	36	1	30	20%	72		
Remodel Concessioner Warehouse (Phase 2)																								
Interior Carpentry		45	Service Truck				Forklift/Skytrack																7	5
			2	300	10%	72	1	100	10%	36														
Mechanical/Electrical/Plumbing Tie ins/Finish		30	Service Truck																				3	5
			1	300	5%	12																		
Painting		20	Service Truck																				4	2
			1	300	5%	8																		
Tile, Carpet, Misc. Finishes, etc.		20	Service Truck																				3	5
			1	300	5%	8																		
Furnishings, Fixtures & Equipment		7	Service Truck																				3	10
			1	300	5%	3																		
Realign Northside Drive, Sentinel Dr. Roundabout, etc.																								
Clear & Grub, Grading, Prep New Alignment		15	Elevating Scraper				Motor Grader 12'				Water Truck				Crawler Tractor D6 Class Bulldozer				Self Propelled Compactor				10	10
			2	200	100%	240	1	190	100%	120	2	300	100%	240	1	150	60%	72	1	240	100%	120		
Rotomill Existing Pavement		5	Reclaimer Stabilizer				Water Truck				Skid Steer Loader				Wheel Loader				10 Wheel Dump Truck 50,000 GVW				10	5
			1	360	100%	40	1	300	100%	40	1	60	75%	30	1	150	100%	40	4	350	100%	160		
Road Subrade Prep & Roadbase work		15	Elevating Scraper				Motor Grader 12'				Water Truck				66" Smooth Drum Vibratory Compactor				36"-48" Ride on Compactor				10	30
			1	200	25%	30	1	190	100%	120	2	300	100%	240	1	80	100%	120	1	10	25%	30		
Asphalt Paving & Roadwork -		8	Motor Grader 12'				Asphalt Spreader				Dual Drum Breakdown Roller				Finish Roller				36"-48" Ride on Roller				12	20
			1	190	20%	13	1	150	80%	51	1	140	80%	51	1	90	80%	51	1	15	50%	32		
Landscaping		15	Skid Steer Loader				Landscape Tractor/Loader				Service Truck				Water Truck				Trencher				10	5
			1	60	20%	24	1	90	50%	60	1	300	20%	24	1	300	10%	12	1	30	20%	24		
Yosemite Village Day Use Parking Area (Phase 1 Construction)																								
Clearing, Site Grading		30	Elevating Scraper				Motor Grader 12'				Water Truck				Crawler Tractor D6 Class Bulldozer				Self Propelled Compactor				10	10
			2	200	100%	480	1	190	100%	240	2	300	100%	480	1	150	60%	144	1	240	100%	240		
Parking Lot & Road Subrade Prep & Roadbase work		5	Elevating Scraper				Motor Grader 12'				Water Truck				66" Smooth Drum Vibratory Compactor				36"-48" Ride on Compactor				10	30
			1	200	25%	10	1	190	100%	40	2	300	100%	80	1	80	100%	40	1	10	25%	10		
Asphalt Paving & Roadwork - Note, parking areas are not paved		2	Motor Grader 12'				Asphalt Spreader				Dual Drum Breakdown Roller				Finish Roller				36"-48" Ride on Roller				12	20
			1	190	20%	3	1	150	80%	13	1	140	80%	13	1	90	80%	13	1	15	50%	8		
Site walkways, hardscape etc.		5	Skid Steer Loader				Service Truck				Landscape Tractor/Loader				24"-36" Walk Behind Compactor								8	10
			1	60	50%	20	1	300	20%	8	1	90	30%	12	1	10	25%	10						
Landscaping		5	Skid Steer Loader				Landscape Tractor/Loader				Service Truck				Water Truck				Trencher				10	10
			1	60	20%	8	1	90	50%	20	1	300	20%	8	1	300	10%	4	1	30	20%	8		
Remodel Village Sport Shop to Visitor Contact Station																								
Interior Demolition		10	Service Truck				Bob Tail Dump Truck 25,000 GVW																6	2
			1	300	10%	8	1	200	10%	8														
Interior Carpentry		10	Service Truck																				7	2
			2	300	10%	16																		
Mechanical/Electrical/Plumbing Tie ins/Finish		5	Service Truck																				3	2
			1	300	10%	4																		
Painting		5	Service Truck																				4	1
			1	300	10%	4																		
Tile, Carpet, Misc. Finishes, etc.		5	Service Truck																				3	1
			1	300	10%	4																		
Furnishings, Fixtures & Equipment		3	Service Truck																				3	3
			1	300	10%	2																		
Yosemite Lodge Pedestrian Underpass,and Roadwork (Phase 1 Construction)																								
Clear & Grub, Grading,		5	Elevating Scraper				Motor Grader 12'				Water Truck				Crawler Tractor D6 Class Bulldozer				Self Propelled Compactor				10	7
			2	200	100%	80	1	190	100%	40	2	300	100%	80	1	150	60%	24	1	240	100%	40		
Foundation Excavation/Backfill		5	Track Excavator				Backhoe Loader				Wheel Loader				Water Truck				Skid Steer Loader				8	5
			1	90	50%	20	1	75	50%	20	1	150	30%	12	1	300	10%	4	1	60	50%	20		
Foundation/Box Culvert Construction		45	Concrete Pump				Generator				Wheel Loader				Service Truck				Forklift/Skytrack				8	20
			1	70	10%	36	1	10	50%	180	1	150	10%	36	1	300	10%	36	1	100	10%	36		
Rotomill Existing Pavement		3	Reclaimer Stabilizer				Water Truck				Skid Steer Loader				Wheel Loader				10 Wheel Dump Truck 50,000 GVW				10	5
			1	360	100%	24	1	300	100%	24	1	60	75%	18	1	150	100%	24	4	350	100%	96		

Operation	Area	Duration	Equipment 1				Equipment 2				Equipment 3				Equipment 4				Equipment 5				Crew Size	Material Delivery
	(Acres)	(Days)	Amount (EA)	Power (hp)	Use (%)	Total Hrs	Number (EA)	Power (hp)	Use (%)	Total Hrs	Number (EA)	Power (hp)	Use (%)	Total Hrs	Number (EA)	Power (hp)	Use (%)	Total Hrs	Number (EA)	Power (hp)	Use (%)	Total Hrs	(EA)	(Loads)
Road Subrade Prep & Roadbase work		4	Elevating Scraper				Motor Grader 12'				Water Truck				66" Smooth Drum Vibratory Compactor				36"-48" Ride on Compactor				10	20
			1	200	25%	8	1	190	100%	32	2	300	100%	64	1	80	100%	32	1	10	25%	8		
Asphalt Paving & Roadwork		4	Motor Grader 12'				Asphalt Spreader				Dual Drum Breakdown Roller				Finish Roller				36"-48" Ride on Roller				12	10
			1	190	20%	6	1	150	80%	26	1	140	80%	26	1	90	80%	26	1	15	50%	16		
Site walkways, hardscape etc.		5	Skid Steer Loader				Service Truck				Landscape Tractor/Loader				24"-36" Walk Behind Compactor				Vibrating Plate Compactor or Tamper				8	10
			1	60	50%	20	1	300	20%	8	1	90	30%	12	1	10	25%	10	1	5	20%	8		
Landscaping		5	Skid Steer Loader				Landscape Tractor/Loader				Service Truck				Water Truck				Trencher				10	10
			1	60	20%	8	1	90	50%	20	1	300	20%	8	1	300	10%	4	1	30	20%	8		
Camp 4 Parking, Comfort Station & Trailhead																								
Clear & Grub, Grading, Site Prep		5	Elevating Scraper				Motor Grader 12'				Water Truck				Crawler Tractor D6 Class Bulldozer				Self Propelled Compactor				10	5
			2	200	100%	80	1	190	100%	40	2	300	100%	80	1	150	60%	24	1	240	100%	40		
Foundation Excavation/Backfill		4	Track Excavator				Backhoe Loader				Wheel Loader				Water Truck				Vibrating Plate Compactor or Tamper				8	3
			1	90	50%	16	1	75	50%	16	1	150	30%	10	1	300	10%	3	1	5	20%	6		
Foundation Construction		5	Concrete Pump				Generator				Wheel Loader				Service Truck								8	5
			1	70	25%	10	1	10	50%	20	1	150	10%	4	1	300	5%	2						
Exterior Closure/Carpentry		15	Generator				Service Truck				Forklift/Skytrack												3	3
			1	10	50%	60	1	300	5%	6	1	100	10%	12										
Field Roof Installation		5	Generator				Service Truck				Conveyor/Hoist												5	2
			1	10	75%	30	1	300	5%	2	1	100	5%	2										
Interior Carpentry		15	Generator				Service Truck																3	2
			1	10	50%	60	1	300	5%	6														
Mechanical/Electrical/Plumbing Tie ins/Finish		15	Service Truck				Backhoe Loader																3	4
			1	300	5%	6	1	75	10%	12														
Painting		10	Service Truck																				3	1
			1	300	5%	4																		
Tile, , Misc. Finishes, etc.		10	Service Truck				Generator																3	1
			1	300	5%	4	1	10	20%	16														
Furnishings, Fixtures & Equipment		2	Service Truck																				3	1
			1	300	5%	1																		
Parking Lot & Road Subrade Prep & Roadbase work		5	Elevating Scraper				Motor Grader 12'				Water Truck				66" Smooth Drum Vibratory Compactor				36"-48" Ride on Compactor				10	10
			1	200	25%	10	1	190	100%	40	2	300	100%	40	1	80	100%	40	1	10	25%	10		
Site walkways, hardscape etc.		5	Skid Steer Loader				Service Truck				Landscape Tractor/Loader				24"-36" Walk Behind Compactor				Vibrating Plate Compactor or Tamper				8	10
			1	60	50%	20	1	300	20%	8	1	90	30%	12	1	10	25%	10	1	5	20%	8		
Landscaping		5	Skid Steer Loader				Landscape Tractor/Loader				Service Truck				Water Truck				Trencher				10	10
			1	60	20%	8	1	90	50%	20	1	300	20%	8	1	300	10%	4	1	30	20%	8		
El Capitan Meadow Boardwalk																								
Foundation Pier Drilling		4	Backhoe Loader w/Auger attachment				Skid Steer Loader				Hand Held Post Hole Auger				Generator				Bob Tail Dump Truck 25,000 GVW				5	3
			1	75	25%	8	1	60	25%	8	1	5	50%	16	1	10	20%	6	1	200	25%	8		
Foundation Pier Construction		5	Concrete Pump				Generator				Skid Steer Loader				Service Truck								5	3
			1	70	25%	10	1	10	50%	20	1	60	25%	10	1	300	5%	2						
Boardwalk Carpentry		15	Generator				Service Truck				Skid Steer Loader												3	3
			1	10	70%	84	1	300	10%	12	1	60	25%	30										
Trail/shoulder tie ins, Clean-up, etc.		3	Skid Steer Loader				Service Truck				Landscape Tractor/Loader				Water Truck				Vibrating Plate Compactor or Tamper				8	2
			1	60	50%	12	1	300	20%	5	1	90	30%	7	1	300	10%	2	1	5	20%	5		
Landscaping Repairs, Tie-ins etc.		2	Skid Steer Loader				Landscape Tractor/Loader				Service Truck				Water Truck								10	5
			1	60	20%	3	1	90	50%	8	1	300	20%	3	1	300	10%	2						

FY 2018 Major Capital Improvement Construction Operations

Operation	Area	Duration	Equipment 1				Equipment 2				Equipment 3				Equipment 4				Equipment 5				Crew Size	Material Delivery
	(Acres)	(Days)	Amount (EA)	Power (hp)	Use (%)	Total Hrs	Number (EA)	Power (hp)	Use (%)	Total Hrs	Number (EA)	Power (hp)	Use (%)	Total Hrs	Number (EA)	Power (hp)	Use (%)	Total Hrs	Number (EA)	Power (hp)	Use (%)	Total Hrs	(EA)	(Loads)
Boys Town Guest Lodging (PHASE 3: Construction)																								
Clearing, Site Grading, Pad Prep		15	Elevating Scraper				Motor Grader 12'				Water Truck				Crawler Tractor D6 Class Bulldozer				Self Propelled Compactor				10	10
			2	200	100%	240	1	190	100%	120	2	300	100%	120	1	150	60%	72	1	240	100%	120		
Parking Lot & Road Subrade Prep & Roadbase work		10	Elevating Scraper				Motor Grader 12'				Water Truck				66" Smooth Drum Vibratory Compactor				36"-48" Ride on Compactor				10	30
			1	200	25%	20	1	190	100%	80	2	300	100%	160	1	80	100%	80	1	10	25%	20		
Asphalt Paving & Roadwork - Note, parking areas are not paved		4	Motor Grader 12'				Asphalt Spreader				Dual Drum Breakdown Roller				Finish Roller				36"-48" Ride on Roller				12	20
			1	190	20%	6	1	150	80%	26	1	140	80%	26	1	90	80%	26	1	15	50%	16		
Foundation Excavation/Backfill		60	Track Excavator				Backhoe Loader				Wheel Loader				Water Truck			0	Vibrating Plate Compactor or Tamper				8	60
			1	90	50%	240	1	75	50%	240	1	150	30%	144	1	300	10%	48	1	5	20%	96		
Foundation Construction		60	Concrete Pump				Generator				Wheel Loader				Service Truck								8	90
			1	70	25%	120	1	10	50%	240	1	150	10%	48	1	300	5%	24						
Pre-Fabricated Module Erection - Closest Factories, Bend OR - 605 Miles; Phoenix AZ- 680 Miles (643 mi average)		45	Hydraulic Crane				Generator				Wheel Loader				Service Truck								10	90
			1	300	50%	180	1	10	25%	90	1	150	10%	36	1	300	5%	18						
Exterior Closure/Carpentry		30	Generator				Service Truck				Forklift/Skytrack												3	10
			1	10	50%	120	1	300	5%	12	1	100	10%	24										
Field Roof Installation		90	Generator				Service Truck				Conveyor/Hoist												5	20
			1	10	75%	540	1	300	5%	36	1	100	10%	72										
Interior Carpentry		60	Generator				Service Truck																3	5
			1	10	50%	240	1	300	5%	24														
Mechanical/Electrical/Plumbing Tie ins/Finish		60	Service Truck				Backhoe Loader																3	20
			1	300	5%	24	1	75	10%	48														
Painting		120	Service Truck																				3	3
			1	300	5%	48																		
Tile, Carpet, Misc. Finishes, etc.		120	Service Truck				Generator																3	30
			1	300	5%	48	1	10	20%	192														
Furnishings, Fixtures & Equipment		30	Service Truck																				3	30
			1	300	5%	12																		
Site walkways, hardscape etc.		45	Skid Steer Loader				Service Truck				Landscape Tractor/Loader				24"-36" Walk Behind Compactor								12	20
			1	60	80%	288	1	300	20%	72	1	90	50%	180	1	10	50%	180						
Landscaping		30	Skid Steer Loader				Landscape Tractor/Loader				Service Truck				Water Truck				Trencher				10	10
			1	60	20%	48	1	90	50%	120	1	300	20%	48	1	300	10%	24	1	30	20%	48		
Camp 6 Day-Shuttle Stops & Pedestrian Pathways																								
Foundation Excavation/Backfill		4	Backhoe Loader				Skid Steer Loader				Wheel Loader				Water Truck				Bob Tail Dump Truck 25,000 GVW				5	3
			1	75	50%	16	1	60	80%	26	1	150	20%	6	1	300	10%	3	1	200	20%	6		
Foundation Construction		5	Concrete Pump				Generator				Wheel Loader				Service Truck								5	2
			1	70	25%	10	1	10	50%	20	1	150	10%	4	1	300	5%	2						
Exterior Closure/Carpentry		3	Generator				Service Truck				Forklift/Skytrack												3	1
			1	10	50%	12	1	300	5%	1	1	100	10%	2										
Field Roof Installation		2	Generator				Service Truck				Conveyor/Hoist												5	1
			1	10	75%	12	1	300	5%	1	1	100	5%	1										
Site walkways, hardscape etc.		20	Skid Steer Loader				Service Truck				Landscape Tractor/Loader				24"-36" Walk Behind Compactor								12	20
			1	60	80%	128	1	300	20%	32	1	90	50%	80	1	10	50%	80						
Landscaping		20	Skid Steer Loader				Landscape Tractor/Loader				Service Truck				Water Truck				Trencher				10	10
			1	60	20%	32	1	90	50%	80	1	300	20%	32	1	300	10%	16	1	30	20%	32		
Demolish Existing Concesioner GO																								
Building Demolition		5	Track Excavator				Crawler Loader				Skid Steer Loader				10 Wheel Dump Truck 50,000 GVW				Water Truck				6	5
			1	90	50%	20	1	130	100%	40	1	60	50%	20	3	350	100%	40	1	300	30%	12		
Misc. Site Demolition & Grading		2	Crawler Loader				Skid Steer Loader				10 Wheel Dump Truck 50,000 GVW				Water Truck				36"-48" Ride on Compactor				6	2
			1	130	100%	16	1	60	50%	8	2	350	100%	32	1	300	100%	16	1	10	25%	4		
Yosemite Village Day Use Parking Area (Phase 2 Construction)																								
Clearing, Site Grading		10	Elevating Scraper				Motor Grader 12'				Water Truck				Crawler Tractor D6 Class Bulldozer				Self Propelled Compactor				10	10
			2	200	100%	160	1	190	100%	80	2	300	100%	160	1	150	60%	48	1	240	100%	80		
Parking Lot & Road Subrade Prep & Roadbase work		15	Elevating Scraper				Motor Grader 12'				Water Truck				66" Smooth Drum Vibratory Compactor				36"-48" Ride on Compactor				10	30
			1	200	25%	30	1	190	100%	120	2	300	100%	240	1	80	100%	120	1	10	25%	30		
Asphalt Paving & Roadwork - Note, parking areas are not paved		5	Motor Grader 12'				Asphalt Spreader				Dual Drum Breakdown Roller				Finish Roller				36"-48" Ride on Roller				12	20
			1	190	20%	8	1	150	80%	32	1	140	80%	32	1	90	80%	32	1	15	50%	20		
Site walkways, hardscape etc.		22	Skid Steer Loader				Service Truck				Landscape Tractor/Loader				24"-36" Walk Behind Compactor				Vibrating Plate Compactor or Tamper				8	10
			1	60	50%	88	1	300	20%	35	1	90	30%	53	1	10	25%	44	1	5	20%	35		
Landscaping		22	Skid Steer Loader				Landscape Tractor/Loader				Service Truck				Water Truck				Trencher				10	10
			1	60	20%	35	1	90	50%	88	1	300	20%	35	1	300	10%	18	1	30	20%	35		
Yosemite Village Day Use Comfort Station Trailhead																								
Foundation Excavation/Backfill		4	Track Excavator				Backhoe Loader				Wheel Loader				Water Truck				Vibrating Plate Compactor or Tamper				8	3
			1	90	50%	16	1	75	50%	16	1	150	30%	10	1	300	10%	3	1	5	20%	6		
Foundation Construction		5	Concrete Pump				Generator				Wheel Loader				Service Truck								8	5
			1	70	25%	10	1	10	50%	20	1	150	10%	4	1	300	5%	2						
Exterior Closure/Carpentry		15	Generator				Service Truck				Forklift/Skytrack												3	3
			1	10	50%	60	1	300	5%	6	1	100	10%	12										
Field Roof Installation		5	Generator				Service Truck				Conveyor/Hoist												5	2
			1	10	75%	30	1	300	5%	2	1	100	5%	2										
Interior Carpentry		15	Generator				Service Truck																3	2
			1	10	50%	60	1	300	5%	6														
Mechanical/Electrical/Plumbing Tie ins/Finish		15	Service Truck				Backhoe Loader																3	4
			1	300	5%	6	1	75	10%	12														
Painting		10	Service Truck																				3	1
			1	300	5%	4																		
Tile, , Misc. Finishes, etc.		10	Service Truck				Generator																3	1
			1	300	5%	4	1	10	20%	16														
Furnishings, Fixtures & Equipment		2	Service Truck																				3	1
			1	300	5%	1																		
Site walkways, hardscape, trail connections etc.		15	Skid Steer Loader				Service Truck				Landscape Tractor/Loader				24"-36" Walk Behind Compactor				Vibrating Plate Compactor or Tamper				5	3
			1	60	80%	96	1	300	20%	24	1	90	50%	60	1	10	50%	60	1	5	20%	24		

Operation	Area	Duration	Equipment 1				Equipment 2				Equipment 3				Equipment 4				Equipment 5				Crew Size	Material Delivery
	(Acres)	(Days)	Amount (EA)	Power (hp)	Use (%)	Total Hrs	Number (EA)	Power (hp)	Use (%)	Total Hrs	Number (EA)	Power (hp)	Use (%)	Total Hrs	Number (EA)	Power (hp)	Use (%)	Total Hrs	Number (EA)	Power (hp)	Use (%)	Total Hrs	(EA)	(Loads)
Landscaping		10	Skid Steer Loader				Landscape Tractor/Loader				Service Truck				Water Truck				Trencher				5	4
			1	60	20%	16	1	90	50%	40	1	300	20%	16	1	300	10%	8	1	30	20%	16		
Yosemite Lodge Shuttle Stop, and Pathways (Phase 2 Construction)																								
Foundation Excavation/Backfill		4	Backhoe Loader				Skid Steer Loader				Wheel Loader				Water Truck				Bob Tail Dump Truck 25,000 GVW				5	3
			1	75	50%	16	1	60	80%	26	1	150	20%	6	1	300	10%	3	1	200	20%	6		
Foundation Construction		5	Concrete Pump				Generator				Wheel Loader				Service Truck								5	2
			1	70	25%	10	1	10	50%	20	1	150	10%	4	1	300	5%	2						
Exterior Closure/Carpentry		3	Generator				Service Truck				Forklift/Skytrack												3	1
			1	10	50%	12	1	300	5%	1	1	100	10%	2										
Field Roof Installation		2	Generator				Service Truck				Conveyor/Hoist												5	1
			1	10	75%	12	1	300	5%	1	1	100	5%	1										
Site walkways, hardscape etc.		20	Skid Steer Loader				Service Truck				Landscape Tractor/Loader				24"-36" Walk Behind Compactor				Vibrating Plate Compactor or Tamper				12	20
			1	60	80%	128	1	300	20%	32	1	90	50%	80	1	10	50%	80	1	5	20%	32		
Landscaping		20	Skid Steer Loader				Landscape Tractor/Loader				Service Truck				Water Truck				Trencher				10	10
			1	60	20%	32	1	90	50%	80	1	300	20%	32	1	300	10%	16	1	30	20%	32		
Yosemite Lodge Parking Lot (Phase 1)																								
Building Demolition		20	Track Excavator				Crawler Loader				Skid Steer Loader				10 Wheel Dump Truck 50,000 GVW				Water Truck				6	5
			1	90	50%	80	1	130	100%	160	1	60	50%	80	3	350	100%	480	1	300	30%	48		
Misc. Site Demolition		5	Crawler Loader				Skid Steer Loader				10 Wheel Dump Truck 50,000 GVW				Water Truck				36"-48" Ride on Compactor				6	2
			1	130	100%	40	1	60	50%	20	2	350	100%	80	1	300	100%	40	1	10	25%	10		
Clearing, Site Grading		5	Elevating Scraper				Motor Grader 12'				Water Truck				Crawler Tractor D6 Class Bulldozer				Self Propelled Compactor				10	10
			2	200	100%	80	1	190	100%	40	2	300	100%	80	1	150	60%	24	1	240	100%	40		
Utility Relocations and Drainage Improvements		15	Track Excavator				Backhoe Loader				Wheel Loader				Water Truck				Vibrating Plate Compactor or Tamper				8	60
			1	90	50%	60	1	75	50%	60	1	150	30%	36	1	300	10%	12	1	5	20%	24		
Parking Lot & Road Subrade Prep & Roadbase work		15	Elevating Scraper				Motor Grader 12'				Water Truck				66" Smooth Drum Vibratory Compactor				36"-48" Ride on Compactor				10	30
			1	200	25%	30	1	190	100%	120	2	300	100%	240	1	80	100%	120	1	10	25%	30		
Asphalt Paving & Roadwork		5	Motor Grader 12'				Asphalt Spreader				Dual Drum Breakdown Roller				Finish Roller				36"-48" Ride on Roller				12	20
			1	190	20%	8	1	150	80%	32	1	140	80%	32	1	90	80%	32	1	15	50%	20		
Site walkways, Curb & Gutter, Hardscape etc.		22	Skid Steer Loader				Service Truck				Landscape Tractor/Loader				24"-36" Walk Behind Compactor				Vibrating Plate Compactor or Tamper				8	10
			1	60	50%	88	1	300	20%	35	1	90	30%	53	1	10	25%	44	1	5	20%	35		
Landscaping		22	Skid Steer Loader				Landscape Tractor/Loader				Service Truck				Water Truck				Trencher				10	10
			1	60	20%	35	1	90	50%	88	1	300	20%	35	1	300	10%	18	1	30	20%	35		

EQUIPMENT EMISSION FACTORS AND ANNUAL EMISSIONS

Equipment Type	HP	Total Annual Hours			Cumulative Hours Prior to Project	Load Factor	Zero Hour (zh) Emissions and Deterioration Rate (dr) (grams/horsepower-hour)										Emission Factors (g/hp-hr)								Annual Emissions (tons/year)						
		FY2017	FY2018	Sum			THCzh	THCdr	COzh	COdr	NOXzh	NOXdr	PMzh	PMdr	CO2zh	CO2dr	THC	ROG	CO	NOx	PM10	PM2.5	CO2	SO2	ROG	CO	NOx	PM10	PM2.5	CO2	SO2
Track Excavator	90	216	396	612	4267.90	0.3819	9.0E-02	2.3E-05	3.1E+00	8.1E-05	2.5E+00	3.4E-05	7.0E-02	4.3E-06	5.7E+02	0.0E+00	0.1886	0.1581	3.3957	2.6743	0.0884	0.0815	568.3000	0.0054	0.00	0.08	0.06	0.00	0.00	11.95	0.00
Backhoe Loader	75	271	408	679	4564.49	0.3685	9.0E-02	2.3E-05	3.1E+00	8.1E-05	2.5E+00	3.4E-05	7.0E-02	4.3E-06	5.7E+02	0.0E+00	0.1954	0.1638	3.4197	2.6843	0.0896	0.0827	568.3000	0.0054	0.00	0.07	0.06	0.00	0.00	10.67	0.00
Crawler Loader	130	0	256	256	4564.49	0.3685	1.0E-01	2.5E-05	2.7E+00	7.1E-05	2.5E+00	3.2E-05	1.4E-01	1.0E-05	5.7E+02	0.0E+00	0.2141	0.1795	3.0259	2.5961	0.1856	0.1713	568.3000	0.0054	0.00	0.04	0.04	0.00	0.00	6.97	0.00
Wheel Loader	150	294	298	592	4564.49	0.3685	1.0E-01	2.5E-05	2.7E+00	7.1E-05	2.5E+00	3.2E-05	1.4E-01	1.0E-05	5.7E+02	0.0E+00	0.2141	0.1795	3.0259	2.5961	0.1856	0.1713	568.3000	0.0054	0.01	0.11	0.09	0.01	0.01	18.60	0.00
Water Truck	300	1475	1285	2760	9724.36	0.3819	1.0E-01	2.5E-05	9.2E-01	1.8E-05	2.5E+00	3.2E-05	1.1E-01	5.6E-06	5.7E+02	0.0E+00	0.3431	0.2876	1.0970	2.7592	0.1640	0.1513	568.3000	0.0054	0.10	0.38	0.96	0.06	0.05	179.70	0.00
Vibratory or Plate Compactor	5	242	253	494	2841.22	0.3551	4.9E-01	0.0E+00	3.5E+00	0.0E+00	4.4E+00	0.0E+00	3.8E-01	0.0E+00	5.7E+02	0.0E+00	0.4900	0.4107	3.4700	4.3700	0.3800	0.3507	568.3000	0.0054	0.00	0.00	0.00	0.00	0.00	0.50	0.00
Walk Behind/Ride On Compactor	10	178	582	760	2841.22	0.3551	4.9E-01	0.0E+00	3.5E+00	0.0E+00	4.4E+00	0.0E+00	3.8E-01	0.0E+00	5.7E+02	0.0E+00	0.4900	0.4107	3.4700	4.3700	0.3800	0.3507	568.3000	0.0054	0.00	0.01	0.01	0.00	0.00	1.53	0.00
Self Propelled Compactor	240	440	240	680	2841.22	0.3551	1.0E-01	2.5E-05	9.2E-01	2.4E-05	2.5E+00	3.2E-05	1.1E-01	5.6E-06	5.7E+02	0.0E+00	0.1710	0.1434	0.9890	2.5404	0.1259	0.1162	568.3000	0.0054	0.01	0.06	0.16	0.01	0.01	32.93	0.00
Smooth Drum Compactor	80	232	320	552	2841.22	0.3551	9.0E-02	2.3E-05	3.1E+00	8.1E-05	2.5E+00	3.4E-05	7.0E-02	4.3E-06	5.7E+02	0.0E+00	0.1556	0.1305	3.2801	2.6260	0.0822	0.0759	568.3000	0.0054	0.00	0.06	0.05	0.00	0.00	8.91	0.00
Concrete Pump	70	146	140	286	3312.29	0.4154	9.0E-02	2.3E-05	3.1E+00	8.1E-05	2.5E+00	3.4E-05	7.0E-02	4.3E-06	5.7E+02	0.0E+00	0.1665	0.1396	3.3183	2.6420	0.0842	0.0777	568.3000	0.0054	0.00	0.03	0.02	0.00	0.00	4.73	0.00
Generator	10	1500	1696	3196	3312.29	0.4154	4.9E-01	0.0E+00	3.5E+00	0.0E+00	4.4E+00	0.0E+00	3.8E-01	0.0E+00	5.7E+02	0.0E+00	0.4900	0.4107	3.4700	4.3700	0.3800	0.3507	568.3000	0.0054	0.01	0.05	0.06	0.01	0.01	7.55	0.00
Service Truck	300	594	714	1308	9724.36	0.3819	1.0E-01	2.5E-05	9.2E-01	1.8E-05	2.5E+00	3.2E-05	1.1E-01	5.6E-06	5.7E+02	0.0E+00	0.3431	0.2876	1.0970	2.7592	0.1640	0.1513	568.3000	1.0054	0.05	0.18	0.46	0.03	0.02	85.16	0.17
Hydraulic Crane	300	120	180	300	2983.13	0.2881	1.0E-01	2.5E-05	9.2E-01	1.8E-05	2.5E+00	3.2E-05	1.1E-01	5.6E-06	5.7E+02	0.0E+00	0.1746	0.1463	0.9743	2.5449	0.1266	0.1168	568.3000	0.0054	0.00	0.03	0.07	0.00	0.00	14.74	0.00
Forklift/Skytrack	100	93	41	134	1620.62	0.4020	9.0E-02	2.3E-05	3.1E+00	8.1E-05	2.5E+00	3.4E-05	7.0E-02	4.3E-06	5.7E+02	0.0E+00	0.1274	0.1068	3.1813	2.5848	0.0770	0.0710	568.3000	0.0054	0.00	0.02	0.02	0.00	0.00	3.05	0.00
Conveyor/Hoist	100	26	76	102	3312.29	0.4154	9.0E-02	2.3E-05	3.1E+00	8.1E-05	2.5E+00	3.4E-05	7.0E-02	4.3E-06	5.7E+02	0.0E+00	0.1665	0.1396	3.3183	2.6420	0.0842	0.0777	568.3000	0.0054	0.00	0.02	0.01	0.00	0.00	2.40	0.00
Skidsteer Loader	60	491	1148	1639	2246.18	0.3685	9.0E-02	2.3E-05	3.1E+00	8.1E-05	2.5E+00	3.4E-05	7.0E-02	4.3E-06	5.7E+02	0.0E+00	0.1419	0.1189	3.2319	2.6059	0.0797	0.0735	568.3000	0.0054	0.00	0.13	0.10	0.00	0.00	20.60	0.00
Tractor/Loader	90	459	1002	1461	4564.49	0.3685	9.0E-02	2.3E-05	3.1E+00	8.1E-05	2.5E+00	3.4E-05	7.0E-02	4.3E-06	5.7E+02	0.0E+00	0.1954	0.1638	3.4197	2.6843	0.0896	0.0827	568.3000	0.0054	0.01	0.18	0.14	0.00	0.00	27.53	0.00
Trencher	30	120	198	318	2441.52	0.5025	1.0E-01	4.0E-05	2.7E+00	2.8E-04	4.8E+00	1.0E-04	1.6E-01	1.2E-05	5.7E+02	0.0E+00	0.1977	0.1657	3.3939	5.0442	0.1893	0.1747	568.3000	0.0054	0.00	0.02	0.03	0.00	0.00	2.73	0.00
Scraper	200	938	560	1498	3689.23	0.4824	1.0E-01	2.5E-05	9.2E-01	2.4E-05	2.5E+00	3.2E-05	1.1E-01	5.6E-06	5.7E+02	0.0E+00	0.1922	0.1611	1.0096	2.5673	0.1306	0.1206	568.3000	0.0054	0.03	0.16	0.41	0.02	0.02	82.13	0.00
Grader	190	662	582	1245	5363.98	0.4087	1.0E-01	2.5E-05	9.2E-01	2.4E-05	2.5E+00	3.2E-05	1.1E-01	5.6E-06	5.7E+02	0.0E+00	0.2341	0.1962	1.0503	2.6206	0.1400	0.1292	568.3000	0.0054	0.02	0.11	0.28	0.01	0.01	54.93	0.00
Crawler Tractor/D6 Dozer	150	264	144	408	3726.32	0.4288	1.0E-01	2.5E-05	2.7E+00	7.1E-05	2.5E+00	3.2E-05	1.4E-01	1.0E-05	5.7E+02	0.0E+00	0.1932	0.1619	2.9661	2.5692	0.1773	0.1636	568.3000	0.0054	0.00	0.09	0.07	0.01	0.00	14.91	0.00
Reclaiming Stabilizer	360	64	0	64	1710.18	0.3015	1.0E-01	2.5E-05	9.2E-01	1.8E-05	2.5E+00	3.2E-05	1.1E-01	5.6E-06	5.7E+02	0.0E+00	0.1428	0.1197	0.9511	2.5044	0.1195	0.1103	568.3000	0.0054	0.00	0.01	0.02	0.00	0.00	3.95	0.00
10 Wheel Dump Truck 50,000 GVW	350	256	632	888	9724.36	0.3819	1.0E-01	2.5E-05	9.2E-01	1.8E-05	2.5E+00	3.2E-05	1.1E-01	5.6E-06	5.7E+02	0.0E+00	0.3431	0.2876	1.0970	2.7592	0.1640	0.1513	568.3000	1.0054	0.04	0.14	0.36	0.02	0.02	67.45	0.13
Asphalt Spreader	150	90	90	179	2513.33	0.4154	1.0E-01	2.5E-05	2.7E+00	7.1E-05	2.5E+00	3.2E-05	1.4E-01	1.0E-05	5.7E+02	0.0E+00	0.1628	0.1365	2.8795	2.5304	0.1651	0.1524	568.3000	2.0054	0.00	0.04	0.03	0.00	0.00	6.35	0.02
Dual Drum Roller	140	90	90	179	2139.42	0.3752	1.0E-01	2.5E-05	2.7E+00	7.1E-05	2.5E+00	3.2E-05	1.4E-01	1.0E-05	5.7E+02	0.0E+00	0.1535	0.1287	2.8528	2.5185	0.1614	0.1490	568.3000	3.0054	0.00	0.03	0.03	0.00	0.00	5.35	0.03
Finish Roller	90	90	90	179	2139.42	0.3752	9.0E-02	2.3E-05	3.1E+00	8.1E-05	2.5E+00	3.4E-05	7.0E-02	4.3E-06	5.7E+02	0.0E+00	0.1394	0.1169	3.2233	2.6023	0.0792	0.0731	568.3000	4.0054	0.00	0.02	0.02	0.00	0.00	3.44	0.03
Ride On Roller	15	56	56	112	2139.42	0.3752	4.9E-01	0.0E+00	3.5E+00	0.0E+00	4.4E+00	0.0E+00	3.8E-01	0.0E+00	5.7E+02	0.0E+00	0.4900	0.4107	3.4700	4.3700	0.3800	0.3507	568.3000	5.0054	0.00	0.00	0.00	0.00	0.00	0.36	0.00
Bob Tail Dump Truck 25,000 GVW	200	16	13	29	9724.36	0.3819	1.0E-01	2.5E-05	9.2E-01	1.8E-05	2.5E+00	3.2E-05	1.1E-01	5.6E-06	5.7E+02	0.0E+00	0.3431	0.2876	1.0970	2.7592	0.1640	0.1513	568.3000	6.0054	0.00	0.00	0.01	0.00	0.00	1.25	0.01
																								total	0.30	2.07	3.58	0.20	0.18	680.37	0.40

values in short tons, except for CO2, which is in metric tons

Notes:

1. Per the document, *Overview: OFFROAD Model* , California Air Resources Board, November 2006 (available at www.arb.ca.gov/msei/offroad/offroad.htm), emission factors are determined by the following equation:

   EF = ZH + dr * CHrs, where

   EF = emission factor, in grams per hoursepower-hour (g/bhp-hr)

   ZH = zero-hour emission rate or when the equipment is new (g/bhp-hr)

   dr = deterioration rate or the increase in ZH emissions as the equipment is used (g/bhp-hr ^{2})

   CHrs = cumulative hours or total number of hours accumulated on the equipment

2. Cumulative hours are based on the DOORS adjusted hours and the assumption that the equipment mix would be an average of five years old. *Per the document, Staff Report: Initial Statement of Reasonsfor Proposed Rulemaking – Proposed Amendments to the Regulation for In-use Off-road Diesel-fueled Fleets and the Off-road Large Spark-ignition Fleet Requirements* , California Air Resources Board, October 2010, Appendix D (OSM and Summary of Off-road Emissions Inventory Update), pages D-27 to D-28, CARB staff now assumes emission factors deteriorate only up to a maximum of 12,000 hours.

3. ROG = 83.82% THC, PM10 = 100% PM, and PM2.5 = 92.29% PM. Source: *2008 Estimated Annual Average Emissions – Statewide* , California Air Resources Board, data for Off-Road Equipment, sorted for diesel-fueled vehicles, available at http://www.arb.ca.gov/ei/emissiondata.htm (accessed February 25, 2011).

4. Per the document, *Overview: OFFROAD Model* (op cit.) and the OFFROAD2007 emfac.csv file, the SO_2 emission factor is based on fuel sulfur content and brake-specific fuel consumption. Per *Title 13 California Code of Regulations* sec. 2281 (Sulfur Content of Fuel), as of June 2006 diesel sulfur content in diesel fuel is limited to 15 parts per million. Per the October 2010 CARB Staff Report (op cit.), CARB staff used BSFC values from EPA's NONROAD emissions model, as documented in the report, *Exhaust and Crankcase Emission Factors for Nonroad Engine Modeling – Compression-Ignition* (EPA Report No. EPA420-P-04-009/NR-009C), U.S. Environmental Protection Agency, April 2004. Table A2 of the EPA report (pages A5-A8) documents that for diesel engines up to 100 hp, a brake specific fuel consumption (BSFC) value of 0.408 lb/hp-hr is used. For diesel engines larger than 100 hp, a BSFC value of 0.367 lb/hp-hr is used. The above factors assume a BSFC value of 0.4 lb/hp-hr. The SO_2 emission factor is calculated as follows:

   EF_{SO2} = (Parts S in fuel/million) * (MW_{SO2}/MW_S) * BSFC (lb/hp-hr) * 453.6 g/lb

   = (15 parts S/million) * (64 g/g-mole SO_2/32 g/g-mole S) * 0.4 lb/hp-hr * 453.6 g/lb

   = 0.0054 g SO_2/hp-hr

ON-ROAD CREW AND MATERIAL DELIVERY TRUCK ANNUAL EMISSIONS

Trip Type	Annual Roundtrips	Annual VMT	Annual Emissions (tons/year) ROG	CO	NOx	PM10	PM2.5	CO2	SO2
Crew	6,853	467,375	0.071	0.668	0.168	0.031	0.016	145.840	0.002
Material Delivery	1,411	412,818	0.068	0.327	3.494	0.074	0.043	681.890	0.008
Entrained Road Dust	8,264	880,193	--	--	--	0.471	0.116	--	--
Total On-Road Annual Emissions			0.14	1.00	3.66	0.58	0.18	827.73	0.01

metric tons/yr

EMFAC2011 Data Summary - Statewide Annual Average for Year 2017

Vehicle Type	Fuel	ROG Run (g/mi)	ROG Other (g/veh/day)	CO Run (g/mi)	CO Other (g/veh/day)	NOx Run (g/mi)	NOx Other (g/veh/day)	PM10 Run (g/mi)	PM10 Other (g/veh/day)	PM2.5 Run (g/mi)	PM2.5 Other (g/veh/day)	CO2 Run Pav (g/mi)	CO2 Other Pav (g/veh/day)	SOx Run (g/mi)	SOx Other
LDA	GAS	0.075524092	2.399111425	1.036836421	13.71294984	0.100691515	0.865213469	0.046519728	0.019042086	0.019379648	0.017550844	273.4671557	377.2889907	0.003507196	0.004895046
LDT1	GAS	0.245848217	5.855366594	2.591951334	32.53258	0.274577956	1.788252851	0.048544976	0.030702736	0.021246462	0.028300131	327.1534055	430.1539422	0.004064733	0.005716524
LDT2	GAS	0.117163109	3.237519502	1.44815995	20.11712202	0.179332615	1.794076903	0.046630611	0.019262295	0.019483759	0.017784322	397.3937798	538.5210021	0.004770166	0.006658885
T7 single construction	DSL	0.139399142	2.889843362	0.663457286	15.99540425	7.57557461	30.08622963	0.161360565	0.073390737	0.093991205	0.067519478	1640.095611	3425.480141	0.01647082	0.034400718

Activity Duration (days)	Crew Size	Crew Roundtrips	Material Loads	Material Truck VMT
45	8	180	45	7848
45	8	180	45	7848
30	10	150	60	77160
22	3	33	10	1744
60	5	150	20	3488
60	3	90	5	872
44	3	66	10	1744
60	8	240	3	523.2
60	3	90	30	5232
20	3	30	30	5232
45	8	180	10	1744
45	10	225	10	1744
45	7	158	5	872
30	3	45	5	872
20	4	40	2	348.8
20	3	30	5	872
7	3	11	10	1744
15	10	75	10	1744
5	10	25	5	872
15	10	75	30	5232
8	12	48	20	3488
15	10	75	5	872
30	10	150	10	1744
5	10	25	30	5232
2	12	12	20	3488
5	8	20	10	1744
5	10	25	10	1744
10	6	30	2	348.8
10	7	35	2	348.8
5	3	8	2	348.8
5	4	10	1	174.4
5	3	8	1	174.4
3	3	5	3	523.2
5	10	25	7	1220.8
5	8	20	5	872
45	8	180	20	3488
3	10	15	5	872
4	10	20	20	3488
4	12	24	10	1744
5	8	20	10	1744
5	10	25	10	1744
5	10	25	5	872
4	8	16	3	523.2
5	8	20	5	872
15	3	23	3	523.2
5	5	13	2	348.8
15	3	23	2	348.8
15	3	23	4	697.6
10	3	15	1	174.4
10	3	15	1	174.4
2	3	3	1	174.4
5	10	25	10	1744
5	8	20	10	1744
5	10	25	10	1744
4	5	10	3	523.2
5	5	13	3	523.2
15	3	23	3	523.2

Summary

6853	Total Annual Crew Roundtrips
467375	Total Annual Crew Roundtrip VMT
1411	Total Annual Material Delivery Roundtrips
412818	Total Annual Material Delivery Roundtrip VMT

Contractor Lodging One-Way Distances

Location	Miles	% of Trips
El Portal	15	40.00%
Mariposa	44	30.00%
Groveland	51	20.00%
Oakhurst	47	10.00%
Weighted Ave	34.1	miles

Materal Delivery One-Way Distances

Location	Miles	% of Trips
Modesto	119	10.00%
Merced	81	70.00%
Fresno	93	20.00%
Weighted Ave	87.2	miles

3	8	12	2	348.8
2	10	10	5	872
15	10	75	10	1744
10	10	50	30	5232
4	12	24	20	3488
60	8	240	60	10464
60	8	240	90	15696
45	10	225	90	115740
30	3	45	10	1744
90	5	225	20	3488
60	3	90	5	872
60	3	90	20	3488
120	3	180	3	523.2
120	3	180	30	5232
30	3	45	30	5232
45	12	270	20	3488
30	10	150	10	1744
4	5	10	3	523.2
5	5	13	2	348.8
3	3	5	1	174.4
2	5	5	1	174.4
20	12	120	20	3488
20	10	100	10	1744
5	6	15	5	872
2	6	6	2	348.8
10	10	50	10	1744
15	10	75	30	5232
5	12	30	20	3488
22	8	88	10	1744
22	10	110	10	1744
4	8	16	3	523.2
5	8	20	5	872
15	3	23	3	523.2
5	5	13	2	348.8
15	3	23	2	348.8
15	3	23	4	697.6
10	3	15	1	174.4
10	3	15	1	174.4
2	3	3	1	174.4
15	5	38	3	523.2
10	5	25	4	697.6
4	5	10	3	523.2
5	5	13	2	348.8
3	3	5	1	174.4
2	5	5	1	174.4
20	12	120	20	3488
20	10	100	10	1744
20	6	60	5	872
5	6	15	2	348.8
5	10	25	10	1744
15	8	60	60	10464
15	10	75	30	5232
5	12	30	20	3488
22	8	88	10	1744
22	10	110	10	1744

NOTES:

1. From FY2017 and FY2018 spreadsheets
2. Crew Roundtrips are based on the activity duration * crew size, and assumes two crew would travel to the site in each vehicle
3. The two material handling activities with the greatest VMT are based on an assumed one-way trip length of 643 miles, which is the average distance to the nearest factories for Pre-fabricated modules

ASPHALT OFF-GAS ANNUAL EMISSIONS

E (lb) = 2.62 lb/acres * A (acres)

Construction Activity		Square Feet	Acres to be Paved	Annual ROG Emissions (TPY)
Yosemite Lodge Day-Use Parking Area & Employee Housing/Parking	Parking	90000	2.066	0.003
	Bus Parking	69600	1.598	0.002
	Ped. Pathways	5000	0.115	0
	Employee Parking	79100	1.816	0.002
	Misc. Paving	14000	0.321	0
Camp 6	Roadway	100066	2.297	0.003
	Parking	363250	8.339	0.011
	Ped. Pathways	50070	1.149	0.002
Curry Village Guest Lodging at Boystown	Ped. Pathways	14200	0.326	0
	Parking	29400	0.675	0.001
	TOTAL	814686	18.703	0.025

Fuel	Min HP	Max HP	Year	THCzh	THCdr	COzh	COdr	NOXzh	NOXdr	PMzh	PMdr	CO2zh	CO2dr
D	1	15	1994	1.5	0.00E+00	5	0.00E+00	10	0.00E+00	1	0.00E+00	568.3	0.00E+00
D	1	15	1999	1.05	0.00E+00	5	0.00E+00	9.35	0.00E+00	0.57	0.00E+00	568.3	0.00E+00
D	1	15	2004	0.68	0.00E+00	3.47	0.00E+00	6.08	0.00E+00	0.47	0.00E+00	568.3	0.00E+00
D	1	15	2007	0.49	0.00E+00	3.47	0.00E+00	4.37	0.00E+00	0.38	0.00E+00	568.3	0.00E+00
D	1	15	2040	0.49	0.00E+00	3.47	0.00E+00	4.37	0.00E+00	0.19	0.00E+00	568.3	0.00E+00
D	16	25	1994	1.84	0.00E+00	5	0.00E+00	6.92	0.00E+00	0.76	0.00E+00	568.3	0.00E+00
D	16	25	1999	0.9	0.00E+00	5	0.00E+00	6.92	0.00E+00	0.57	0.00E+00	568.3	0.00E+00
D	16	25	2004	0.64	0.00E+00	2.34	0.00E+00	5.79	0.00E+00	0.38	0.00E+00	568.3	0.00E+00
D	16	25	2007	0.57	0.00E+00	2.34	0.00E+00	4.57	0.00E+00	0.38	0.00E+00	568.3	0.00E+00
D	16	25	2040	0.57	0.00E+00	2.34	0.00E+00	4.57	0.00E+00	0.19	0.00E+00	568.3	0.00E+00
D	26	50	1987	1.84	2.35E-04	5	5.13E-04	7	1.05E-04	0.76	5.89E-05	568.3	0.00E+00
D	26	50	1998	1.8	2.30E-04	5	5.13E-04	6.9	1.04E-04	0.76	5.89E-05	568.3	0.00E+00
D	26	50	2003	1.45	1.85E-04	4.1	4.20E-04	5.55	1.03E-04	0.6	4.65E-05	568.3	0.00E+00
D	26	50	2004	0.64	9.80E-05	3.27	3.34E-04	5.1	9.33E-05	0.43	3.36E-05	568.3	0.00E+00
D	26	50	2005	0.37	6.90E-05	3	3.05E-04	4.95	9.67E-05	0.38	2.93E-05	568.3	0.00E+00
D	26	50	2007	0.24	5.45E-05	2.86	2.90E-04	4.88	9.83E-05	0.35	2.72E-05	568.3	0.00E+00
D	26	50	2012	0.1	4.00E-05	2.72	2.76E-04	4.8	1.00E-04	0.16	1.20E-05	568.3	0.00E+00
D	26	50	2040	0.1	4.00E-05	2.72	2.76E-04	2.9	6.00E-05	0.01	1.20E-06	568.3	0.00E+00
D	51	120	1987	1.44	6.66E-05	4.8	1.27E-04	13	3.01E-04	0.84	6.11E-05	568.3	0.00E+00
D	51	120	1997	0.99	4.58E-05	3.49	9.23E-05	8.75	2.02E-04	0.69	5.02E-05	568.3	0.00E+00
D	51	120	2003	0.99	4.58E-05	3.49	9.23E-05	6.9	1.60E-04	0.69	5.02E-05	568.3	0.00E+00
D	51	120	2004	0.46	3.33E-05	3.23	8.55E-05	5.64	1.03E-04	0.39	2.85E-05	568.3	0.00E+00
D	51	120	2005	0.28	2.92E-05	3.14	8.33E-05	5.22	8.40E-05	0.29	2.12E-05	568.3	0.00E+00
D	51	120	2007	0.19	2.71E-05	3.09	8.21E-05	5.01	7.45E-05	0.24	1.76E-05	568.3	0.00E+00
D	51	120	2011	0.1	2.50E-05	3.05	8.10E-05	2.89	3.80E-05	0.2	8.58E-06	568.3	0.00E+00
D	51	120	2012	0.09	2.31E-05	3.05	8.10E-05	2.53	3.38E-05	0.07	4.30E-06	568.3	0.00E+00
D	51	120	2014	0.09	2.31E-05	3.05	8.10E-05	2.53	3.38E-05	0.01	1.04E-06	568.3	0.00E+00
D	51	120	2040	0.07	1.74E-05	3.05	8.10E-05	1.4	1.88E-05	0.01	1.04E-06	568.3	0.00E+00
D	121	175	1969	1.32	6.11E-05	4.4	1.16E-04	14	3.24E-04	0.77	5.60E-05	568.3	0.00E+00
D	121	175	1971	1.1	5.09E-05	4.4	1.16E-04	13	3.01E-04	0.66	4.80E-05	568.3	0.00E+00
D	121	175	1979	1	4.63E-05	4.4	1.16E-04	12	2.78E-04	0.55	4.00E-05	568.3	0.00E+00
D	121	175	1984	0.94	4.35E-05	4.3	1.14E-04	11	2.54E-04	0.55	4.00E-05	568.3	0.00E+00
D	121	175	1987	0.88	4.07E-05	4.2	1.11E-04	11	2.54E-04	0.55	4.00E-05	568.3	0.00E+00
D	121	175	1996	0.68	3.15E-05	2.7	7.14E-05	8.17	1.89E-04	0.38	2.76E-05	568.3	0.00E+00
D	121	175	2002	0.68	3.15E-05	2.7	7.14E-05	6.9	1.60E-04	0.38	2.76E-05	568.3	0.00E+00
D	121	175	2003	0.33	2.79E-05	2.7	7.14E-05	5.26	9.64E-05	0.24	1.70E-05	568.3	0.00E+00
D	121	175	2004	0.22	2.63E-05	2.7	7.14E-05	4.72	7.52E-05	0.19	1.35E-05	568.3	0.00E+00
D	121	175	2006	0.16	2.57E-05	2.7	7.14E-05	4.44	6.46E-05	0.16	1.18E-05	568.3	0.00E+00
D	121	175	2011	0.1	2.50E-05	2.7	7.14E-05	2.45	3.20E-05	0.14	1.00E-05	568.3	0.00E+00
D	121	175	2014	0.09	2.17E-05	2.7	7.14E-05	2.27	2.88E-05	0.01	5.00E-07	568.3	0.00E+00
D	121	175	2040	0.05	1.17E-05	2.7	7.14E-05	0.27	3.75E-06	0.01	5.00E-07	568.3	0.00E+00
D	176	250	1969	1.32	6.11E-05	4.4	1.16E-04	14	3.24E-04	0.77	5.60E-05	568.3	0.00E+00
D	176	250	1971	1.1	5.09E-05	4.4	1.16E-04	13	3.01E-04	0.66	4.80E-05	568.3	0.00E+00
D	176	250	1979	1	4.63E-05	4.4	1.16E-04	12	2.78E-04	0.55	4.00E-05	568.3	0.00E+00
D	176	250	1984	0.94	4.35E-05	4.3	1.14E-04	11	2.54E-04	0.55	4.00E-05	568.3	0.00E+00
D	176	250	1987	0.88	4.07E-05	4.2	1.11E-04	11	2.54E-04	0.55	4.00E-05	568.3	0.00E+00
D	176	250	1995	0.68	3.15E-05	2.7	7.14E-05	8.17	1.89E-04	0.38	2.76E-05	568.3	0.00E+00
D	176	250	2002	0.32	1.48E-05	0.92	2.43E-05	6.25	1.45E-04	0.15	7.96E-06	568.3	0.00E+00
D	176	250	2003	0.19	2.09E-05	0.92	2.43E-05	5	9.05E-05	0.12	6.51E-06	568.3	0.00E+00
D	176	250	2004	0.14	2.30E-05	0.92	2.43E-05	4.58	7.23E-05	0.11	6.03E-06	568.3	0.00E+00
D	176	250	2006	0.12	2.40E-05	0.92	2.43E-05	4.38	6.33E-05	0.11	5.79E-06	568.3	0.00E+00
D	176	250	2010	0.1	2.50E-05	0.92	2.43E-05	2.45	3.18E-05	0.11	5.59E-06	568.3	0.00E+00
D	176	250	2013	0.07	1.83E-05	0.92	2.43E-05	1.36	1.75E-05	0.01	3.75E-07	568.3	0.00E+00
D	176	250	2040	0.05	1.17E-05	0.92	2.43E-05	0.27	3.75E-06	0.01	3.75E-07	568.3	0.00E+00
D	251	500	1969	1.26	4.39E-05	4.2	8.32E-04	14	2.33E-04	0.74	3.93E-05	568.3	0.00E+00
D	251	500	1971	1.05	3.66E-05	4.2	8.32E-04	13	2.16E-04	0.63	3.34E-05	568.3	0.00E+00
D	251	500	1979	0.95	3.31E-05	4.2	8.32E-04	12	2.00E-04	0.53	2.81E-05	568.3	0.00E+00
D	251	500	1984	0.9	3.14E-05	4.2	8.32E-04	11	1.83E-04	0.53	2.81E-05	568.3	0.00E+00
D	251	500	1987	0.84	2.93E-05	4.1	8.12E-04	11	1.83E-04	0.53	2.81E-05	568.3	0.00E+00
D	251	500	1995	0.68	2.37E-05	2.7	5.35E-05	8.17	1.36E-04	0.38	2.02E-05	568.3	0.00E+00
D	251	500	2000	0.32	1.12E-05	0.92	1.82E-05	6.25	1.04E-04	0.15	7.96E-06	568.3	0.00E+00
D	251	500	2001	0.19	1.95E-05	0.92	1.82E-05	4.95	7.34E-05	0.12	6.51E-06	568.3	0.00E+00
D	251	500	2002	0.14	2.22E-05	0.92	1.82E-05	4.51	6.32E-05	0.11	6.03E-06	568.3	0.00E+00
D	251	500	2004	0.12	2.36E-05	0.92	1.82E-05	4.29	5.81E-05	0.11	5.79E-06	568.3	0.00E+00
D	251	500	2005	0.1	2.50E-05	0.92	1.82E-05	4	5.30E-05	0.11	5.55E-06	568.3	0.00E+00
D	251	500	2010	0.1	2.50E-05	0.92	1.82E-05	2.45	3.18E-05	0.11	5.55E-06	568.3	0.00E+00
D	251	500	2013	0.07	1.83E-05	0.92	1.82E-05	1.36	1.75E-05	0.01	3.75E-07	568.3	0.00E+00
D	251	500	2040	0.05	1.17E-05	0.92	1.82E-05	0.27	3.75E-06	0.01	3.75E-07	568.3	0.00E+00
D	501	750	1969	1.26	4.39E-05	4.2	8.32E-04	14	2.33E-04	0.74	3.93E-05	568.3	0.00E+00
D	501	750	1971	1.05	3.66E-05	4.2	8.32E-04	13	2.16E-04	0.63	3.34E-05	568.3	0.00E+00
D	501	750	1979	0.95	3.31E-05	4.2	8.32E-04	12	2.00E-04	0.53	2.81E-05	568.3	0.00E+00
D	501	750	1984	0.9	3.14E-05	4.2	8.32E-04	11	1.83E-04	0.53	2.81E-05	568.3	0.00E+00
D	501	750	1987	0.84	2.93E-05	4.1	8.12E-04	11	1.83E-04	0.53	2.81E-05	568.3	0.00E+00
D	501	750	1995	0.68	2.37E-05	2.7	5.35E-05	8.17	1.36E-04	0.38	2.02E-05	568.3	0.00E+00
D	501	750	2001	0.32	1.12E-05	0.92	1.82E-05	6.25	1.04E-04	0.15	7.96E-06	568.3	0.00E+00
D	501	750	2002	0.19	1.95E-05	0.92	1.82E-05	4.95	7.34E-05	0.12	6.51E-06	568.3	0.00E+00
D	501	750	2003	0.14	2.22E-05	0.92	1.82E-05	4.51	6.32E-05	0.11	6.03E-06	568.3	0.00E+00
D	501	750	2005	0.12	2.36E-05	0.92	1.82E-05	4.29	5.81E-05	0.11	5.79E-06	568.3	0.00E+00
D	501	750	2010	0.1	2.50E-05	0.92	1.82E-05	2.45	3.18E-05	0.11	5.55E-06	568.3	0.00E+00
D	501	750	2013	0.07	1.83E-05	0.92	1.82E-05	1.36	1.75E-05	0.01	3.75E-07	568.3	0.00E+00
D	501	750	2040	0.05	1.17E-05	0.92	1.82E-05	0.27	3.75E-06	0.01	3.75E-07	568.3	0.00E+00
D	751	1000	1969	1.26	4.39E-05	4.2	8.32E-04	14	2.33E-04	0.74	3.93E-05	568.3	0.00E+00
D	751	1000	1971	1.05	3.66E-05	4.2	8.32E-04	13	2.16E-04	0.63	3.34E-05	568.3	0.00E+00
D	751	1000	1979	0.95	3.31E-05	4.2	8.32E-04	12	2.00E-04	0.53	2.81E-05	568.3	0.00E+00
D	751	1000	1984	0.9	3.14E-05	4.2	8.32E-04	11	1.83E-04	0.53	2.81E-05	568.3	0.00E+00
D	751	1000	1987	0.84	2.93E-05	4.1	8.12E-04	11	1.83E-04	0.53	2.81E-05	568.3	0.00E+00
D	751	1000	1999	0.68	1.12E-05	2.7	5.35E-05	8.17	1.36E-04	0.38	2.02E-06	568.3	0.00E+00
D	751	1000	2005	0.32	1.12E-05	0.92	1.82E-05	6.25	1.04E-04	0.15	7.96E-06	568.3	0.00E+00
D	751	1000	2006	0.19	1.95E-05	0.92	1.82E-05	4.95	7.34E-05	0.12	6.51E-06	568.3	0.00E+00
D	751	1000	2007	0.14	2.22E-05	0.92	1.82E-05	4.51	6.32E-05	0.11	6.03E-06	568.3	0.00E+00
D	751	1000	2009	0.12	2.36E-05	0.92	1.82E-05	4.29	5.81E-05	0.11	5.79E-06	568.3	0.00E+00
D	751	1000	2010	0.1	2.50E-05	0.92	1.82E-05	4.08	5.30E-05	0.11	5.55E-06	568.3	0.00E+00
D	751	1000	2014	0.07	1.83E-05	0.92	1.82E-05	2.36	3.00E-05	0.06	2.50E-06	568.3	0.00E+00

D	751	1000	2040	0.05	1.17E-05	0.92	1.82E-05	2.36	3.00E-05	0.02	1.00E-06	568.3	0.00E+00
D	1001	9999	1969	1.26	4.39E-05	4.2	8.32E-04	14	2.33E-04	0.74	3.93E-05	568.3	0.00E+00
D	1001	9999	1971	1.05	3.66E-05	4.2	8.32E-04	13	2.16E-04	0.63	3.34E-05	568.3	0.00E+00
D	1001	9999	1979	0.95	3.31E-05	4.2	8.32E-04	12	2.00E-04	0.53	2.81E-05	568.3	0.00E+00
D	1001	9999	1984	0.9	3.14E-05	4.2	8.32E-04	11	1.83E-04	0.53	2.81E-05	568.3	0.00E+00
D	1001	9999	1987	0.84	2.93E-05	4.1	8.12E-04	11	1.83E-04	0.53	2.81E-05	568.3	0.00E+00
D	1001	9999	1999	0.68	1.12E-05	2.7	5.35E-05	8.17	1.36E-04	0.38	2.02E-06	568.3	0.00E+00
D	1001	9999	2005	0.32	1.12E-05	0.92	1.82E-05	6.25	1.04E-04	0.15	7.96E-06	568.3	0.00E+00
D	1001	9999	2006	0.19	1.95E-05	0.92	1.82E-05	4.95	7.34E-05	0.12	6.51E-06	568.3	0.00E+00
D	1001	9999	2007	0.14	2.22E-05	0.92	1.82E-05	4.51	6.32E-05	0.11	6.03E-06	568.3	0.00E+00
D	1001	9999	2009	0.12	2.36E-05	0.92	1.82E-05	4.29	5.81E-05	0.11	5.79E-06	568.3	0.00E+00
D	1001	9999	2010	0.1	2.50E-05	0.92	1.82E-05	4.08	5.30E-05	0.11	5.55E-06	568.3	0.00E+00
D	1001	9999	2014	0.1	2.50E-05	0.92	1.82E-05	2.36	3.00E-05	0.06	2.50E-06	568.3	0.00E+00
D	1001	9999	2040	0.05	1.17E-05	0.92	1.82E-05	2.36	3.00E-05	0.02	1.00E-06	568.3	0.00E+00

Notes:

1. The above factors are in grams/hp-hr and were derived from the following table: Offroad2007 (Version 2.0.1.2), California Air Resources Board, December 15, 2006, data from emfac.csv file
2. The above factors are also consistent with the factors used by ARB staff to estimate off-road diesel equipment emissions, as documented in *Staff Report: Initial Statement of Reasons for Proposed Rulemaking – Proposed Amendments to the Regulation for In-use Off-road Diesel-fueled Fleets and the Off-road Large Spark-ignition Fleet Requirements*, California Air Resources Board, October 2010, Appendix D (OSM and Summary of Off-road Emissions Inventory Update), Attachment D (Diesel Emission Factors (g/bhp-hr)).

Equipment Class	Equipment	Age	DOORS Adjusted Final	Cumulative Hours Final
Construction and Mining	Bore/Drill Rigs	5	391.656	3238.32643
Construction and Mining	Cranes	5	476.7084	2983.12545
Construction and Mining	Crawler Tractors	5	575.04975	3726.32236
Construction and Mining	Excavators	5	636.35814	4267.89979
Construction and Mining	Graders	5	810.48908	5363.98302
Construction and Mining	Off-Highway Tractors	5	676.22424	4270.6996
Construction and Mining	Off-Highway Trucks	5	1471.5458	9724.36489
Construction and Mining	Other Construction Equipment	5	495.98904	3312.29462
Construction and Mining	Pavers	5	396.20785	2513.33307
Construction and Mining	Paving Equipment	5	454.27704	2841.22288
Construction and Mining	Rollers	5	337.22134	2139.42061
Construction and Mining	Rough Terrain Forklifts	5	255.0426	1620.61647
Construction and Mining	Rubber Tired Dozers	5	988.13178	6229.82221
Construction and Mining	Rubber Tired Loaders	5	1110.3051	7313.78885
Construction and Mining	Scrapers	5	576.27266	3689.23381
Construction and Mining	Skid Steer Loaders	5	319.31035	2246.18318
Construction and Mining	Surfacing Equipment	5	264.54647	1710.17835
Construction and Mining	Tractors/Loaders/Backhoes	5	664.90933	4564.49235
Construction and Mining	Trenchers	5	383.33991	2441.5217

EquipmentTypeID	Adj ARB LF
Bore/Drill Rigs	0.5025
Cranes	0.2881
Crawler Tractors	0.4288
Excavators	0.3819
Graders	0.4087
Off-Highway Tractors	0.4355
Off-Highway Trucks	0.3819
Other Construction Equipment	0.4154
Pavers	0.4154
Paving Equipment	0.3551
Rollers	0.3752
Rough Terrain Forklifts	0.402
Rubber Tired Dozers	0.3953
Rubber Tired Loaders	0.3618
Scrapers	0.4824
Skid Steer Loaders	0.3685
Surfacing Equipment	0.3015
Tractors/Loaders/Backhoes	0.3685
Trenchers	0.5025

Notes:

1. Equipment Prior Hours and Load Factors: Based on updated OFFROAD Equipment information in the *Emissions Inventory Model for Baseline and Final Proposal* access database (ARB, October 28, 2010)

EMFAC2011 Emission Rates
Region Type: Statewide
Region: California
Calendar Year: 2017
Season: Annual
Vehicle Classification: EMFAC2011 Categories

Region	CalYr	Season	Veh_Class	Fuel	MdlYr	Speed (miles/hr)	Population (vehicles)	VMT (miles/day	Trips (trips/day)	ROG_RUNEX (gms/mile)	ROG_IDLEX (gms/vehicle/day)	ROG_STREX (gms/vehicle/day)	ROG_DIURN (gms/vehicle/day)	ROG_HTSK (gms/vehicle/day)	ROG_RUNLS (gms/mile)	ROG_RESTL (gms/vehicle/day)	TOG_RUNEX (gms/mile)	TOG_IDLEX (gms/vehicle/day)	TOG_STREX (gms/vehicle/day)
Statewide	2017	Annual	LDA	GAS	Aggregate	Aggregate	13848337	5.09E+08	87400952	0.027100689	0	1.023015925	0.321370547	0.784104697	0.048423403	0.270620254	0.039514972	0	1.092973181
Statewide	2017	Annual	LDA	DSL	Aggregate	Aggregate	58039.71	2019413	350686.4	0.030425622	0	0	0	0	0	0	0.034637547	0	0
Statewide	2017	Annual	LDT1	GAS	Aggregate	Aggregate	1791711	65474600	10890166	0.073116952	0	2.445569464	0.942349936	1.776548502	0.172731265	0.690898693	0.098482892	0	2.612283315
Statewide	2017	Annual	LDT1	DSL	Aggregate	Aggregate	2469.855	88186.64	13699.04	0.055271671	0	0	0	0	0	0	0.062923121	0	0
Statewide	2017	Annual	LDT2	GAS	Aggregate	Aggregate	4776861	1.86E+08	30041958	0.035045608	0	1.452539964	0.427017432	0.987149965	0.0821175	0.370812142	0.052100148	0	1.551404622
Statewide	2017	Annual	LDT2	DSL	Aggregate	Aggregate	2213.206	88330.43	13459.93	0.031961868	0	0	0	0	0	0	0.03638646	0	0
Statewide	2017	Annual	LHD1	GAS	Aggregate	Aggregate	730330.6	31244324	10880836	0.143189043	0.538013916	9.02535867	0.05571208	1.571875117	0.235572034	0.029562144	0.168588952	0.569080538	9.638445378
Statewide	2017	Annual	LHD1	DSL	Aggregate	Aggregate	383059.3	16097252	4818404	0.185515245	0.109759105	0	0	0	0	0	0.211196766	0.124953444	0
Statewide	2017	Annual	LHD2	GAS	Aggregate	Aggregate	66337.85	2842795	988335.1	0.086653236	0.53808239	7.905331501	0.047320501	1.421270377	0.195785153	0.026226072	0.106223893	0.569152598	8.445952371
Statewide	2017	Annual	LHD2	DSL	Aggregate	Aggregate	99463.26	4155104	1251123	0.166427863	0.109759109	0	0	0	0	0	0.189467051	0.124953448	0
Statewide	2017	Annual	MCY	GAS	Aggregate	Aggregate	703633.1	6219570	1408003	2.711410552	0	4.437246692	1.750139289	0.881180659	0.337833227	0.973627621	2.965719928	0	4.768171717
Statewide	2017	Annual	MDV	GAS	Aggregate	Aggregate	4042745	1.5E+08	25092279	0.06556864	0	2.842706296	0.560613031	1.299874103	0.111523027	0.493460533	0.094027133	0	3.036051978
Statewide	2017	Annual	MDV	DSL	Aggregate	Aggregate	3937.112	149698.5	23520.14	0.030059788	0	0	0	0	0	0	0.034221069	0	0
Statewide	2017	Annual	MH	GAS	Aggregate	Aggregate	178394.4	2257332	17846.57	0.133244163	0	0.060772521	0.137943961	0.009652471	0.019095345	0.050168201	0.164046884	0	0.064970842
Statewide	2017	Annual	MH	DSL	Aggregate	Aggregate	32257.05	398721.2	3225.705	0.190740902	0	0	0	0	0	0	0.217145828	0	0
Statewide	2017	Annual	Motor Coa	DSL	Aggregate	Aggregate	4192.997	595064.9	0	0.199908621	9.034003445	0	0	0	0	0	0.227580747	10.28452524	0
Statewide	2017	Annual	OBUS	GAS	Aggregate	Aggregate	16942.45	790384.6	772892.1	0.159649655	1.873167691	34.19139376	0.043862251	1.294542256	0.305901818	0.020598163	0.192337843	1.981385276	36.53055207
Statewide	2017	Annual	PTO	DSL	Aggregate	Aggregate	0	562439.1	0	0.229574657					0		0.261353271		
Statewide	2017	Annual	SBUS	GAS	Aggregate	Aggregate	4283.913	188405.3	17128.26	1.361422254	0.772040179	10.77967512	0.169828388	1.157668353	0.211830207	0.06169573	1.486025412	0.816626715	11.53598478
Statewide	2017	Annual	SBUS	DSL	Aggregate	Aggregate	14519.99	531995.5	0	0.227240392	0.745203034	0	0	0	0	0	0.258695888	0.848356929	0
Statewide	2017	Annual	T6 Ag	DSL	Aggregate	Aggregate	8974.03	297089.8	0	0.303110971	0.564331958	0	0	0	0	0	0.345068767	0.642448977	0
Statewide	2017	Annual	T6 Public	DSL	Aggregate	Aggregate	22334.57	404185.1	0	0.088356013	0.14960613	0	0	0	0	0	0.100586594	0.170315191	0
Statewide	2017	Annual	T6 CAIRP h	DSL	Aggregate	Aggregate	282.409	17976.52	0	0.104549476	0.160194284	0	0	0	0	0	0.11902162	0.182368998	0
Statewide	2017	Annual	T6 CAIRP s	DSL	Aggregate	Aggregate	839.9441	59947.43	0	0.132004733	0.21280938	0	0	0	0	0	0.150277341	0.24226728	0
Statewide	2017	Annual	T6 OOS he	DSL	Aggregate	Aggregate	161.911	10306.31	0	0.104549476	0.160194284	0	0	0	0	0	0.11902162	0.182368998	0
Statewide	2017	Annual	T6 OOS sm	DSL	Aggregate	Aggregate	481.5575	34369.11	0	0.132004733	0.21280938	0	0	0	0	0	0.150277341	0.24226728	0
Statewide	2017	Annual	T6 instate	DSL	Aggregate	Aggregate	12453.38	649093.8	0	0.1118594	0.117570579	0	0	0	0	0	0.127343412	0.133845154	0
Statewide	2017	Annual	T6 instate	DSL	Aggregate	Aggregate	25747.27	1645922	0	0.191656257	0.217790486	0	0	0	0	0	0.218186059	0.24793789	0
Statewide	2017	Annual	T6 instate	DSL	Aggregate	Aggregate	52530.54	2827399	0	0.111545115	0.128312942	0	0	0	0	0	0.126985623	0.146074518	0
Statewide	2017	Annual	T6 instate	DSL	Aggregate	Aggregate	115404.4	7577429	0	0.178255801	0.216740365	0	0	0	0	0	0.20293066	0.246742407	0
Statewide	2017	Annual	T6 utility	DSL	Aggregate	Aggregate	3000.746	59629.38	0	0.074009025	0.15804074	0	0	0	0	0	0.084253641	0.179917352	0
Statewide	2017	Annual	T6TS	GAS	Aggregate	Aggregate	57053.22	2874092	1141521	0.194734783	1.135615577	27.49380334	0.066375106	2.741674316	0.238384824	0.03536874	0.22803438	1.199557418	29.43273397
Statewide	2017	Annual	T7 Ag	DSL	Aggregate	Aggregate	11287.9	752924.3	0	0.332036861	4.355381354	0	0	0	0	0	0.377998692	4.958270135	0
Statewide	2017	Annual	T7 CAIRP	DSL	Aggregate	Aggregate	37100.78	8883945	0	0.222912029	26.90860631	0	0	0	0	0	0.253768377	30.63339997	0
Statewide	2017	Annual	T7 CAIRP c	DSL	Aggregate	Aggregate	1861.639	441642.6	0	0.229848008	26.44076978	0	0	0	0	0	0.26166446	30.10080369	0
Statewide	2017	Annual	T7 NNOOS	DSL	Aggregate	Aggregate	36009.29	9994106	0	0.181052969	38.03166429	0	0	0	0	0	0.206115023	43.29615478	0
Statewide	2017	Annual	T7 NOOS	DSL	Aggregate	Aggregate	13511.16	3235307	0	0.222779037	33.33811558	0	0	0	0	0	0.253616975	37.95290685	0
Statewide	2017	Annual	T7 other p	DSL	Aggregate	Aggregate	1533.438	239774.7	0	0.478751702	6.392353981	0	0	0	0	0	0.545022369	7.277208413	0
Statewide	2017	Annual	T7 POAK	DSL	Aggregate	Aggregate	3158.545	533867.8	0	0.485869034	10.7866238	0	0	0	0	0	0.55312491	12.2797501	0
Statewide	2017	Annual	T7 POLA	DSL	Aggregate	Aggregate	17288.41	2863921	0	0.418190006	13.02006193	0	0	0	0	0	0.476077489	14.8223494	0
Statewide	2017	Annual	T7 Public	DSL	Aggregate	Aggregate	13978.57	346929.6	0	0.133620869	5.219472119	0	0	0	0	0	0.152117188	5.941971695	0
Statewide	2017	Annual	T7 Single	DSL	Aggregate	Aggregate	30510.63	2346265	0	0.141283602	2.981618604	0	0	0	0	0	0.160840626	3.394345816	0
Statewide	2017	Annual	T7 single c	DSL	Aggregate	Aggregate	14873.85	1142471	0	0.139399142	2.889843362	0	0	0	0	0	0.158695311	3.289866689	0
Statewide	2017	Annual	T7 SWCV	DSL	Aggregate	Aggregate	12978.53	646440.9	0	0.121529239	5.067175927	0	0	0	0	0	0.138351788	5.768594073	0
Statewide	2017	Annual	T7 tractor	DSL	Aggregate	Aggregate	60169.29	9514053	0	0.216836891	3.591470545	0	0	0	0	0	0.246852294	4.088615829	0
Statewide	2017	Annual	T7 tractor	DSL	Aggregate	Aggregate	11078.44	851796.8	0	0.209224951	3.400053835	0	0	0	0	0	0.23818668	3.870702474	0
Statewide	2017	Annual	T7 utility	DSL	Aggregate	Aggregate	1429.747	35615.05	0	0.106234145	6.151109895	0	0	0	0	0	0.120939487	7.002570385	0
Statewide	2017	Annual	T7IS	GAS	Aggregate	Aggregate	3962.139	576464	79274.47	0.672170256	0	57.09373085	0.058024198	3.201486312	0.099662452	0.032143344	0.796635796	0	61.1805954
Statewide	2017	Annual	UBUS	GAS	Aggregate	Aggregate	3661.055	459802.5	14644.22	1.703153642	0	17.07913503	0.106402356	1.906520103	0.105459204	0.054637982	1.831728552	0	18.24915951
Statewide	2017	Annual	UBUS	DSL	Aggregate	Aggregate	14962.41	1848637	59849.66	0.568182474	0	0	0	0	0	0	0.646837951	0	0
Statewide	2017	Annual	All Other B	DSL	Aggregate	Aggregate	10750.92	581371	0	0.123367879	0.144578195	0	0	0	0	0	0.140444939	0.164591269	0

TOG_DIURN (gms/vehicle/day)	TOG_HTSK (gms/vehicle/day)	TOG_RUNLS (gms/mile)	TOG_RESTL (gms/vehicle/day)	CO_RUNEX (gms/mile)	CO_IDLEX (gms/vehicle/day)	CO_STREX (gms/vehicle/day)	NOX_RUNEX (gms/mile)	NOX_IDLEX (gms/vehicle/day)	NOX_STREX (gms/vehicle/day)	CO2_RUNEX (gms/mile)	CO2_IDLEX (gms/vehicle/day)	CO2_STREX (gms/vehicle/day)	CO2_RUNEX_Pavley (gms/mile)	CO2_IDLEX_Pavley (gms/vehicle/day)
0.321370547	0.784104697	0.048423403	0.270620254	1.036836421	0	13.71294984	0.100691515	0	0.865213469	349.6157359	0	465.5920214	273.4671557	0
0	0	0	0	0.177481801	0	0	0.461246084	0	0	345.8018571	0	0	270.2072669	0
0.942349936	1.776548502	0.172731265	0.690898693	2.591951334	0	32.53258	0.274577956	0	1.788252851	402.8539632	0	513.7872243	327.1534055	0
0	0	0	0	0.260074098	0	0	0.547913247	0	0	352.543748	0	0	272.2606262	0
0.427017432	0.987149965	0.0821175	0.370812142	1.44815995	0	20.11712202	0.179332615	0	1.794076903	475.4605771	0	630.8678847	397.3937798	0
0	0	0	0	0.188234937	0	0	0.503092599	0	0	347.0531059	0	0	279.4854308	0
0.05571208	1.571875117	0.235572034	0.029562144	2.13812287	3.28025713	102.4580959	0.472879823	0.034116651	27.2608344	789.4519755	116.3644526	867.3021959	749.9793767	110.54623
0	0	0	0	1.000450885	0.909739948	0	3.719434141	2.596080196	0	522.6612684	141.7534114	0	496.528205	134.6657408
0.047320501	1.421270377	0.195785153	0.026226072	1.484115465	3.280536042	86.37784796	0.394590004	0.034121931	26.0680462	770.1201101	116.3644525	878.1042371	731.6141046	110.5462298
0	0	0	0	0.934109989	0.909739983	0	3.538248143	2.596080277	0	522.2951415	141.7534149	0	496.1803844	134.6657441
1.750139289	0.881180659	0.337833227	0.973627621	26.44804879	0	20.95450243	1.238267703	0	0.624485948	158.9716104	0	88.93185868	151.0230299	0
0.560613031	1.299874103	0.111523027	0.493460533	2.307347951	0	33.82926654	0.32399106	0	3.159668284	603.5811262	0	786.7701217	523.5643999	0
0	0	0	0	0.166522851	0	0	0.387026498	0	0	347.1426637	0	0	294.8844928	0
0.137943961	0.009652471	0.019095345	0.050168201	4.278280964	0	1.069403678	0.794374284	0	0.102536856	646.0211623	0	3.745825541	613.7201042	0
0	0	0	0	0.655068619	0	0	6.922706593	0	0	1163.8845	0	0	1105.690275	0
0	0	0	0	0.950103484	50.72017631	0	5.669833022	110.3886191	0	1731.517852	11913.39374	0	1644.94196	11317.72406
0.043862251	1.294542256	0.305901818	0.020598163	3.0679168	11.44182553	563.3773641	1.148326006	0.118638352	75.18643506	651.2559174	407.4009421	1688.592074	618.6931216	387.030895
		0		0.782836723			8.769500285			2150.201279			2042.691215	
0.169828388	1.157668353	0.211830207	0.06169573	20.49089838	4.709614294	156.5925013	2.186245595	0.048939811	10.18393698	742.1199445	167.2485853	532.3791804	705.0139473	158.8861561
0	0	0	0	0.679274454	6.802353823	0	10.32322093	51.19287494	0	1297.804976	3755.344205	0	1232.914727	3567.576995
0	0	0	0	0.957278813	3.760845467	0	4.524374528	7.6321939	0	1183.27675	685.3319919	0	1124.112913	651.0653923
0	0	0	0	0.301963753	1.513307854	0	5.684546018	8.460998788	0	1177.357793	719.7780291	0	1118.489903	683.7891276
0	0	0	0	0.402825288	1.87978329	0	3.077480467	6.472955804	0	1150.800997	740.8980432	0	1093.260948	703.8531411
0	0	0	0	0.507586263	2.499591896	0	1.774385203	4.977112102	0	1144.058864	743.989981	0	1086.855921	706.790482
0	0	0	0	0.402825288	1.87978329	0	3.077480467	6.472955804	0	1150.800997	740.8980432	0	1093.260948	703.8531411
0	0	0	0	0.507586263	2.499591896	0	1.774385203	4.977112102	0	1144.058864	743.989981	0	1086.855921	706.790482
0	0	0	0	0.410681744	1.357582351	0	5.728230771	8.755728808	0	1163.00548	733.5998542	0	1104.855206	696.9198615
0	0	0	0	0.706854699	2.529499704	0	3.065373807	6.619174239	0	1149.97094	740.910625	0	1092.472393	703.8650937
0	0	0	0	0.410173022	1.489474831	0	5.040843265	8.185043769	0	1162.977614	735.6613496	0	1104.828733	698.8782821
0	0	0	0	0.655488887	2.523194516	0	2.741650657	6.249437171	0	1151.076838	741.5598172	0	1093.522996	704.4818264
0	0	0	0	0.279899006	1.861771221	0	3.068677373	6.665240847	0	1160.760913	745.1149895	0	1102.722868	707.85924
0.066375106	2.741674316	0.238384824	0.03536874	3.793717	13.03796019	422.169238	1.036007448	0.072658474	39.90231771	645.2352161	252.8923613	1189.131019	612.9734553	240.2477432
0	0	0	0	1.547594966	19.8279544	0	8.283125064	28.33309157	0	1734.681931	3329.95627	0	1647.947834	3163.458457
0	0	0	0	1.145886246	147.2946461	0	3.767121843	148.8212678	0	1702.244197	26745.63252	0	1617.131987	25408.3509
0	0	0	0	1.133876556	144.333307	0	3.9301749	147.1882478	0	1711.94754	26403.5042	0	1626.350163	25083.32899
0	0	0	0	0.935338082	211.8718853	0	2.15526351	200.3583347	0	1694.839527	36545.56761	0	1610.097551	34718.28923
0	0	0	0	1.144956417	182.2536065	0	3.7829433	183.5458865	0	1702.269989	33137.49076	0	1617.15649	31480.61622
0	0	0	0	2.214109897	36.06328393	0	7.531535395	33.19760837	0	1765.900399	6080.742038	0	1677.605379	5776.704936
0	0	0	0	2.219062768	60.85412006	0	7.592431114	56.01850485	0	1770.300122	10260.80173	0	1681.785116	9747.76164
0	0	0	0	2.197589685	73.45434741	0	7.188046997	67.61748772	0	1741.95169	12385.3651	0	1654.854105	11766.09684
0	0	0	0	0.649238405	24.56254204	0	11.98781441	104.6658298	0	1762.838043	8328.033847	0	1674.696141	7911.632155
0	0	0	0	0.668576301	16.52204553	0	7.403424735	30.1062303	0	1728.764283	3667.217761	0	1642.326069	3483.856873
0	0	0	0	0.663457286	15.99540425	0	7.57557461	30.08622963	0	1726.416433	3605.768569	0	1640.095611	3425.480141
0	0	0	0	0.584376855	27.02591885	0	9.908646501	95.03850548	0	1744.023895	8395.539254	0	1656.8227	7975.762291
0	0	0	0	1.0379543	20.00266452	0	6.773201434	29.87341801	0	1724.401999	4052.010939	0	1638.181899	3849.410392
0	0	0	0	1.007532593	18.90158595	0	7.55445618	29.85175857	0	1724.34062	3925.236676	0	1638.123589	3728.974843
0	0	0	0	0.509117608	34.54282691	0	6.169314197	82.21855508	0	1729.899905	8481.277016	0	1643.404909	8057.213166
0.058024198	3.201486312	0.099662452	0.032143344	31.21071607	0	1498.767935	5.083939108	0	83.9577353	594.134786	0	1274.021785	564.4280467	0
0.106402356	1.906520103	0.105459204	0.054637982	16.6549466	0	228.8646188	3.790198567	0	26.91810488	744.1870725	0	606.1553697	706.9777189	0
0	0	0	0	2.589605638	0	0	14.19832573	0	0	2522.741704	0	0	2396.604619	0
0	0	0	0	0.453937624	1.679774999	0	5.027653571	7.248845275	0	1163.160233	734.1041648	0	1105.002221	697.3989566

CO2_STREX_Pavley (gms/vehicle/day)	PM10_RUNEX (gms/mile)	PM10_IDLEX (gms/vehicle/day)	PM10_STREX (gms/vehicle/day)	PM10_PMTW (gms/mile)	PM10_PMBW (gms/mile)	PM2_5_RUNEX (gms/mile)	PM2_5_IDLEX (gms/vehicle/day)	PM2_5_STREX (gms/vehicle/day)	PM2_5_PMTW (gms/mile)	PM2_5_PMBW (gms/mile)	SOX_RUNEX (gms/mile)	SOX_IDLEX (gms/vehicle/day)	SOX_STREX (gms/vehicle/day)
377.2889907	0.001769955	0	0.019042086	0.007999959	0.036749815	0.001629739	0	0.017550844	0.00199999	0.01574992	0.003507196	0	0.004895046
0	0.021678337	0	0	0.007999959	0.036749815	0.019944071	0	0	0.00199999	0.01574992	0.003301239	0	0
430.1539422	0.003795202	0	0.030702736	0.007999958	0.036749815	0.003496552	0	0.028300131	0.00199999	0.01574992	0.004064733	0	0.005716524
0	0.044823232	0	0	0.007999958	0.036749815	0.041237375	0	0	0.00199999	0.01574992	0.003365601	0	0
538.5210021	0.001880838	0	0.019262295	0.007999958	0.036749815	0.00173385	0	0.017784322	0.00199999	0.015749919	0.004770166	0	0.006658885
0	0.023494558	0	0	0.007999959	0.036749815	0.021614994	0	0	0.00199999	0.01574992	0.003313184	0	0
823.9370861	0.002020678	0	0.024125818	0.007999958	0.036749815	0.001867818	0	0.022176225	0.00199999	0.01574992	0.007918651	0.001229983	0.010551121
0	0.040981703	0.029023741	0	0.011999938	0.076439599	0.037703168	0.026701845	0	0.002999985	0.032759826	0.004989648	0.001353266	0
834.1990253	0.001534512	0	0.020779925	0.007999958	0.036749815	0.001406976	0	0.018761146	0.00199999	0.01574992	0.00771357	0.00122999	0.01037122
0	0.037893029	0.028405736	0	0.011999938	0.089179533	0.034861588	0.02613328	0	0.002999985	0.038219796	0.004986153	0.001353266	0
84.48526574	0.000491573	0	0.002932372	0.007999866	0.036749237	0.000402398	0	0.002355447	0.001999966	0.015749672	0.002090021	0	0.002734491
696.3003165	0.002203961	0	0.021902933	0.007999959	0.036749815	0.002030397	0	0.020214624	0.00199999	0.01574992	0.006063737	0	0.008474324
0	0.023564325	0	0	0.007999959	0.036749815	0.02167918	0	0	0.00199999	0.01574992	0.003314039	0	0
3.558534264	0.001936521	0	0.00014511	0.007999959	0.036749815	0.001768618	0	0.000129109	0.00199999	0.01574992	0.006520375	0	0.000844284
0	0.186449162	0	0	0.011999938	0.130339312	0.171533233	0	0	0.002999985	0.055859694	0.011111163	0	0
0	0.076178301	0.214429582	0	0.011999937	0.130339319	0.070084037	0.197275215	0	0.002999984	0.055859708	0.01651949	0.113659346	0
1604.16247	0.000704725	0	0.042128158	0.007999958	0.036749815	0.000649803	0	0.037573058	0.00199999	0.015749919	0.006554486	0.004305269	0.026771329
	0.060259939			0	0	0.055439144			0	0	0.020513925		
505.7602214	0.007022242	0	0.02977034	0.007999959	0.036749815	0.00620327	0	0.025822135	0.00199999	0.01574992	0.007773357	0.001767715	0.011146677
0	0.115649834	0.17024715	0	0.011999937	0.744796108	0.106397848	0.156627378	0	0.002999984	0.319198332	0.012381666	0.035827739	0
0	0.16479114	0.158270531	0	0.011999937	0.130339319	0.151607849	0.145608889	0	0.002999984	0.055859708	0.011289013	0.006538388	0
0	0.048805145	0.023476984	0	0.011999937	0.130339319	0.044900733	0.021598825	0	0.002999984	0.055859708	0.011232544	0.006867019	0
0	0.045392746	0.010534984	0	0.011999937	0.130339319	0.041761327	0.009692185	0	0.002999984	0.055859708	0.010979179	0.007068514	0
0	0.071821767	0.018563535	0	0.011999937	0.130339319	0.066076026	0.017078452	0	0.002999984	0.055859708	0.010914856	0.007098012	0
0	0.045392746	0.010534984	0	0.011999937	0.130339319	0.041761327	0.009692185	0	0.002999984	0.055859708	0.010979179	0.007068514	0
0	0.071821767	0.018563535	0	0.011999937	0.130339319	0.066076026	0.017078452	0	0.002999984	0.055859708	0.010914856	0.007098012	0
0	0.052811121	0.012337357	0	0.011999937	0.130339319	0.048586231	0.011350369	0	0.002999984	0.055859708	0.011095616	0.006998886	0
0	0.122155718	0.032142365	0	0.011999937	0.130339319	0.112383261	0.029570976	0	0.002999984	0.055859708	0.01097126	0.007068634	0
0	0.05037288	0.011865026	0	0.011999937	0.130339319	0.046343049	0.010915824	0	0.002999984	0.055859708	0.01109535	0.007018553	0
0	0.107959251	0.029119497	0	0.011999937	0.130339319	0.099322511	0.026789937	0	0.002999984	0.055859708	0.010981811	0.007074827	0
0	0.03136734	0.010146902	0	0.011999937	0.130339319	0.028857953	0.00933515	0	0.002999984	0.055859708	0.011074202	0.007108745	0
1129.674468	0.001092655	0	0.064070364	0.007999959	0.036749815	0.00098435	0	0.05460962	0.00199999	0.01574992	0.006506844	0.002764676	0.019367148
0	0.184578674	0.392522657	0	0.035999812	0.061739677	0.16981238	0.361120844	0	0.008999953	0.026459862	0.016549677	0.03176934	0
0	0.091183316	0.616458281	0	0.035999812	0.061739677	0.083888651	0.567141619	0	0.008999953	0.026459862	0.016240205	0.255165837	0
0	0.087270211	0.625709111	0	0.035999812	0.061739677	0.080288595	0.575652382	0	0.008999953	0.026459862	0.01633278	0.251901773	0
0	0.070879142	0.686421089	0	0.035999812	0.061739677	0.06520881	0.631507402	0	0.008999953	0.026459862	0.016169561	0.348661799	0
0	0.091156232	0.773922247	0	0.035999812	0.061739677	0.083863733	0.712008467	0	0.008999953	0.026459862	0.016240451	0.316147153	0
0	0.112226751	0.09313489	0	0.035999812	0.061739677	0.103248611	0.085684099	0	0.008999953	0.026459862	0.016847515	0.058013122	0
0	0.111183967	0.157158228	0	0.035999812	0.061739677	0.10228925	0.14458557	0	0.008999953	0.026459862	0.016889491	0.097892845	0
0	0.125110048	0.189698825	0	0.035999812	0.061739677	0.115101244	0.174522919	0	0.008999953	0.026459862	0.016619033	0.118162173	0
0	0.102737987	0.463576785	0	0.035999812	0.061739677	0.094518948	0.426490642	0	0.008999953	0.026459862	0.016818299	0.079453336	0
0	0.062739225	0.073803986	0	0.035999812	0.061739677	0.057720087	0.067899667	0	0.008999953	0.026459862	0.016493219	0.034986972	0
0	0.063621076	0.073390737	0	0.035999812	0.061739677	0.05853139	0.067519478	0	0.008999953	0.026459862	0.01647082	0.034400718	0
0	0.067939763	0.230020998	0	0.035999812	0.061739677	0.062504582	0.211619318	0	0.008999953	0.026459862	0.016638803	0.080097369	0
0	0.087540962	0.077078148	0	0.035999812	0.061739677	0.080537685	0.070911896	0	0.008999953	0.026459862	0.016451601	0.038658079	0
0	0.089021793	0.076373632	0	0.035999812	0.061739677	0.08190005	0.070263741	0	0.008999953	0.026459862	0.016451016	0.037448593	0
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APPENDIX R

BOATING OPPORTUNITIES

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APPENDIX R

BOATING OPPORTUNTIES

BACKGROUND

Activity Participation

A 2005 visitor survey in Yosemite National Park asked respondents to check participation in common recreation activities, including sightseeing/taking a scenic drive (87%), visiting visitor center (55%), day hiking (48%), painting/photographing (45%), picnicking (30%), camping (13%), climbing (5%), and overnight backpacking (3%). Boating and swimming were not on the activity list in the survey, but were the two most common open-ended responses provided by respondents. Based on a comparison of daily park visits and boating use, the percentage of visitors who boat is probably under 5% even in the peak use summer season, roughly comparable to the numbers who climb or backpack.

Current Reaches Open to Boating

Commercial and private (non-commercial) boating is currently allowed on a 2.4 mile reach of the Merced in Yosemite Valley between Stoneman Bridge and Sentinel Beach Picnic Area. Private paddling is also allowed on the main stem Merced in El Portal and the South Fork Merced near Wawona. The El Portal reach is roughly 3 miles of Class IV water from the park boundary to Foresta Bridge (and continues downstream on the Forest Service-managed segment of the river). The South Fork reaches include two short tubing runs in the vicinity of Wawona Swinging Bridge and Wawona Campground, and a 23 mile Class V reach from Wawona to El Portal (run by highly skilled kayakers with several portages, typically an overnight trip, mostly downstream of the park boundary).

Seasonality and Flows

Boating on most reaches typically occurs from early May to early August. During periods of high flows (over 6.5 feet at Sentinel Bridge), boating in Yosemite Valley is prohibited for safety reasons (e.g., limited space under bridges). These high flows typically occur for a week or two in late May or early June. By mid-July in a dry year, early August in most years, low flows reduce boating to a few private trips per day. Few boaters use the river at flows less than 100 cfs at Happy Isles. The commercial rafting concession typically operates for about two to three months within this season, from just after the high flow peak and concluding when flows reach approximately 150 cfs at Happy Isles. Kayaking on the Class V SF Merced is more constrained by flows (boaters probably seek medium-low flows during the early to mid-summer run-off).

Current Use Levels on Open Boating Reaches

Peak use levels on the Yosemite Valley reach may exceed 300 boats per day, with about two-thirds commercial rafts (Whittaker and Shelby, 2012). However, more common peak use levels have been about 150 to 250 boats per day. Boating use is allowed only between 10 am and 6 pm and when combined water

and air temperature exceeds 100 degrees, with many preferring to boat during warmer afternoons in any case. This creates relatively higher afternoon use peaks, when peaks of 40 boats per hour may pass a given location. Boats also tend to cluster on a few larger beaches toward the end of the boating reach, which may increase boating congestion at specific locations (e.g., Swinging Bridge in Yosemite Valley).

Use levels have not been monitored for the Main Stem in El Portal or on the South Fork. Anecdotal information suggests peak use levels do not exceed a dozen boaters/tubers using the South Fork reaches adjacent to Wawona Campground or Wawona Swinging Bridge at one time on peak summer days, and there are unlikely to be more than a dozen kayaking trips per year on the Class V reach below Wawona Campground. The Class IV reach on the Main Stem in El Portal is boated regularly during spring and early summer higher flows, but probably does not exceed more than a few trips per day.

Potential Use Levels on Currently Closed Reaches

There is demand for additional boating opportunities on other (currently closed) segments of the Merced River. Boating demand on reaches upstream of Happy Isles on the Main Stem, upstream of Wawona on the South Fork, and in Merced Gorge are likely to be very low because of challenging whitewater or the need to carry-in boats on trails. In contrast, boating on the currently closed and road accessible reaches in Yosemite Valley might attract substantial use, particularly the Class II-III reach from Clark's Bridge to Stoneman Bridge, the Class I reach from Sentinel Beach to El Capitan Bridge, or the Class III-IV reach from El Capitan to Pohono.

PROPOSED BEST MANAGEMENT PRACTICES FOR RIVER USE UNDER THE PREFERRED ALTERNATIVE

No motorized craft would be allowed on any river segment, as provided in 36 CFR 7.16(i).

Boaters would be prohibited from using sensitive resource areas (steep or vegetated banks) when they stop along the river. This should minimize potential impacts from boaters and support natural restoration. Specific put-in and take-out locations would be identified; boaters would not be allowed to use other locations for access.

Large wood (LW) would not be removed to accommodate paddling use, except where safety, resource management, and other issues warrant mitigation (see detailed BMP on large wood management in the river).

Swimming and water play (see definition below) would be allowed on all segments of the river in all alternatives, except where noted in the Superintendents Compendium such as the Emerald Pool area above Vernal Falls (closed for safety).

Based on monitoring of resource and safety concerns, the NPS may review and change the opportunity for boating access.

Boats would be required to be in good condition and designed to handle the class of whitewater on a reach. Rafts for reaches with Class II or higher whitewater must be high performance multi-chamber craft or high performance single-chamber pack rafts designed for whitewater. The number of people in any vessel would not be allowed to exceed the manufacturer's stated capacity.

Life Preservers and Regulations: Each boater must have a serviceable, US Coast Guard-approved personal floatation device (PFD) Type I, III, or V. These PFDs must be maintained in good condition in compliance with the USCG standards and must be worn and fastened properly at all times while on the river. All PFDs must have a USCG approved label stating the PFD is designed for whitewater rafting, canoeing, sailing, paddling and/or kayaking. General boating or ski vests are prohibited.

First Aid: A first aid kit is required to be carried on all boating trips on Wild segments of river.

Safety Equipment Requirements: Boating use on technical reaches (defined as Class II or higher) have additional equipment requirements. These requirements could include restrictions on vessel type as well as rescue and safety equipment that must be carried. These sections include: Segments 1, 3, 4, 5, 8 and Segment 2a above Stoneman Bridge and Segment 2b. Please consult the Superintendent's Compendium for a comprehensive list of these requirements.

DEFINITIONS

"Boating" refers to the use of watercraft such as canoes, kayaks, or rafts that are propelled by paddle/oar and travel downstream for a substantial distance.

"Swimming and water play" refers to visitors swimming in the river, but includes the use of "water toys" (inner-tubes, floatation mattresses, or other similar inflatables) in a localized area. It is assumed that boating involves floating a distance of approximately 500 feet or more on the river, while water play using water toys occurs over a shorter distance (e.g., the length of a beach or campground)..

Boats include craft such as rafts, kayaks, inflatable kayaks, canoes, and pack rafts.

ALLOWABLE REACHES FOR BOATING

Current regulations stipulate that "all free flowing rivers creeks and streams within Yosemite National Park, except the Main Stem and South Fork of the Merced River as defined in this section are closed to the use of any type of vessel designed to carry passengers upon the water and any other device, such as air mattresses or inner tubes, that may be used." (Yosemite National Park Superintendent's Compendium 2012 36 CFR § 1.5(a)(2); 36 CFR § 1.5(f)) Allowable boating reaches vary by alternative in the plan as specified below. When adopted, the plan will identify additional reaches open to boating.

Guidance from WSR, Secretaries Guidelines and recent court cases indicate that capacities should be used to set both kinds and amounts of use for different reaches. Because many of these segments are open to boating for the first time, the NPS has set initial capacities that allow reasonable access for boating opportunities while protecting river values that include the quality of boating and adjacent riverside experiences. These capacities were based on logical calculations of likely encounters on the new "water trails," estimated congestion impacts and or facility capacities at limited launching areas, and potential for portage trails or other impacts from boating use.

The capacities are expressed as people per day on Wilderness and lower use reaches to be consistent with backcountry permit systems (and it is similar to boats per day in any case because most boaters will use single person kayaks or pack rafts). On the higher use reaches in Yosemite Valley, capacities are expressed as boats per day. These are the "units of use" responsible for a key impact (boats in view at one time) and are more easily managed in higher use settings.

Responsible boating use that is below capacities would likely require little management beyond use monitoring, and/or self-registration or other permitted programs.

Wild River Segments

Segment 1 – Main Stem Above Nevada Fall

Open Section: Headwaters of the Main Stem Merced River to Half Dome Trail and Merced Lake Trail Junction
Segment Capacity: 20 people/day
Management Mechanism: Issued with Wilderness permit for this area

***Rationale for capacity and requiring permits*:** Opening this reach to boating creates a new "water trail" or backcountry route that has not been considered in previous Wilderness quota system decisions. There is a need to identify and track this new use methodically, so backcountry users who plan to boat will have to declare the reaches they will use when they obtain their backcountry permit. This will allow the park to develop use-impact relationships over the long term and adjust capacities if necessary.

***Rationale for permit number*:** These capacities are consistent with other backcountry trails that have identified trailhead quotas and zone capacities based on regular use patterns on specific routes. Existing trailhead quotas for this segment range between 10 and 30 people per day and keep encounter rates on most trail sections lower than about 2 per hour. Boating capacity on this new water trail in this river segment is set in the middle of this range and would achieve similar encounter conditions along the river. Estimated demand suggests that use levels are unlikely to approach the capacity on this reach.

Segment 5 – South Fork Above Wawona

Open Section: Headwaters of the South Fork Merced River to Swinging Bridge
Segment Capacity: 25 people/day
Management Mechanism: Issued with Wilderness permit for this area

***Rationale for requiring permits*:** Opening this reach to boating creates a new "water trail" or backcountry route that has not been considered in previous Wilderness quota system decisions. There is a need to track this new use methodically, so backcountry users who plan to boat will have to declare the reaches they will use when they obtain their backcountry permit. This will allow the park to develop use-impact relationships over the long term and adjust capacities if necessary. This segment of river is only accessed by backcountry travel or by trails that originate in USFS land.

***Rationale for permit number*:** Consistent with other trail head quotas in this area (which range from 10 to 30 people per day), the capacity is 20 people per day. This segment of river passes through two wilderness zones that permit camping: South Fork Zone (#50) and Johnson Creek Zone (#51). The capacities of these corridors are 15 people per day and 5 people per day respectively. Estimated demand suggests that use levels are unlikely to approach the capacity on this reach.

Segment 8 – South Fork Merced River Below Wawona

Open Section: Wawona Campground to Park Line
Segment Capacity: 25 people/day
Management Mechanism: Self-registration and monitor until permitting is necessary to manage use

***Rationale for requiring permits*:** Monitoring through self-registration will help NPS track this use methodically. Use information will allow better estimates of SAR risks and help estimate congestion or parking impacts from allowed boating use. If daily use on this segment is found to be in excess of the stated capacity, a permit system will be implemented to regulate use on this segment.

***Rationale for permit number*:** This section is most often run by boaters who seek a more technical and noted section of the river outside of the park. The section in the park is technical, however it is a fast moving section where boaters read and run the rapids and quickly move downstream. The 25 person capacity will allow groups to access this segment daily but reduces the likelihood of excessive boating encounters. It is also consistent with capacities set in Segment 5 of the South Fork Merced.

Scenic Segments

Segment 3- The Gorge

Open Section: Pohono Bridge to Park Line
Segment Capacity: 10 people/day
Management Mechanism: Self-registration and monitor until permitting is necessary to manage use

***Monitoring Capacity*:** This is a very challenging stretch of water (mostly Class V+) and it is unlikely to attract much use. Monitoring through self-registration will help NPS track this use methodically. Use information will allow better estimates of SAR risks and help estimate congestion or parking impacts from allowed boating use. If daily use on this segment is found to be in excess of the stated capacity, a permit system will be implemented to regulate use on this segment.

***Rationale for capacity*:** Parking at boating access locations is limited to small roadside pull-outs that have primarily been used by visitors for short stops on their scenic drives through the park. Ten boaters per day allows two to three small kayaking groups to access this segment of river daily. Estimated demand suggests that use levels are unlikely to approach the capacity on this very challenging reach.

Segment 2b- West Yosemite Valley

Open Section: Sentinel Beach to Pohono Bridge
Segment Capacity: 45 people/day
Management Mechanism: Monitored until permitting is necessary to manage use

***Rationale for opening the segment to private boating use*:** This segment provides a high quality medium challenge whitewater opportunity that was commonly boated through the mid-1980s. Capacities are set to keep boating densities low and avoid congestion or negatively impact the existing lower density shore-based recreation opportunities in west valley of Yosemite. The 2011 river study showed 43% in support of opening new segments of the valley for boating (22% were opposed).

***Monitoring Capacity*:** Opening this reach to boating creates a new "water trail" in a lower use part of Yosemite Valley (even as many vehicles pass through the reach). There is a need for the park to monitor use and develop use-impact relationships over the long term, which can ensure that use levels are providing high quality experiences and not overwhelming limited parking at existing river access areas. Boating access will be regulated if excessive access leads to impacts in this segment.

***Rationale for capacity*:** The capacity is intended to provide a lower density boating experience than what is offered in the east valley. The primary limiting factors for boating capacities in this area are social conditions (encounters) and very limited parking availability near the take-out (about 15 spaces). Logical calculations (with assumptions about group sizes and craft types) suggest that 45 people per day would probably equate to no more than 25 to 35 boats in 10 to 12 groups, which would produce relatively few on-river encounters. This would be a noticeably lower boating density than proposed for East Valley 2a, but a higher one than found on the wilderness reaches, providing a diversity of visitor opportunities for the entire corridor. Although use is likely to occur during the spring (April, May and June in an average year), parking areas are shared by other park visitors. It is possible that all of the parking spaces at the takeout may be filled up with a boating capacity of 45 (assumes 3 people per vehicle). However, the park would use an education program at registration to encourage boaters to use bicycle shuttles and other alternatives so that other park visitors are not displaced in the springtime.

Recreational Segments

Segment 2a- East Yosemite Valley

Section 1: Clark's Bridge to Stoneman Bridge and through to Sentinel Beach (private only)
Private use allowed: 45 people per day

Section 2: Stoneman Bridge to Sentinel Beach (commercial and private uses)
Commercial use allowed: 50 BAOT (100 boats per day)
Private use allowed: 150 boats per day

Total Segment Capacity: 295 boats per day
Commercial use allocation: Online reservations or at concession reception desks
Private use allocation: Onsite Self-Registration

***Monitoring Capacity*:** This reach is currently open to both private and commercial boating use. Permits for private use are not required; commercial use, however, is monitored through an NPS contract and/or permit. The NPS will monitor boating use in this section. Boating access will be regulated if excessive access leads to impacts in this segment.

***Rationale for Capacity*:** The capacity for this segment is higher than any other river segment; however it is below historical peak use numbers. Commercial use is set 50% below current use; private use remains roughly the same. Overall this will reduce the number of boats in the view-shed, reduce boating congestion at launch areas and high use beaches, and provide a lower density visitor experience for boaters and shore users. The footprint necessary for commercial rafting operations will be reduced and relocated out of the river corridor. The rafting center at Curry Village will be relocated with a put-in near the vicinity of the Lower Rivers day use area.

Existing commercial use averages 140 raft rentals per day with peaks just over 200, and commonly produces just under 100 boats at one time on the segment during peak use. The new capacity will reduce commercial

rafts about 25% to 50 rafts at one time and 100 rafts per day. In the 2011 river use study, this option had more opposition than support (43% opposed vs. 17% support), but more support than for eliminating raft rentals entirely (80% opposed vs. 7% support). Existing private use averages about 90 boats per day with peaks about 130, and may produce as many as 100 boats at one time during early afternoon The proposed capacities would essentially freeze existing private use at current levels, but reduce at one time use on a few peak days to about 75.

Currently during the high boating season, there are about 230 boats per day with peak use at about 330 boats per day. The overall limit for this section would be set at 295 boats per day. This number (295) would likely create a peak number of boats at one time of about 175. This number of boats at one time (175) would create conditions that are below the visitor "acceptability" level as found in the 2011 river study.

Segment 4- El Portal

Open Section: Below Yosemite View Lodge to Foresta Bridge
Segment Capacity: 50 people/day
Management Mechanism: Self-registration and monitor until permitting is necessary to manage use

***Monitoring Capacity*:** Although this reach is currently open, NPS has little information about use or impacts. Monitoring and self-registration at put-in locations will help NPS identify and track this use methodically. This will allow the park to monitor use and develop use-impact relationships over the long term, which can ensure use levels are providing high quality experiences and not overwhelming limited parking at river access areas. Estimated demand suggests that use levels are unlikely to approach this capacity. Boating access will be regulated if excessive use leads to impacts in this segment.

***Rationale for capacity*:** The limiting factors for boating capacities in this area are social conditions (encounters) and limited parking availability near the put-in (about 15 to 20 spaces at Crane Creek and along the road across from the El Portal store). Logical calculations (with assumptions about group sizes and craft types) suggest that 50 people per day will probably produce few on-river encounters (similar to the West Valley reach). Although use is likely to occur during a short high use season (about three months from late April to early July in an average year), parking areas near the put-in are also used by El Portal residents and other park visitors. The 50 person capacity allows many parking spaces to be utilized by boaters (assuming 3 people per vehicle), but should leave several spaces for other users because some boaters will shuttle their vehicles to the take-out.

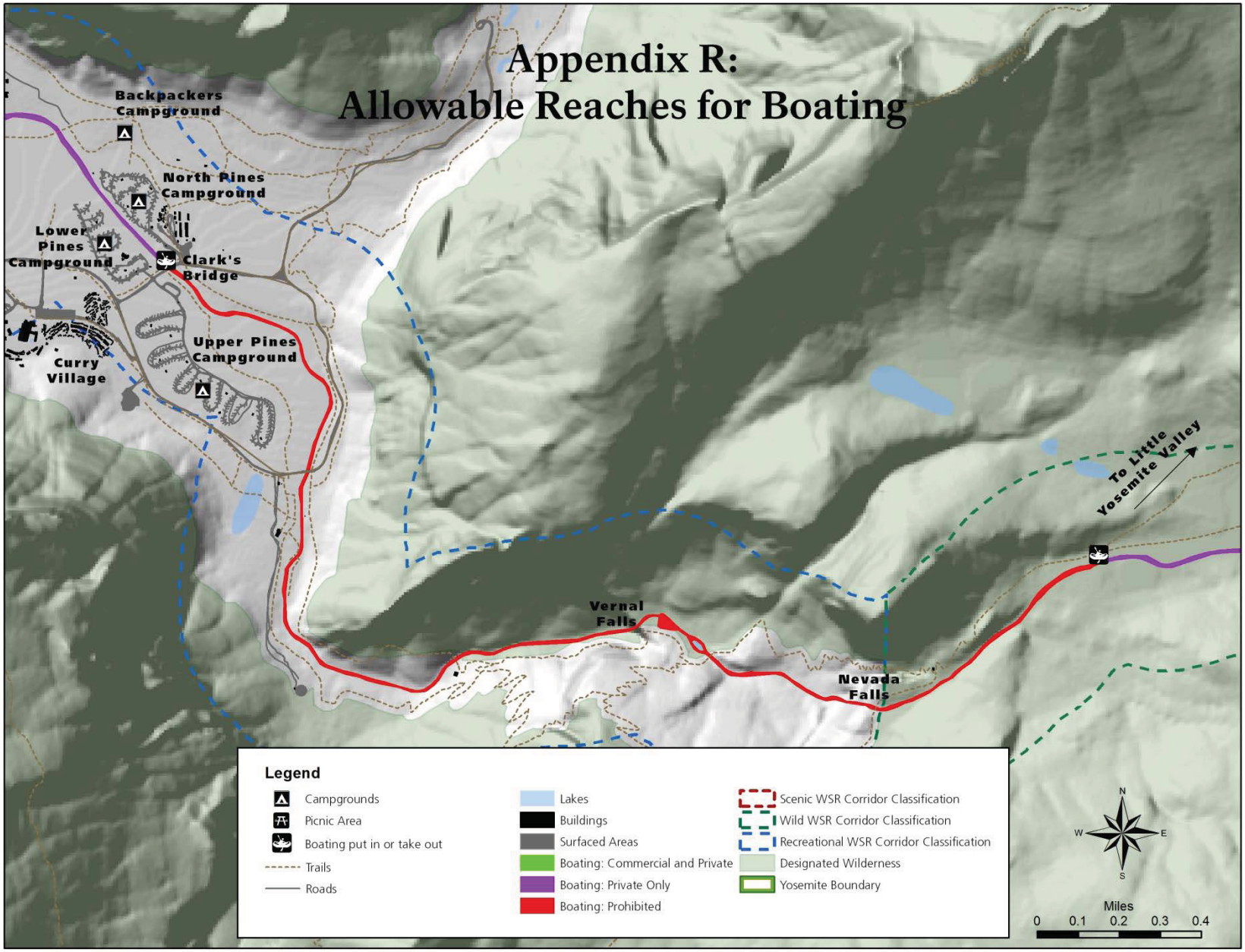
Segment 7- Wawona

Open Section: Swinging Bridge to Wawona Campground
Segment Capacity: 50people/day
Management Mechanism: Self-registration and monitor until permitting is necessary to manage use

***Monitoring Capacity*:** Although this reach is currently open, NPS has little information about use or impacts. Monitoring will help NPS identify and track this use methodically, This will allow the park to develop use-impact relationships over the long term, which can ensure use levels are providing high quality experiences and not overwhelming limited parking at river access areas. A capacity of 50 people per day assumes 15 (60%) of those spaces are used by boaters, with approximately 3 boaters per car. This provides an opportunity similar to the El Portal segment. Boating access will be regulated if excessive use leads to impacts in this segment.

***Rationale for capacity*:** The limiting factors for boating capacities in this area are social conditions (encounters) and limited parking availability near the river access points (about 25 spaces at Wawona Swinging Bridge) and less than 10 non-camping day use spaces at the campground. Logical calculations (with assumptions about group sizes and craft types) suggest that 50 people per day is likely to produce relatively few on-river encounters (similar to the West Valley and El Portal reaches). The 50 person capacity also allows about 15 of the spaces at Wawona Swinging Bridge (60% of the total) to be utilized by boaters (assuming 3 people per vehicle); this should leave several spaces for other users because many boaters will shuttle their vehicles to the take-out. Estimated demand suggests that use levels are unlikely to approach this capacity.

BOATING ACCESS LOCATIONS


Appendix R:
Allowable Reaches for Boating
Backpackers Campground
North Pines Campground
Lower Pines Campground
Clark's Bridge
Curry Village
Upper Pines Campground
Vernal Falls
Nevada Falls
To Little Yosemite Valley
Legend
Campgrounds
Picnic Area
Boating put in or take out
Trails
Roads
Lakes
Buildings
Surfaced Areas
Boating: Commercial and Private
Boating: Private Only
Boating: Prohibited
Scenic WSR Corridor Classification
Wild WSR Corridor Classification
Recreational WSR Corridor Classification
Designated Wilderness
Yosemite Boundary
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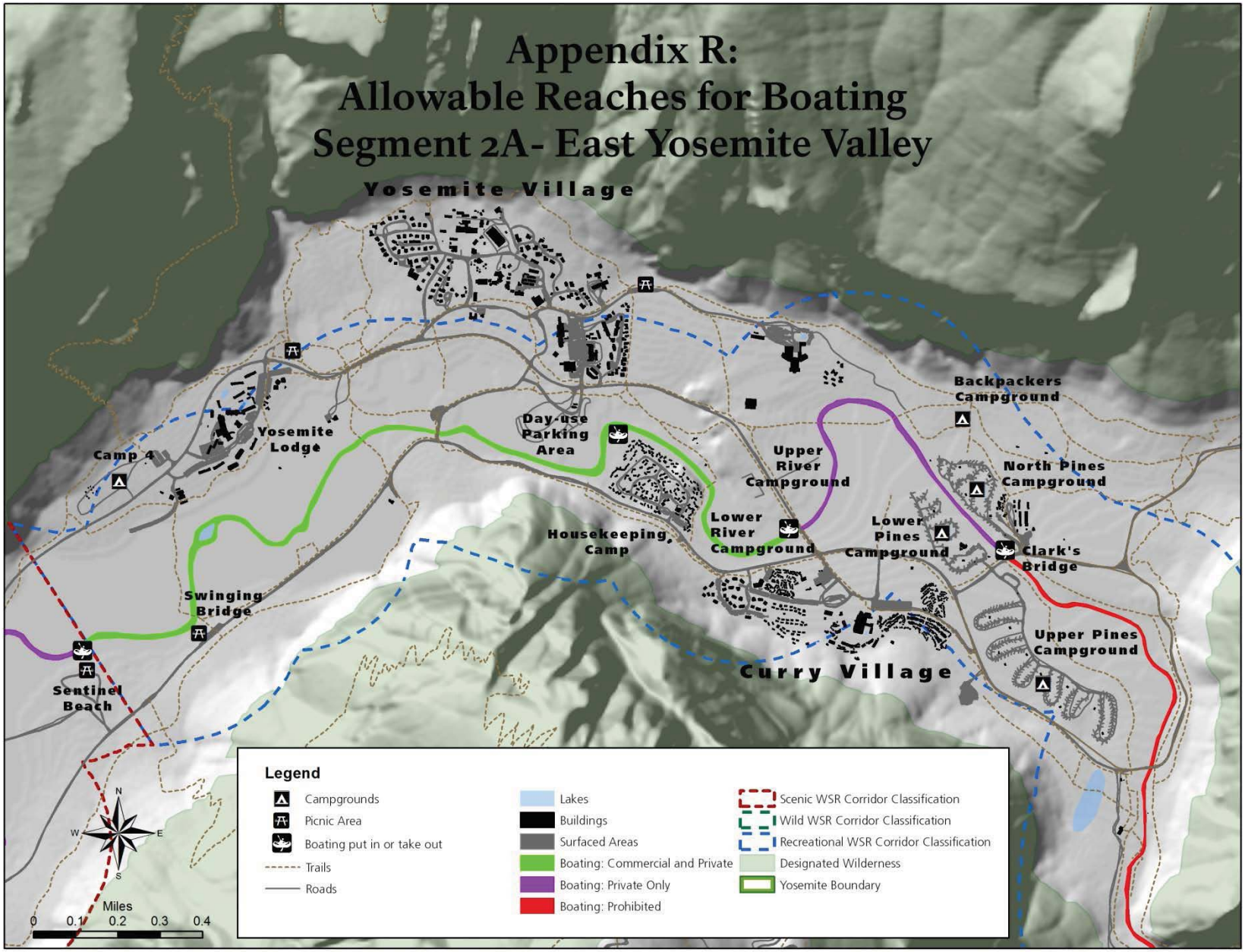
Appendix R:
Allowable Reaches for Boating
Segment 2A- East Yosemite Valley
Yosemite Village
Camp 4
Yosemite Lodge
Day-use Parking Area
Housekeeping Camp
Upper River Campground
Lower River Campground
Lower Pines Campground
Backpackers Campground
North Pines Campground
Clark's Bridge
Upper Pines Campground
Curry Village
Swinging Bridge
Sentinel Beach
Legend
Campgrounds
Picnic Area
Boating put in or take out
Trails
Roads
Lakes
Buildings
Surfaced Areas
Boating: Commercial and Private
Boating: Private Only
Boating: Prohibited
Scenic WSR Corridor Classification
Wild WSR Corridor Classification
Recreational WSR Corridor Classification
Designated Wilderness
Yosemite Boundary
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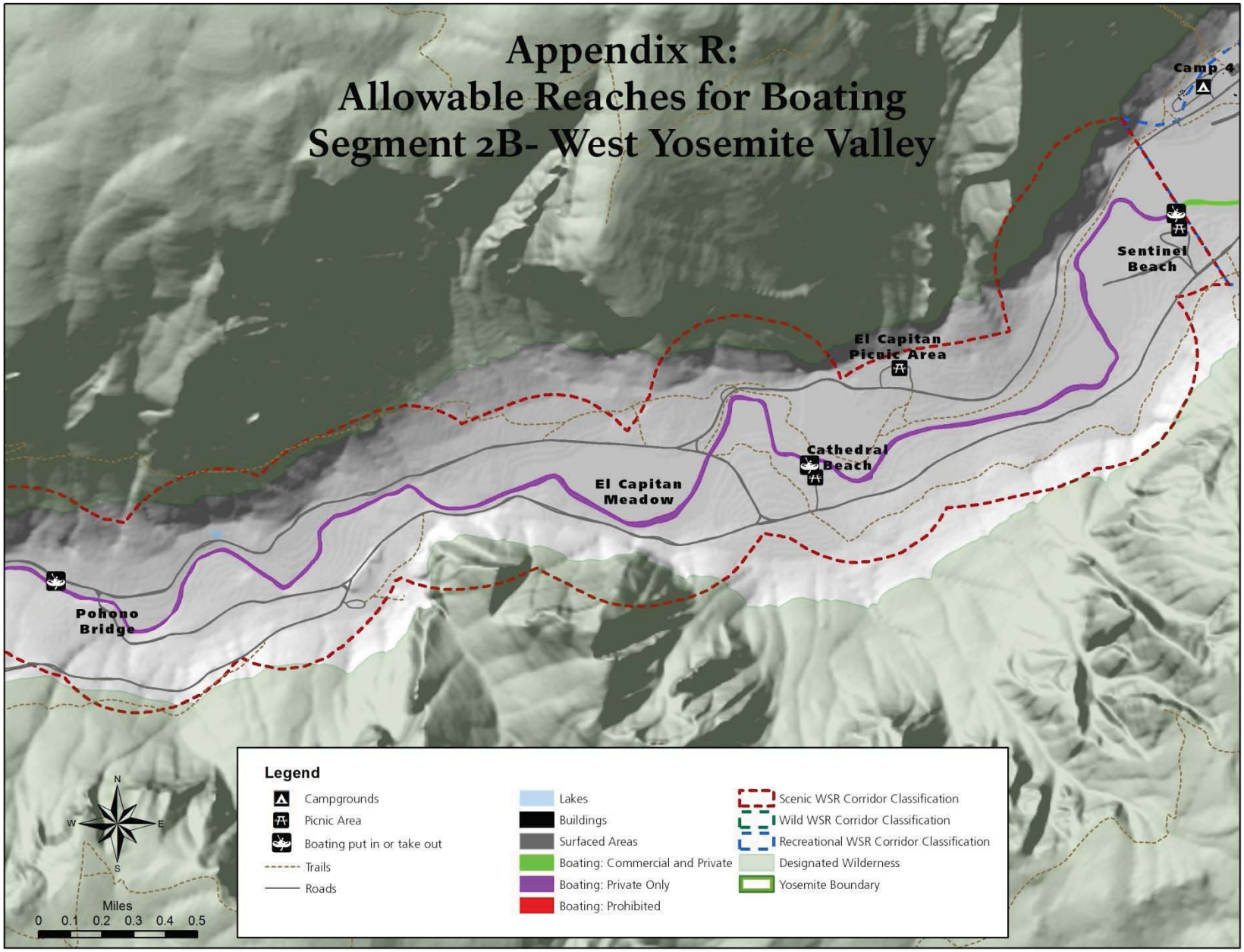
Appendix R:
Allowable Reaches for Boating
Segment 2B- West Yosemite Valley
Camp 4
Sentinel Beach
El Capitan Picnic Area
Cathedral Beach
El Capitan Meadow
Pohono Bridge
Legend
Campgrounds
Picnic Area
Boating put in or take out
Trails
Roads
Lakes
Buildings
Surfaced Areas
Boating: Commercial and Private
Boating: Private Only
Boating: Prohibited
Scenic WSR Corridor Classification
Wild WSR Corridor Classification
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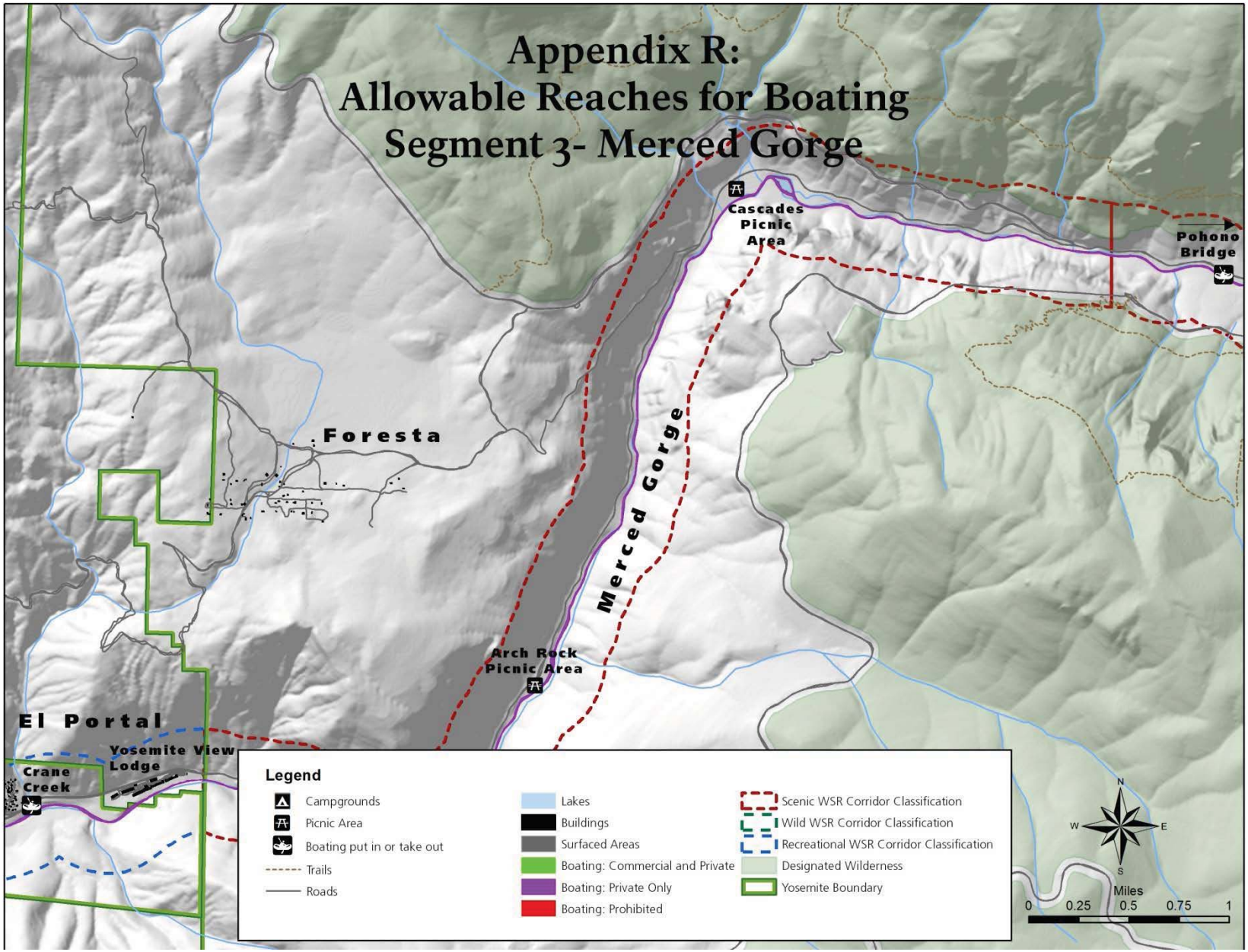
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Allowable Reaches for Boating
Segment 3- Merced Gorge
Cascades Picnic Area
Pohono Bridge
Foresta
Merced Gorge
Arch Rock Picnic Area
El Portal
Yosemite View Lodge
Crane Creek
Legend
Campgrounds
Picnic Area
Boating put in or take out
Trails
Roads
Lakes
Buildings
Surfaced Areas
Boating: Commercial and Private
Boating: Private Only
Boating: Prohibited
Scenic WSR Corridor Classification
Wild WSR Corridor Classification
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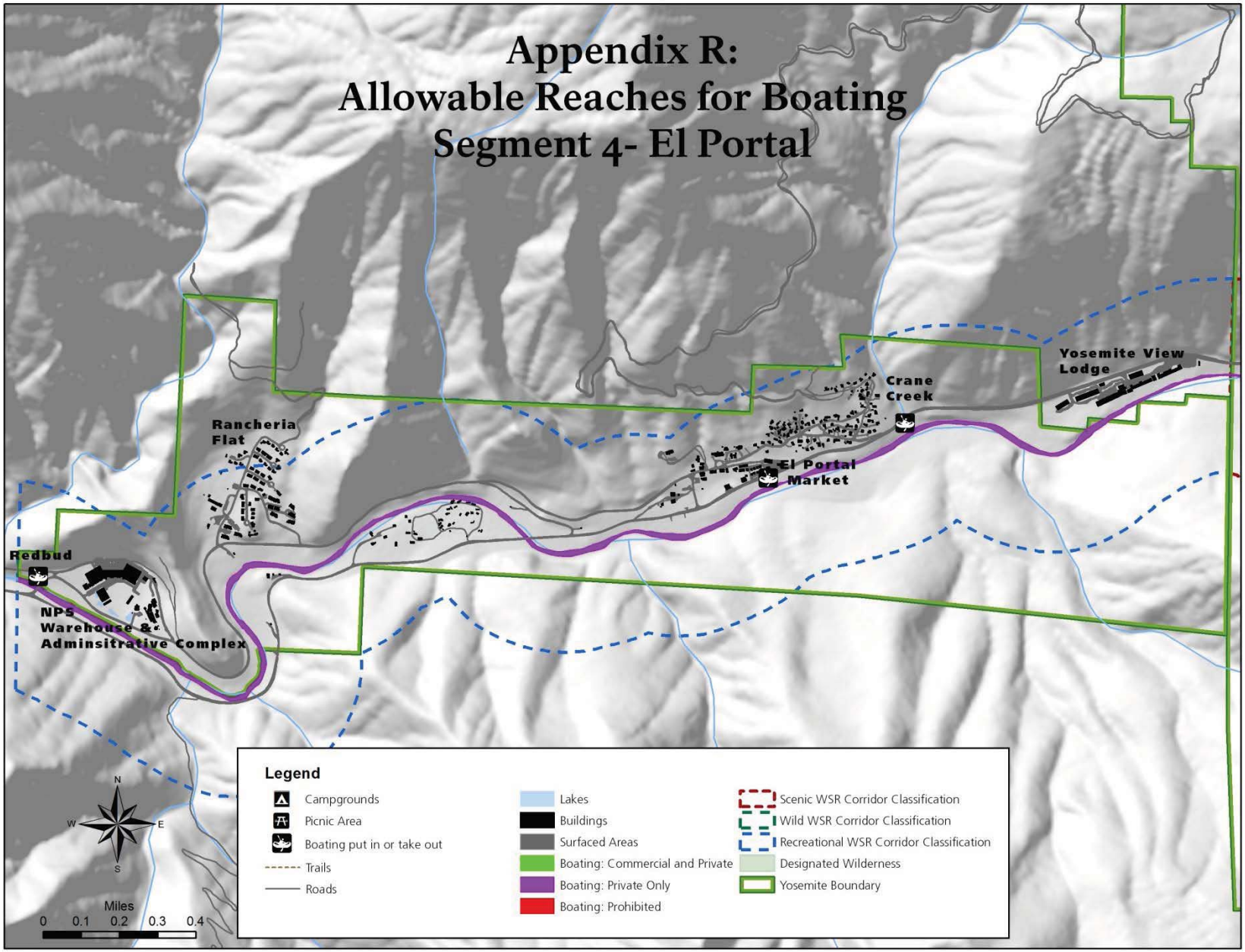
Appendix R:
Allowable Reaches for Boating
Segment 4- El Portal
Yosemite View Lodge
Crane Creek
Rancheria Flat
El Portal Market
Redbud
NPS Warehouse & Adminsitrative Complex
Legend
Campgrounds
Picnic Area
Boating put in or take out
Trails
Roads
Lakes
Buildings
Surfaced Areas
Boating: Commercial and Private
Boating: Private Only
Boating: Prohibited
Scenic WSR Corridor Classification
Wild WSR Corridor Classification
Recreational WSR Corridor Classification
Designated Wilderness
Yosemite Boundary
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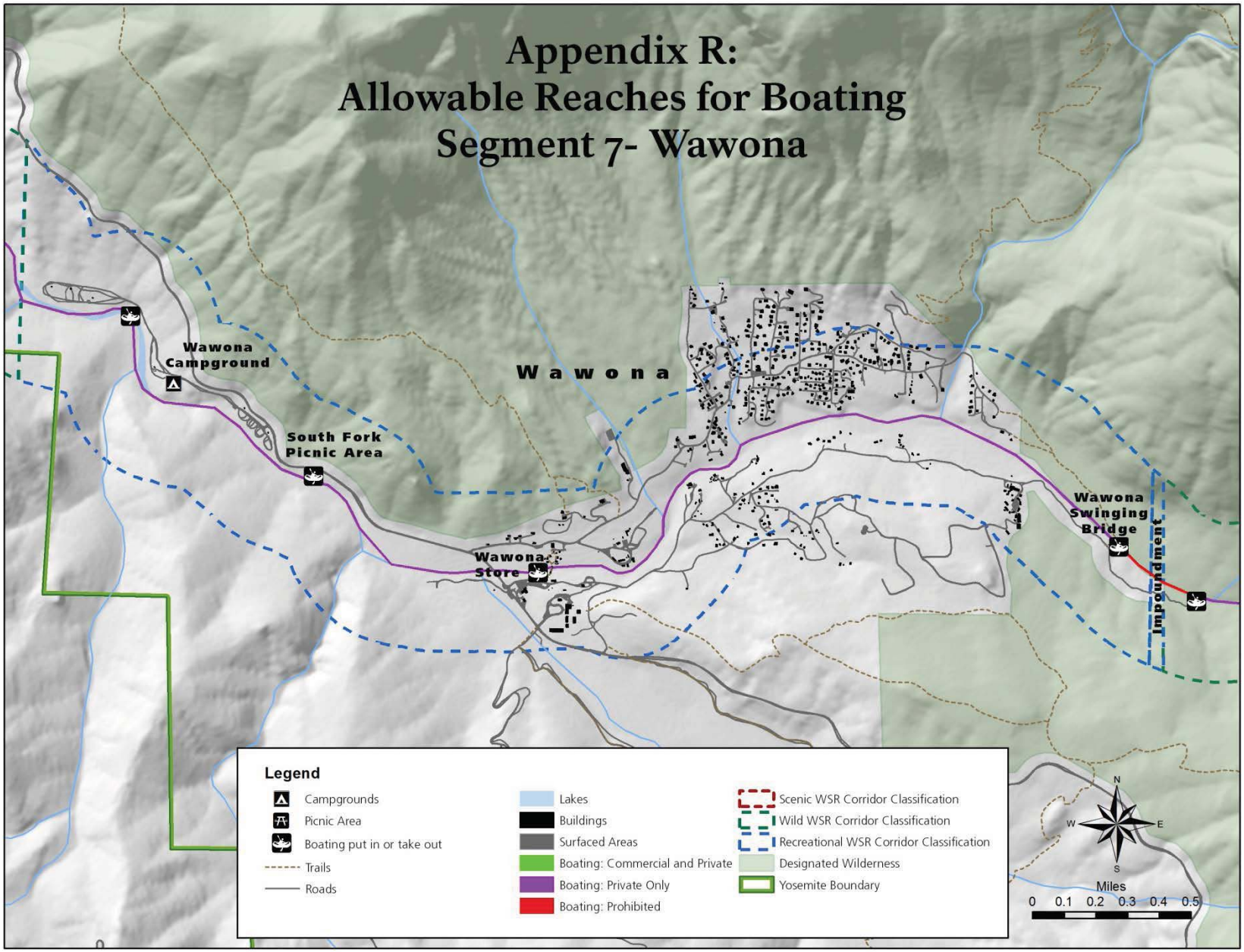
Appendix R:
Allowable Reaches for Boating
Segment 7- Wawona
Wawona Campground
South Fork Picnic Area
Wawona
Wawona Store
Wawona Swinging Bridge
Impoundment
Legend
Campgrounds
Picnic Area
Boating put in or take out
Trails
Roads
Lakes
Buildings
Surfaced Areas
Boating: Commercial and Private
Boating: Private Only
Boating: Prohibited
Scenic WSR Corridor Classification
Wild WSR Corridor Classification
Recreational WSR Corridor Classification
Designated Wilderness
Yosemite Boundary
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Miles
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APPENDIX S

WHITE PAPER ON VISITOR USE AND USER CAPACITY

Doug Whittaker and Bo Shelby
Confluence Research and Consulting

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David Cole, a Research Geographer with the US Forest Service's Aldo Leopold Wilderness Research Institute, was a third capacity expert who contributed to the MRP planning process from 2009-2012, but has recently retired.

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Merced River Plan

White Paper on
Visitor Use and User Capacity

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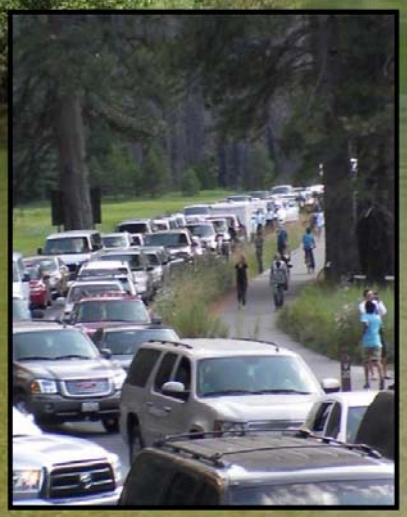
Confluence Research and Consulting

February 2014



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INTRODUCTION

The Wild and Scenic Rivers Act (WSRA) requires agencies to prepare comprehensive management plans to protect and enhance a river's "outstandingly remarkable values" by "addressing resource protection, development of lands and facilities, user capacities, and other management practices" (WSRA, 1968). After more than a decade of legal challenges, NPS is developing a third River Management Plan for the Merced, which was designated a Wild and Scenic River in 1987. Approximately 81 miles of the river flow through Yosemite National Park and the El Portal Administrative Site, both of which are managed by the National Park Service. The Merced River Plan (MRP) considers existing management and five action alternatives, each of which includes capacities. The plan describes the river corridor's outstandingly remarkable values (ORVs), the indicators and standards that define them, and how specific capacities work with other management actions to ensure ORVs are protected or enhanced.

Court rulings, including a 2008 decision from the Ninth Circuit Court concerning the 2005 MRP, ensured capacities would play an important part in the current MRP. The 2009 settlement between NPS and stakeholder groups who were the former plaintiffs included an agreement that NPS would "work directly with Bo Shelby, Doug Whitaker, and David Cole, recognized experts in user capacity, in developing the Merced River Plan." This work included defining ORVs, participating in planning meetings and workshops, participating in public meetings, developing alternatives, and contributing to and/or reviewing capacity-related parts of the Draft and Final EIS. Although we were not "decision makers" (this authority resides with NPS), our role was to provide scientific expertise about capacity concepts, process, and practice, for the benefit of NPS staff, other consultants, stakeholders, and the public.

Taking on difficult management issues with a team that included many individuals over several years, there were inevitable frustrations on all sides. But in the end the plan presents real choices through a diverse range of alternative "futures" for the Merced River Corridor, including Yosemite Valley. Within that effort, we are proud of our roles to help develop and maintain the integrity of the capacity process.

In a plan that covers over 2,500 pages, however, capacity information is spread across several chapters and embedded in the structure of a NEPA document. This means it is sometimes challenging to follow the "capacity narrative." In addition, a planning document does not provide the venue for excursions into capacity concepts; the larger context of the WSRA, NEPA, and other guidelines; the details of the capacity process within the MRP; the questions that arose along the way; and illustrations of specific capacity applications to the iconic features found in Yosemite. This "white paper" allows us to tell that capacity story and put capacity-related information in one place. It also documents how capacity was addressed in the plan, providing a reference for NPS staff, stakeholders, the interested public, the court that will review the plan, or managers of other WSRA rivers charged with developing river plans of their own.

This paper is designed as a reference document that is not intended to be read from start to finish. The goal is to provide easy access to summary information organized into four parts:

Part I: Introduction to User Capacity includes definitions and background, showing how capacities are used in resource management, Wild and Scenic Rivers, and the MRP (beginning on page S-2).

Part II: User Capacity Process explains the capacity decision process in the MRP and describes where readers can find specific capacity-related information in the plan (beginning on page S-11).

Part III. Frequently Asked Questions about User Capacities addresses common issues about user capacities and how they were addressed in the MRP (beginning on page S-16).

Part IV. Illustrative Analyses include examples of technical information and specific capacity assessments for the iconic attractions of Yosemite National Park (beginning on page S-33).

PART I: INTRODUCTION AND BACKGROUND

This part provides background on the capacity concept and the capacity requirement in the Wild and Scenic Rivers Act and related litigation.

Background on Capacity

This background section was adapted from "Capacity Reconsidered – Finding Consensus and Clarifying Differences" by Whittaker, Shelby, Manning, Cole, and Haas (2011).

User capacity, or "carrying capacity," has a long history in natural resource management and has been applied to timber, rangelands, fish and wildlife populations, and recreation use. With philosophical roots that stretch back to Malthus' population principle (1803) and Hardin's "tragedy of the commons" (1968), capacities recognize that environments have limits and that ever-increasing use is likely to degrade conditions and become unsustainable. Applications of capacity in park and recreation settings followed rapid growth in outdoor recreation after World War II, prompting public concern over wild lands being "loved to death" (Wagar 1946; DeVoto 1953; Clawson and Held 1957). Focusing on the "amount" and "type" of use that recreation areas can accommodate without impairing their values, user capacity continues to play a fundamental role in the effort to protect high-quality environments and experiences.

Several natural resource decision-making processes developed in the 1960s and '70s recognized the importance of capacities. The National Environmental Policy Act (NEPA 1969) provided the overarching planning framework for federal lands, ensuring that multiple uses and values are systematically addressed by developing alternatives and evaluating consequences. Several land management initiatives (e.g. Wilderness Act (1964), the Land and Water Conservation Fund Act (1964), the Wild and Scenic Rivers Act (1968), the National Trail System Act (1968), and the National Park and Recreation Area Act (1978) also address capacity or related issues). These initiatives encourage increases to the supply of wildland resources for recreation while recognizing the need to manage the type and amount of recreation use to protect experiences and resources.

Research has explored ecological and experiential impacts in these settings, showing that some impacts might occur even with low use levels. Deciding which conditions are desirable, how much impact is unacceptable, how use levels affect conditions, and how much use should be accommodated became the focus. Researchers recognized the importance of clear management goals and specific objectives for ecological, cultural, and experiential resources. Several research-developed planning frameworks specified terminology and steps that could be used to identify and manage impacts from recreation use. Although there are differences in these processes, they all recognize potential trade-offs between different use levels, conditions, and management actions while providing high-quality experiences (Whittaker et al. 2011).

User capacities are a common management tool used by local, state, and federal agencies (Brown 2001), and the topic has been the focus of several national conferences, recent review papers (Whittaker et al. 2011;

Graefe et al. 2011), and federal interagency task forces (Haas et al. 2002; Cahill et al. 2012). Many managers have established capacities or considered them in their planning, even if they did not employ all the steps or ideas in the research-developed planning frameworks. Capacities have been applied to protect natural, cultural, and experiential resources in diverse recreation settings (rivers, lakes, trails, backcountry areas, mountains, and islands, for example); to help define the appropriate size and type of facilities (campgrounds, marinas, boat launches, transportation systems, and visitor centers, for instance); to shape the size of agency programs (interpretation or maintenance, for example); and to determine appropriate levels of commercial and non-commercial uses. Several recent court rulings, including those for the Merced River Plan, have contributed to the evolution of capacity practices. In each case, rulings have set precedents, contributed capacity-related judicial doctrine, and helped clarify defensible and legally sufficient processes for capacity-related decision-making.

Defining Capacity for a Wild and Scenic River

WSRA Capacity Requirement and Definition

The Wild and Scenic Rivers Act requires that comprehensive management plans for designated rivers address user capacities, while the 1982 Secretarial Guidelines and court decisions interpreting the Act and the Guidelines offer additional definitional or procedural requirements when developing capacities. Without offering legal comment, excerpts about user capacity from these sources are provided below (in "long form" for completeness). The Merced River Plan has been developed to be consistent with WSRA and the Secretarial Guidelines, as interpreted by judicial opinions.

Wild and Scenic Rivers Act

Overall policy goal of the Act – Section 1(b and c): "It is hereby declared to be the policy of the United States that certain selected rivers of the Nation which, with their immediate environments, possess outstandingly remarkable scenic, recreational, geologic, fish and wildlife, historic, cultural, or other similar values, shall be preserved in free-flowing condition, and that they and their immediate environments shall be protected for the benefit and enjoyment of present and future generations. The Congress declares that the established national policy of dam and other construction at appropriate sections of the rivers of the United States needs to be complemented by a policy that would preserve other selected rivers or sections thereof in their free-flowing condition to protect the water quality of such rivers and to fulfill other vital national conservation purposes. The purpose of this Act is to implement this policy by instituting a national wild and scenic rivers system, by designating the initial components of that system, and by prescribing the methods by which and standards according to which additional components may be added to the system from time to time."

The requirement to address user capacities – Section 3(d) (1): "The federal agency charged with the administration of each component of the National Wild and Scenic Rivers System shall prepare a comprehensive management plan for such river segment to provide for the protection of the river values. The plan shall address resource protection, development of lands and facilities, user capacities, and other management practices necessary or desirable to achieve the purposes of this Act."

Administering use – Section 10 (a): "Each component of the national wild and scenic rivers system shall be administered in such manner as to protect and enhance the values which caused it to be included in said

system without, insofar as is consistent therewith, limiting other uses that do not substantially interfere with public use and enjoyment of these values. In such administration primary emphasis shall be given to protecting its esthetic, scenic, historic, archaeologic, and scientific features. Management plans for any such component may establish varying degrees of intensity for its protection and development, based on the special attributes of the area."

1982 Secretarial Guidelines

The Secretaries of the Departments of Interior and Agriculture jointly published *National Wild and Scenic Rivers System: Final Revised Guidelines for Eligibility, Classification and Management of River Areas* in the Federal Register September 7, 1982. These provided guidance on several designation and management topics that are directly or tangentially related to capacity. Relevant passages include:

Definition of capacity. "Carrying capacity: The quantity of recreation use which an area can sustain without adverse impact on the outstandingly remarkable values and free-flowing character of the river area, the quality of recreation experience, and public health and safety."

Existing versus future development. "Although each classification permits certain existing development, the criteria do not imply that additional inconsistent development is permitted in the future."

Exceptions for classifying river segments. "The classification guidance criteria provide uniform guidance for professional judgment, but they are not absolutes. It is not possible to formulate criteria so as to mechanically or automatically classify river areas. Therefore, there may occasionally be exceptions to some of the criteria."

Managing beyond corridor boundaries. "Management of the river area may be facilitated by extension to include established or available access points not included in the [designation] study."

Management plans. "Wild and Scenic rivers shall be managed with plans prepared in accordance with the requirements of the Act, other applicable laws, and the following general management principles. Management plans will state: General principles for any land acquisition which may be necessary; the kinds and amounts of public use which the river area can sustain without impact to the values for which it was designated; and specific management objectives for each of the various river segments and protect esthetic, scenic, historic, archeologic and scientific features."

Nondegradation standard. "Section 10(a)…is interpreted as stating a nondegradation and enhancement policy for all designated river areas, regardless of classification. Each component will be managed to protect and enhance the values for which the river was designated, while providing for public recreation and resource uses which do not adversely impact or degrade those values."

Management actions to protect and enhance values. "Specific management strategies will vary according to classification but will always be designed to protect and enhance the values of the river area. Land uses and developments on private lands within the river area which were in existence when the river was designated may be permitted to continue. New land uses must be evaluated for their compatibility with the purposes of the Act."

Carrying capacities in management plans. "Studies will be made during preparation of the management plan and periodically thereafter to determine the quantity and mixture of recreation and other public use which can be permitted without adverse impact on the resource values of the river area. Management of the river area can then be planned accordingly."

Public Use and Access. "Public use will be regulated and distributed where necessary to protect and enhance (by allowing natural recovery where resources have been damaged) the resource values of the river area. Public use may be controlled by limiting public access to the river, by issuing permits, or by other means available to the managing agency through its general statutory authorities."

Basic facilities. "The managing agency may provide basic facilities to absorb user impacts on the resource. Wild river areas will contain only the basic minimum facilities in keeping with the "essentially primitive" nature of the area. If facilities such as toilets and refuse containers are necessary, they will generally be located at access points or at a sufficient distance from the river bank to minimize their intrusive impact. In scenic and recreational river areas, simple comfort and convenience facilities such as toilets, shelters, fireplaces, picnic tables and refuse containers are appropriate. These, when placed within the river area, will be judiciously located to protect the values of popular areas from the impacts of public use."

Major facilities. "Major public use facilities such as developed campgrounds, major visitor centers and administrative headquarters will, where feasible, be located outside the river area. If such facilities are necessary to provide for public use and/or to protect the river resource, and location outside the river area is infeasible, such facilities may be located within the river area provided they do not have an adverse effect on the values for which the river area was designated."

Other Resource Management Practices. "Resource management practices will be limited to those which are necessary for protection, conservation, rehabilitation, or enhancement of the river area resources. Such features as trail bridges, fences, water bars and drainage ditches and other minor structures or management practices are permitted when compatible with the classification of the river area and provided that the area remains natural in appearance and the practices or structures harmonize with the surrounding environment."

Merced Litigation Rulings

Litigation related to the WSRA and NPS management in the Merced Corridor has offered additional guidance regarding the role of capacity in WSR management plans. The U.S. Court of Appeals for the Ninth Circuit (Friends of Yosemite Valley v. Kempthorne, 520 F.3d 1024, 9th Cir. 2008, known as Yosemite III) provides the summary interpretation of all the related Merced litigation, including references to earlier rulings (referred to as Yosemite I and II). Relevant passages include:

Summary of decision. "We hold that the 2005 Revised Plan does not describe an actual level of visitor use that will not adversely impact the Merced's Outstanding Remarkable Values ("ORVs") as required by Yosemite I and the WSRA because the Visitor Experience and Resource Protection ("VERP") framework is reactionary and requires a response only after degradation has already occurred. Moreover, the interim limits are based on current capacity limits and NPS has not shown that such limits protect and enhance the Merced's ORVs. And, as we made clear in Yosemite II, we again conclude that the WSRA requires that the CMP be in the form of a single, comprehensive document, which addresses all the required elements, including both the "kinds" and "amounts" of use, and thus the 2005 Revised Plan is deficient because it addressed only the two components struck down in Yosemite I and was not a single, self-contained plan. Finally, we conclude that the SEIS violates NEPA because the "no-action" alternative assumed the existence of the very plan being proposed; the three action alternatives—which are each primarily based on the VERP framework—are unreasonably narrow; and for the first five years, the interim limits proposed by the three alternatives are essentially identical."

ORVs justify designation and provide a benchmark. "The WSRA framework designates rivers based on specific "outstandingly remarkable values" ("ORVs") which both justify the initial designation of a river as a

WSRS component, and provide the benchmark for evaluating a proposed project affecting a designated river. While, under the WSRA, protecting and enhancing the designated ORVs is paramount, this goal may be compatible with other uses."

Interchangeability of carrying capacity versus user capacity. "Notably, the Secretarial Guidelines discuss "carrying capacity," a term that does not appear in the WSRA itself." "Congress added the current [language in Section 10(d)] to the WSRA in 1986…[t]hus the Secretarial Guidelines' use of "carrying capacity" predated the enactment of the WSRA's "address… user capacities" language."

Plain meaning of "address…user capacities." "Analyzing the plain meaning of the terms within the phrase "address . . . user capacities" as well the Secretarial Guidelines, we interpreted the requirement to "address . . . user capacities" to mean that the CMP must include "specific measurable limits on use." Id. at 797 (emphasis added). "[T]he plain meaning of the phrase 'address . . . user capacities,' is simply that the CMP must deal with or discuss the maximum number of people that can be received at a WSRS."

Problematic NPS capacity methods in 2000 plan. "We concluded, in Yosemite I, that NPS's method of addressing user capacities was problematic. 348 F.3d at 797. The 2000 CMP's primary method of addressing user capacities was through a framework called Visitor Experience and Resource Protection ("VERP"). Id. at 796. "

"We concluded that the VERP framework, as set out in the 2000 CMP, failed sufficiently to address user capacities because it did not adopt "quantitative measures sufficient to ensure its effectiveness as a current measure of user capacities." Id. Rather than establish specific indicators or standards to implement the VERP, the 2000 CMP provided "examples" of indicators and standards. Id. at 796. By only providing illustrative standards, "the [2000] CMP fail[ed] to yield any actual measure of user capacities, whether by setting limits on the specific number of visitors, by monitoring and maintaining environmental and experiential criteria under the VERP framework, or through some other method." Id. This "fail[ure] to provide any concrete measure of use," we found, was inconsistent with our interpretation of the phrase "address . . . user capacities." Id. at 797."

Problematic NPS capacity methods in 2005 revised plan. "The district court held that NPS failed to comply with our order that "[o]n remand, the NPS shall adopt specific limits on user capacity . . . [that] describe an actual level of visitor use that will not adversely impact the Merced's ORVs." Id. At 1098 (internal quotation marks omitted)." According to the district court, "some sixteen years after [NPS] was required to create a [CMP] for the Merced River, [it] decide[d] that for approximately five years, it would like to experiment with implementing the VERP program as its primary means of addressing user capacity." Id. NPS also failed to commit to the use of the VERP program for the long run, stating that "whether VERP will become permanent after five years is not known at this time." Id. (internal quotation marks omitted). Rather, "[w]hat NPS has created in the VERP portion of the user capacity program in the 2005 Revised Plan is a tentative plan of uncertain duration which adopts temporary limits, which will apply for an unknown length of time." Id. at 1100."

"Furthermore, despite providing for interim limits while NPS conducts field testing of the VERP indicators and standards, NPS's interim limits, which are set to apply for a period of 5 years, "are simply the current physical capacity of the facilities in Yosemite Valley." Id. The court also criticized VERP for being "reactive" in that it calls for management action only after environmental degradation has already occurred. Id. at 1100."

Importance of proactive indicators and standards to protect river values. "That an indicator may be able to provide an early warning, does not mean that it does in practice. A standard must be chosen that does in fact

trigger management action before degradation occurs. Also, that an early warning sign may call for the implementation of proactive management does not provide much assurance that such implementation will occur."

"The VERP system remains problematic even if VERP does not rely on examples instead of actual indicators and standards. Currently, VERP requires management action only when degradation has already occurred, and it is therefore legally deficient."

Addressing existing facilities and potential degradation. "There is no authority for a presumption that holding facility levels to those in existence in 1987, when the Merced was designated under the WSRA, is protective of ORVs or satisfies the user capacity component of the required CMP. See Friends of Yosemite, 439 F. Supp. 2d at 1099-1100. NPS has a responsibility under the "protect and enhance" requirement of the WSRA to address both past and ongoing degradation. Setting interim limits to current capacity limits does not address the problem of past degradation. Moreover, nowhere has NPS shown how its interim limits place "primary emphasis" on the protection of the Merced River's "esthetic, scenic, historic, archeologic, and scientific features" as required by § 1281(a). And although the WSRA does not preclude basing user capacity limits on current capacity limits, NPS's decision to base many of its interim limits on current capacity limits was not "founded on a reasoned evaluation of the relevant factors." See Yosemite I, 348 F.3d at 793 (internal quotation marks omitted). Nor has NPS "articulated a rational connection between the facts found and the choice made." See id."

Illustration of degradation in the Merced Corridor ("Footnote 5"). "To illustrate the level of degradation already experienced in the Merced and maintained under the regime of interim limits proposed by NPS, we need look no further than the dozens of facilities and services operating within the river corridor, including but not limited to, the many swimming pools, tennis courts, mountain sports shops, restaurants, cafeterias, bars, snack stands and other food and beverage services, gift shops, general merchandise stores, an ice-skating rink, an amphitheater, a specialty gift shop, a camp store, an art activity center, rental facilities for bicycles and rafts, skis and other equipment, a golf course and a dining hall accommodating 70 people. Although recreation is an ORV that must be protected and enhanced, see 16 U.S.C. § 1271, to be included as an ORV, according to NPS itself, a value must be (1) river-related or river dependent, and (2) rare, unique, or exemplary in a regional or national context. The multitude of facilities and services provided at the Merced certainly do not meet the mandatory criteria for inclusion as an ORV. NPS does not explain how maintaining such a status quo in the interim would protect or enhance the river's unique values as required under the WRSA."

Developing Capacities in the MRP

The capacity definitions referenced in the Act, Guidelines, and court rulings are compatible with definitions found in the scientific literature (Whittaker et al, 2011). That literature suggests that capacities have three components: units of use, location, and timing.

Units of Use

Capacities define the type and amount of use, which can be expressed in different units. Some areas focus on people, while others focus on groups or other units (boats, vehicles, etc.) that are highly correlated with people or groups. In the Merced River Plan, user capacities are organized into three major categories:

overnight use, day use, and administrative use. Capacities are developed in each category for each river segment.

Overnight use: This category includes people who stay overnight in a campsite in the Merced River corridor, in one of the Yosemite lodges, at the Merced Lake High Sierra Camp, or who backpack in Yosemite's Wilderness. Overnight use capacities define the number of corridor camping units, lodging units, or people allowed in Wilderness zones per night for a given alternative. These "units per night" capacities are also translated into "people per night" capacities assuming full occupancy and "visitation estimates" assuming average expected occupancy (see discussion on "Capacities and Visitation Estimates" below).

Day use: This category includes people who come for all or part of a day to sightsee, hike, or pursue other activities, spending the night outside the river corridor. Considerable day use is concentrated in Yosemite Valley and Wawona, although day users also visit Wilderness segments that can be reached on a day hike from Yosemite Valley or Wawona. The day-use category also includes people passing through Yosemite on Highway 140 or using roadside pull-outs in El Portal and the Merced Gorge. Day-use capacities define the number of people in the corridor at one time (PAOT) for a given alternative. These AOT capacities are also translated into "people per day" visitation estimates using assumptions about vehicle/bus occupancy and turnover rates at parking areas (see discussion on "Capacities and Visitation Estimates" below).

Although summing day and overnight use is possible (and has been done for some purposes in Chapter 6), the combined total should be considered an "aggregation." Overnight users spend parts of two days in the area and have different impacts from day users, who enter and leave the park on a single date.

Administrative use: This category includes NPS, park concessioner, park partner, and volunteer personnel. Specific examples include trail crews, maintenance workers, resource protection staff, scientific research teams, campground staff, and concessioner employees at the lodges, restaurants, and stores. Administrative use capacities define the number of administrative people per day in a corridor segment, with further distinctions between day (people who commute into a segment) and overnight (resident) use.

Although summing administrative and visitor use is possible, visitor use receives greater attention in the MRP because it determines the amount of public access, is much larger than administrative use and creates greater impacts, and it is a primary element for assessing socioeconomic consequences.

Location

User capacities are location-specific and defined for river segments (and, in some cases, for areas within segments, such as boating reaches). Merced Corridor areas with higher concentrations of use include:

> The Merced River upstream of Nevada Fall, specifically the more concentrated backcountry and overnight use found near the Merced Lake High Sierra Camp.
>
> Yosemite Valley, the most developed and highest use area in the corridor, which has implications for use in other segments. In some cases, capacities are discussed separately for the higher development East Valley (a WSRA recreational segment) and lower development West Valley (a WSRA scenic segment).
>
> Wawona, a small community with a concentration of use and development.
>
> El Portal, an NPS administrative site and community with residential facilities, privately-operated hotels, and other services that affect use in the Valley and elsewhere in the corridor.

Timing

The timing for capacities in the MRP is generally expressed as a number of people "per day" or "per night" as described above. However, user capacities were often developed from analyses that focus on the number of people "at one time" (AOT). This recognizes that peak use conditions for lodging, camping, roads, parking areas, viewing areas, or beaches are particularly important, and are different from the total number of people visiting over the entire day. These AOT capacities ensure acceptable conditions during peak use times; by extension, they also provide lower-density conditions during other times (e.g., early or late in the day, mid-week, or during the off season). When relevant, the Plan provides summary information about "per day capacities" as well as the "AOT capacities" from which they were derived. The assumptions used to "translate" between these different capacities are discussed below.

User Capacities and Visitation Estimates

User capacities in the MRP identify the maximum number of people that can be received in different alternatives. These capacities are based on how much use can occur at one time without causing ORV-related conditions to reach unacceptable levels defined by standards, and they consider the combined effects of day, overnight, and administrative use.

These capacities are developed for a specific unit of use, time, and location, but it is often important to "translate" them into other metrics or for larger areas or time periods. In a complex system like the Merced Corridor or Yosemite Valley, NPS may not be able to effectively manage people "at one time" at a particular site (e.g., people visiting an attraction like Vernal Falls). In such cases, realistic use management generally occurs at a larger scale (e.g., vehicles per day entering East Valley). Similarly, park managers, the park concessioner, and gateway communities are interested in aggregating use allowed by capacities into daily, seasonal, or annual totals because these metrics may affect local employment, business revenues, and other park programming.

In order to provide these types of use information, assumptions and logical calculations were used to translate capacities into other use metrics. ***Example translations include:***

> Capacities for campsites and lodging units assume full occupancy, but use data show that these units historically average fewer people in those sites or rooms per night. Overnight capacities for campgrounds, for example, are based on X sites times a maximum of Y people (usually six) per site. But the plan also calculates realistic "visitation estimates" that assume X sites times the long term average number of people per site (usually about four). This overnight visitation estimate is the use level that is expected to occur under a given alternative.
>
> Capacities for day use at one time are based on assumptions about people per vehicle (the long term average at Yosemite is 2.9), maximum efficient parking occupancy levels (90% full), and the number of vehicles that can be circulating on roads without causing traffic circulation problems (see additional discussion about transportation below). These capacities can be translated into daily day use visitation estimates by considering parking turnover rates developed from transportation modeling. The day use visitation estimate is the use level that is expected to occur under a given alternative.
>
> Capacities at one time for individual sites such as Bridalveil Fall, Yosemite Falls, Vernal Falls, or riverside beaches can be translated into visitation estimates (people per day) at those sites based on assumptions about use patterns through a typical day (developed from research). Per day estimates, in turn, have been correlated with at-one-time and daily day use levels (vehicles past a counter) to allow translations between site use levels and larger area use levels.

Visitation estimates are the expected daily use levels derived from specific capacities in an alternative, and they are kept low enough to avoid unacceptable conditions. These estimates can also be "rolled together" to understand how different capacity decisions result in different daily, seasonal, or annual visitation levels.

PART II: PROCESS TO ADDRESS USER CAPACITY

This part of the appendix provides an overview and explanation of the capacity decision process in the MRP, and a "road map" for places where readers can find specific capacity-related information in the plan.

Capacities in the Overall Planning Process

User capacities were developed through a process that was integrated into overall planning. The MRP alternatives are comprehensive management prescriptions that include a combination of restoration, facility, protection, and capacity decisions as recommended in the capacity literature (Haas 2003; Whittaker et al. 2010). Capacities were not an independent "overlay," but an integral part of developing alternatives. ***While this process is listed serially, the nature of planning is iterative. Throughout the process, planners reconsidered analyses and made adjustments to ensure the plan evaluated a reasonable range of alternatives and capacities.***

Define river values. River values (including free-flowing condition, water quality, and outstandingly remarkable values) were the starting point for developing alternatives and associated capacities. ORVs identified the most important resource and recreation experience conditions using guidance in the Secretarial Guidelines. The ORVs were based on information about historical use, descriptions and management attention over the park's history, recommendations from subject matter experts, and public input. Draft ORVs were reported to the public in Summer 2010 and have been refined in Chapter 5 of the DEIS and FEIS.

Document conditions. For each ORV, NPS documented existing use and conditions based on a comprehensive review of existing research and monitoring. Additional analysis summarized baseline conditions at time of designation and potential future trends. For some conditions where there were information gaps, additional research or analyses were conducted. This included developing information about infrastructure and restoration actions that work with and constrain capacity choices. Information included summaries of ORV conditions and maps of physical site constraints, wetlands, flood plains, archeological sites, rare plants, water quantity / quality, and other special resources. A *River Values Baseline Conditions Report* was published as a draft in April 2011 and updated in July 2012. This formed the basis for the affected environment chapter in the DEIS and FEIS.

Analyze types and amounts of use. Recreation is the most substantial public use that occurs in the river corridor. This analysis considered existing and potential recreation uses, conditions or management issues affected by that use, visitor survey information about preferences for different activities, and public comments. Sources included public input during scoping (NPS 2011v), general visitor surveys (Littlejohn et al. 2005; Le et al. 2008; Blotkamp et al. 2010), site-specific capacity studies (Manning et al., 1998; Lawson et al., 2007; Whittaker and Shelby, 2011), and summaries of information about historic, current, and projected levels of visitor use with different infrastructure assumptions (DEA 2007; NPS 2008d; NPS 2008e; NPS 2009c; and NPS 2009e).

Develop alternative concepts. Potential management actions were packaged around themes to develop a reasonable range of preliminary alternatives, as required by NEPA. As shown in "Alternatives" (Chapter 8), management actions include restoration, infrastructure changes (e.g., roads, parking, boardwalks, fences, or trails), and education/regulation programs that affect user capacities that protect and enhance river values. Several principles guided this effort: 1) capacities should vary across a reasonable range of alternatives (as

required by NEPA); but 2) all must protect ORVs; 3) some restoration actions, new developments, or infrastructure changes would be common to all alternatives, while others could vary; and 4) compatible management actions would be combined to create meaningful distinctions between alternatives. Additional details about the "four analyses" involved in alternative development are discussed below.

Develop indicators and standards. This step identified quantifiable measures of desired conditions for all river values. Indicators are variables that represent important resource or experiential conditions; standards define the line between "acceptable" and "unacceptable" conditions (see Chapter 5). Indicators related to use were important for capacities; indicators not related to use are important, but they protect/enhance values through management actions other than limiting the amount of use. Information sources included existing research and monitoring, with additional input from subject matter experts.

Analyze use-impact relationships. With indicators and standards developed, analyses shifted to relationships between use and ORV conditions. Analyses applied the best available scientific information and included predictive modeling for social and transportation conditions. This analysis integrates decisions about restoration and infrastructure actions, which have profound influences on how use affects river values.

Define alternatives and user capacities. This refined the alternative concepts developed earlier. Each alternative integrated a comprehensive suite of management actions, including restoration, facilities/transportation infrastructure, indicators and standards, and capacities. The step included "limiting factor analysis." Capacities involve commitments to meet all standards, so the standard that would be violated at the lowest use level defines the capacity and becomes the limiting factor. If other management actions can be employed to modify the use-condition relationship and allow that standard to be met at higher use, a different standard may become the limiting factor.

Monitor and apply adaptive management. Future monitoring will assess whether use and conditions remain at predicted levels. If conditions approach standards, management actions will be taken to protect river values. This step recognizes predictions made during planning may change, new uses or impacts may arise, or unanticipated consequences may produce unacceptable impacts to river values. The Secretarial Guidelines encourage monitoring and adaptive management, as does the visitor-use management literature (see Cole 1990; Cole and Stankey 1997; Marion 1998; Hammit and Cole 1998; Cole et al. 2005, Manning 2007, McCool et al. 2007; Manning, 2011; Whittaker et al. 2011). If monitoring shows problems, the plan may need to be revisited. Major changes in capacities, standards, or actions require appropriate public input and compliance with NEPA amendment processes.

Four Analyses

Four analyses informed the capacity process described above. Illustrative findings from each are provided in Part IV of this appendix.

- **Ecological and restoration analyses** identified natural resources that were candidates for preservation or restoration to protect or enhance river values. These affect development and infrastructure options, which in turn affect capacities.
- **Facilities and services analyses** reviewed existing infrastructure and evaluated what should retained, redesigned, relocated, or removed to protect/enhance river values or address health and safety issues. Facilities affect the amount of use an area can accommodate.
- **Social conditions analyses** assessed how use levels affect different experiences at attraction sites or river use areas.

- **Transportation analyses** assessed how existing or potential new circulation and parking infrastructure would affect traffic conditions. All alternatives depend on a functional transportation system that efficiently distributes use to the attractions people want to visit.

Ecological and Restoration Analyses

A review of ecological values and existing conditions identified riparian areas and meadows needing restoration because of unacceptable impacts (see Actions Common to Alternatives 2-6 in Chapter 8). Action alternatives included additional restoration options that would further enhance biologic or hydrologic/geologic values in specific areas (see individual alternatives in Chapter 8). In all cases, restoration actions affected capacity decisions because they constrained areas where development could occur, which had substantial effects on circulation options, parking infrastructure, or the amount of camping and lodging that could be provided. Restoration plans also helped identify infrastructure (e.g., boardwalks and fencing) needed to protect sensitive areas.

Facilities and Services Analyses

The Wild and Scenic Rivers Act, 1982 Guidelines, and the Ninth Circuit's 2008 opinion provided guidance about the types and amounts of facilities suitable in designated river corridors. NPS determined the kinds of development that would ***not*** be considered in any alternatives (e.g., major expansion of roads or multi-story parking) as described in "Actions Considered but Dismissed" (see Chapter 8). NPS also conducted an extensive analysis of existing facilities and services to determine what should be retained, redesigned, relocated, or removed (see Chapter 7: Facility and Services Analysis). These decisions constrained the amount of development available for camping, lodging, circulation, parking, or residential and service infrastructure. Facilities and services that must be removed, relocated, or redesigned are identified in "Actions Common to All Alternatives." Action alternatives (see Chapter 8) vary other facilities and development to provide a reasonable range, and these choices affect capacities.

Transportation Analyses

Efficient transportation systems are an important component of high-quality recreation in the Merced River corridor, particularly in Yosemite Valley. The transportation system, including roads, parking, and transit, is the primary means of access to the river corridor for most visitors, and crowding, congestion, or delays directly affect an individual's ability to recreate. Early in the planning process, NPS recognized that the sheer volume of vehicles and people in the Valley on high use days strained the existing transportation system, producing traffic jams at intersections and full parking lots. These problems have been challenging the park's infrastructure and operational staff for decades, but more frequently in recent years (DEA, 2012).

Transportation analyses were conducted prior to and concurrent with alternative development for the DEIS (DEA 2012), These analyses showed that in the existing transportation system, congestion can be caused by constricted roadways (particularly the two-way segment from Yosemite Lodge to Yosemite Village), by vehicles clogging roads or parking areas in search of parking spaces, and by intersections or pedestrian crossings that cannot handle the volume of use. As these bottlenecks exceed their design capacity, conditions such as travel times, queue lengths, and vehicles per road viewscape may "go exponential" (increase at increasing rates). User capacities and transportation choices in each MRP alternative were developed in tandem to address these problems. In all alternatives, capacities and transportation

infrastructure were designed to "fit" together to avoid unacceptable traffic congestion under normal conditions. Transportation modeling was integral during this process.

Transportation modeling assessed how levels of vehicle use (associated with levels and locations of overnight and day-use parking) would affect traffic circulation (DEA 2012). This was done for each alternative, given infrastructure choices (such as the amount of roadside parking, added lot parking, intersection improvements, and the number of pedestrian underpasses) and assumptions about the number of visitors who enter the Valley via tour buses and regional transit. These models assessed the number of vehicles the transportation system can handle, and rated transportation system performance with a focus on two indicators: day-use parking availability and travel times on road segments (DEA 2012). Models show how more parking, intersection improvements, and pedestrian underpasses are needed to handle the higher use levels that would be allowed in Alternatives 5 and 6 compared to lower use Alternatives 2-4.

Social Condition Analyses

Yosemite has a wealth of research exploring how use affects social conditions at attraction sites or areas along the river. These studies include visitor surveys, computer simulation modeling, and resource impact studies. Collectively, this research helped describe the plan's two recreational river values (presented in Chapter 5), and showed how use levels affect the quality of experiences in the Merced River corridor (see www.nps.gov/yose/parkmgmt/mrp.htm for more information about the social science research program).

Social condition analyses focused on defining important recreation opportunities and their attributes, developing indicators and standards of quality for those opportunities, and developing relationships between use and those indicators. In the Wilderness or backcountry areas of the Merced corridor, the focus was on trail or river encounters. In Yosemite Valley, the focus was on use densities at specific attraction sites such as Yosemite Falls, Vernal Falls, Bridalveil Fall, shoreline beaches, and boating segments in East Valley. Research and subsequent modeling also describe relationships between densities at specific sites and use levels for larger areas (e.g., East Valley), helping develop capacities that protect social conditions in the area.

Road Map to User Capacity Information in the MRP

User capacity and visitor management information is provided throughout this Merced River Final Plan/EIS. The following is a "road map" to user capacity topics or related information contained in the various plan chapters.

CHAPTER 1: ***Planning goals*** for the MRP have been summarized in Chapter 1. These include capacity and visitor management goals from the 1980 *General Management Plan* for Yosemite National Park (GMP) and those developed specifically for the MRP. They provide overall direction to protect resource values, provide high-quality visitor experiences, and address crowding and traffic impacts through a visitor management program.

CHAPTER 2: The ***need for addressing user capacity*** and background on Merced planning litigation is summarized in "Purpose and Need for the 'Merced River Plan'" *(Chapter 2)*. Chapter 2 also includes a summary of public involvement, including a description of ***public workshops focused on user capacity***.

CHAPTER 3: The Merced River Final Plan/EIS ***river segments*** are defined in "Merced River Boundaries and Segment Classifications" (Chapter 3). These define the locations where capacities apply. River

classifications help inform the kinds and amounts of use and the support facilities appropriate for various river segments.

CHAPTER 4: The ***Section 7 determination process*** guides decisions in "Section 7 of the Wild and Scenic Rivers Act – Determination Process for Water Resources Projects" (Chapter 4) pertaining to development within the bed and banks of the river.

CHAPTER 5: ***River values*** are defined in "River Values and Their Management" (Chapter 5) that summarizes the process to protect and enhance the river's values, and then defines the river's free-flowing condition, water quality, and segment-specific "outstandingly remarkable values." For each value, the chapter summarizes ***baseline conditions now and at the time of designation,*** describes the range of ***management indicators and standards that were considered in the alternatives,*** and identifies management responses to conditions that threaten to violate management standards.

CHAPTER 6: Summarizes the capacity process and user capacities by segment, but in a more concise format than this appendix.

CHAPTER 7: Contains the ***facilities and services analysis*** that helped inform decisions in the plan regarding the appropriate types and levels of infrastructure and related visitor services.

CHAPTER 8: Contains a ***description of current management*** or the "no action alternative," which includes existing user capacities (for overnight accommodations, campgrounds, and backcountry use, for example). Management ***actions to protect and enhance river values that are "common to all" alternatives*** are also described, including restoration and infrastructure decisions that affect capacities (e.g., overnight accommodation facilities, space available for parking, or transportation infrastructure development).. ***Individual alternative descriptions*** are provided, too. These include information about specific user capacities by river segment for overnight, day, and administrative uses throughout the corridor, and associated management actions that would protect and enhance river values.

CHAPTER 9: ***The environmental consequences of the alternatives*** (which include user capacities) are provided in Volume II of the FEIS. These NEPA-based assessments are largely qualitative descriptions of environmental effects but include some ***quantitative analyses based on capacity decisions*** (local economic impacts, meadow or riparian conditions, and peak season densities at recreation sites, for example).

PART III: FREQUENTLY ASKED QUESTIONS ABOUT CAPACITY IN THE MRP

The following questions and answers address important user-capacity issues raised throughout the MRP process by NPS staff, stakeholders, and the public. The purpose of this section is to discuss and document ideas that drive user-capacity decisions in the MRP. Readers are forewarned that a few FAQs overlap, but some redundancy is better than not fully answering each question. For quick reference, questions are numbered, organized by topic areas, and listed below:

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Capacities, River Values, and Tradeoffs

1. Is user capacity intrinsic to an area and determined only by resource characteristics?

No. User capacities are an outcome of a decision-making process and part of a larger management program. Capacities are derived from a series of judgments in the plan about river values, desired future environmental and experiential conditions, and the acceptability of facilities and transportation infrastructure designed to handle use.

2. Do user capacities involve value judgments?

Yes. Several parts of the user-capacity process involve decisions that include value judgments. While scientific inquiry can tell us a lot about the consequences of different choices, research cannot tell us what the "right" choices are. Research-informed judgments start at a general level when river values are defined. Other decisions feed into the management objectives for the types of visitor experiences to be provided, and the development of acceptable standards for river value conditions. Judgments are also involved in the combination of management actions included in each alternative.

3. What are the tradeoffs involved between alternatives with higher vs. lower user capacities?

User capacities, resource conditions, and the infrastructure to support visitation are foundational elements in each alternative. Changing one component often has implications for the others. User capacities in different alternatives show how higher and lower amounts of use fit with infrastructure and other management actions to produce different resource conditions and to protect river values in different ways. These represent choices for the types of experiences the Merced River offers now and in the future (as required by NEPA), which must protect river values (as required by WSRA).

4. What are the limiting factors to user capacity?

The "amount" of use an area can sustain depends on its resource characteristics, the type and quantity of use anticipated, and the effectiveness of management actions. Ultimately, the factors that determine how much use is "too much" depend on the conditions being managed for and the type of use being considered. This will vary across the eight Merced River segments, each representing a different type of river area providing different opportunities for use.

5. *Is one type of capacity a "lowest common denominator" that "takes care of" other capacities?*

Capacity determinations in the Merced Corridor usually consider biological, facility, transportation, and social impacts and their relationships with use levels. Whichever use-related impact would limit use at the lowest level becomes the "limiting factor," and that capacity also would ensure other conditions remain at acceptable levels. Because other management actions can affect use-impact relationships, limiting factor analysis requires knowledge of all actions to be included in a particular management prescription.

6. *How do biological values relate to user capacities?*

Biological conditions can be sensitive to an amount of use, in which case they may be a limiting factor in determining capacity. Most often, though, biological conditions are related to the *type of use* and *how it is managed* rather than the amount of use. For example, a trail crossing a sensitive wet meadow could be vulnerable to widening by hikers avoiding puddles by walking to the side of the trail. In this situation, the behavior or type of use is the problem, not the number of users. Such a problem could be remedied through trail construction, such as building a trail that drains better or has boardwalks over frequently wet areas. Once such a trail exists, impacts to biological conditions are not the limiting factor for capacity, so the focus shifts to conditions that are more strongly related to numbers of users, such as social conditions.

7. *How do cultural values relate to user capacities?*

As with biological values, cultural values can be sensitive to an amount of use and be a limiting factor for capacity. However, cultural values are also more often affected by the type rather than quantity of use. Cultural resources are particularly sensitive to depreciative behavior by a small minority of users (e.g., graffiti, vandalism, theft of artifacts by souvenir seekers), which are more effectively addressed through regulations and enforcement. This is not a capacity issue. Even if trail erosion in an artifact area uncovers or moves cultural resources, the most effective fix is a re-designed trail that prevents erosion or avoids the sensitive area.

Like biological resources, cultural resources may constrain new development. For example, new intersections or pedestrian underpasses may require cultural resource assessments and/or mitigation to ensure that these "capacity solutions" do not degrade other valuable resources. The pedestrian underpass proposed in the preferred alternative between the Lodge and Yosemite Falls trail will consider such issues in the site design and tiered compliance process.

8. *Is there a theoretical maximum capacity based on biological or cultural values?*

Theoretically there is a maximum capacity based on biological or cultural values, but it is probably quite high. As discussed above, these impacts can often be mitigated by managing types of use or developing infrastructure that helps withstand or accommodate use. For example, several impacts would be decreased if everyone came into the Valley on buses, parked in multi-story structures, had to stay on paved trails, and spent the night in high rise hotels.

But people often resist such changes in a place like Yosemite, objecting to mandatory mass transit, extensive boardwalks, wider roads, higher buildings, more intrusive rules and regulations, or even the financial costs of extensive mitigation. These objections are social judgments about acceptable conditions or costs, and they tend to limit capacities at lower levels than a theoretical biological maximum. In developing the MRP, NPS made some judgments about reasonable "sideboards" for restoration, facilities, transportation infrastructure, etc.

9. Is user capacity a single number developed from equations or calculations?

No. There are many user capacities in the plan for different areas, and they are not derived solely from equations or calculations. The alternatives show how different use levels would produce different conditions for visitors, along with varying levels of restoration (in riparian areas or meadows) and infrastructure (e.g., lodging, campgrounds, roads, intersections, boardwalks, etc.). However, the capacities for different areas considered equations and calculations that assess how use is related to different conditions based on research or modeling. Part IV of this appendix (starting on page S-33) provides some illustrative examples of findings from these analyses.

10. Does the MRP consider how user capacities will affect park uses outside the river corridor?

Yes. River values protected under WSRA are limited to the river corridor and must be river-related or dependent and regionally or nationally significant. However, NPS has considered how use levels affect other attractions and uses in the park (outside the corridor or not specifically identified as river values). For example, transportation system modeling examined the effect of different parking capacities on traffic conditions both inside and outside the river corridor. The interconnectedness of user capacity and transportation is particularly important in Yosemite National Park. High-quality recreation and enjoyment of the Merced River depends on an efficient transportation system that minimizes congestion and time spent traveling on roads, looking for parking, or waiting for shuttles or regional transit.

11. How was health and safety considered when developing capacities?

As specified in the 1982 Secretarial Guidelines, health and safety are important considerations in capacity decision-making, and provide "floor" conditions in all alternatives. For example, all alternatives needed an adequate circulation system that could be used for orderly evacuations in response to floods or winter storms. These concerns were integrated into transportation planning, and acted as constraints on use levels given specific transportation infrastructure choices. Similarly, public health and safety constrained development in areas with rockfall or flood hazards. Finally, all alternatives included health and safety infrastructure (e.g. sewer and related utility systems) that function for the volume of visitation and avoid polluting the river.

Defining a "Reasonable Range" of Capacities

12. Why does the MRP present different user capacities by alternative? Do all the user capacities protect river values?

The National Environmental Policy Act (NEPA) requires environmental impact statements to consider a reasonable range of alternatives. All MRP alternatives protect river values. Alternatives produce different conditions by combining different user capacities, infrastructure, and related programs of management actions. All protect and enhance river values (as required by WSRA), but in different ways. Higher use alternatives have higher levels of infrastructure and more intensive management to handle the use without unacceptable impacts, while providing opportunities for more visitors. Lower use alternatives require less infrastructure and management, and offer more opportunities for restoration, but provide opportunities for fewer visitors.

13. How did NPS define a "reasonable range" of user capacities to consider?

Alternative development can seem overwhelming if infrastructure and capacity choices are unbounded. But there are always historical, physical, legal, administrative, budgetary, and political constraints during decision-making. Yosemite has been a popular National Park with extensive visitation for over a century, with a considerable development footprint that includes historical properties (e.g., the Ahwahnee, Curry Camp/Village) and road access to several iconic attractions (e.g., Yosemite Falls, Bridalveil Fall). NPS was required to review these variables and make initial decisions about what is "on the table" and within a "reasonable range" of alternatives versus "actions considered but dismissed" (Chapter 8) and "issues beyond the scope and direction of the plan" (Chapter 2).

On the low end of use and development, NPS decided not to eliminate private vehicle use in East Valley or remove most overnight accommodation in the Valley (lodges and camping). Similarly, NPS decided not to consider reducing Yosemite Valley use to less than half of current use levels (e.g., similar use levels in the 1960s). However, NPS did consider sizable reductions in use, substantial changes to road circulation and parking to minimize congestion in the Valley, and reductions of some overnight lodging and associated development.

On the high end of use and development, NPS decided not to consider large scale road circulation or parking improvements (e.g., cloverleaf interchanges, multi-story parking garages), and adding overnight lodging (although NPS did consider alternatives that add camping in response to widespread public and stakeholder interest). Similarly, NPS recognized the need to consider alternatives at or slightly higher than current use levels. There is considerable demand for current use, and NPS recognized opportunities to better manage use, restore damaged areas, and accommodate existing use levels while still protecting river values.

14. Did NPS consider higher use alternatives than Alternative 6?

Yes, in early "brainstorming" stages of alternative development, higher use scenarios were considered but shown to have major transportation challenges. In order to preserve reasonable- quality transportation conditions, such scenarios would have required elements such as additional lanes to Valley roads, more than three roundabouts and two pedestrian underpasses at Valley intersections, and new large-scale parking in West Valley. These higher use scenarios also compromised restoration initiatives, and probably would have required additional capacity management at the attraction site scale (e.g., limiting the number of people that can visit places such as Yosemite Falls and Bridalveil Fall at one time) in order to provide acceptable social conditions. Initial review of these scenarios showed that higher use would require development or management that was expensive, politically unrealistic, and violated Park values or the spirit of the 2009 settlement agreement.

15. What is the highest use level NPS was willing to consider?

During early "brainstorming" stages of alternative development, a higher use scenario was considered that would have resulted in daily visitation levels of about 25,000 people. This number was calculated from transportation modeling that included three roundabouts and parking for 1,000 vehicles in the West Valley. Aside from extensive transportation infrastructure development, this level of visitation would have compromised restoration initiatives, might have produced unacceptable densities at iconic attraction sites such as Yosemite Falls and Bridalveil Fall, and pushed the limits of facilities in the East Valley (along with a

cascading need for employee housing and parking). This scenario helped define the upper end of the "range of reasonable alternatives" developed for the MRP (all were lower).

16. What conditions become unacceptable at higher use levels, and do these become the "limiting factors" for capacity?

For a given set of infrastructure and development, some conditions may become unacceptable at higher use levels. Capacities are designed to prevent them. In Yosemite Valley, transportation conditions and social conditions at attraction sites are generally most sensitive to use and thus became the limiting factors.

In order to allow higher use, one could eliminate transportation conditions as the limiting factor, but this would require actions such as wider roads (especially a third lane between Yosemite Lodge and Yosemite Village), higher capacity intersections (e.g., roundabouts), pedestrian underpasses, and more acreage dedicated to parking. Some of these developments would create unacceptable conditions for biological, cultural, and social values.

In order to allow higher use, one could also manage use at a few individual attraction sites to remove social conditions as a limiting factor. Versions of this approach are applied for Mariposa Grove (where parking is closed when the lot is full), and for Half Dome (where use is limited by permits to address safety and social conditions on the cables). However, site-specific permitting for Yosemite Valley attractions such as Yosemite Falls or Bridalveil Fall was considered undesirable due to the social imposition on visitors and the operational burden on staff.

Alternative 6 identifies the highest level of transportation infrastructure and highest densities at attraction sites that NPS was willing to consider. All alternatives include a substantial site redesign at Bridalveil Fall to accommodate more use while keeping site densities at acceptable levels (see discussion in Part IV for more details).

17. How do user capacities prevent gridlock in Yosemite Valley?

User capacities and transportation choices in each alternative have been developed in tandem to avoid excessive traffic congestion under normal conditions ("wildlife jams" and traffic accidents can create problems under any capacity). In some cases congestion is a function parking shortfalls (vehicles clogging the roads in search of spaces), but in others it is caused by intersections or on-grade pedestrian crossings that cannot handle the volume of use. As these bottlenecks approach and exceed their design capacity, conditions such as travel times, queue lengths, and vehicles per road viewscape "go exponential" (increase at a dramatically increasing rate). Anecdotal accounts of traffic gridlock from 2011 suggest modeling may underestimate travel times, queue lengths, and other transportation conditions, so it was important to be conservative in choosing capacities to avoid reaching a "tipping point." Transportation modeling helped define the appropriate level of parking and circulation to handle the estimated visitation for an alternative. Additional discussion of transportation system performance is provided in Part IV.

Implementing Capacities

18. If demand exceeds capacities, how will access to Yosemite Valley be allocated?

When demand exceeds supply defined by capacities, allocation systems decide who gets access. Overnight demand in the corridor commonly exceeds existing capacities during summer, and the use has long been allocated through campsite and lodging reservation systems, which also include a pricing component. Alternatives in the MRP continue to allocate overnight use in this fashion, with different distributions of types (e.g., some alternatives have more walk-in camping, or more lodging of one type vs. another). Options for implementing day use capacities are more complex. The two primary mechanisms included in the CMP/EIS are:

- An onsite "Traffic Diversion System" that prevents more cars from entering East Yosemite Valley than the alternative's road circulation and day use parking system can handle (its capacity). A version of this system is already in current use on busy days, and an improved form is proposed in the preferred alternative. It works well as long as demand exceeds supply for only a few hours on a minority of days. This system would continue under all alternatives in the Final Merced River Plan/EIS.
- A "Day-use Reservation System" that limits the number of day use parking permits (consistent with the capacity for the alternative). These reservations could be made in different ways (e.g., in advance versus day of arrival, at different locations, and/or with differential pricing). The details of such a system would be developed with tiered compliance and public review before implementation. This mechanism is proposed in lower use Alternatives 2, 3, and 4 because existing demand would often exceed supply defined by the capacities in those alternatives, and an on-site Traffic Diversion System would probably be overwhelmed. A Day-use Reservation System could be considered after implementation of Alternatives 5 or 6. If demand continues to increase relative to the capacity, the onsite Traffic Diversion System might create traffic problems at the site, especially if information about the diversion fails to discourage visitors from coming even when the Valley is "full."

19. Why are "vehicles at one time" (VAOT) important, and does this imply capacities are only about traffic management?

Vehicles at one time (VAOT) is an important use measure for Yosemite Valley because it indicates the number of visitors actively using the area during peak times – not just those using roads or parking, but also those visiting attraction sites, hiking trails, boating, relaxing on beaches, or using shopping and dining facilities. These peak use periods produce many of the unacceptable traffic and social conditions that detract from visitor experiences.

Capacities were developed for a given set of traffic and parking infrastructure in each alternative, but they go beyond managing traffic. They also protect biological resources, cultural resources, and social conditions at attraction sites, beaches, and on trails. An efficient transportation system also allows visitors to distribute themselves spatially and temporally, which helps minimize pulses of use at attractions or other high use areas.

20. Will the park manage day use by limiting vehicles?

Possibly. Beyond being a good indicator of use and related impacts, VAOT is an efficient tool for managing day use in Yosemite Valley, which builds to an early afternoon peak each day. Overnight use is already managed by the number of camping sites and lodging units available through reservation systems, but day

use has no such restraints. Because 84% of current day use arrives by private vehicle (Blotcamp, et al., 2009), and there are stable estimates of the number of people per vehicle, managing VAOT is an efficient tool for managing the largest slice of day use. Managing the number and schedule of day use tour buses and transit buses are additional options that are available, if needed.

For the low use alternatives (2, 3, and 4), day-use demand already exceeds capacities and would require a day use reservation system. For higher use alternatives (5 and 6), day-use demand is currently near defined capacities. Limiting VAOT at specific parking areas (e.g., the larger day-use lots), through a Traffic Diversion System at the entrance to East Valley, or through a Day-use Reservation System are different options in the MRP.

21. Does the park already occasionally limit vehicles into East Valley?

Yes, Yosemite already manages vehicle congestion in East Valley – but only during short periods when day use parking is fully occupied and near-gridlock traffic conditions are imminent. Colloquially known as "the shunt," this existing version of the proposed Traffic Diversion System is currently implemented on an *ad hoc* basis, and is not tied to a specific user capacity. Use has continued to rise in recent years, and the shunt was needed about 20% of summer days in 2011 (a high use year), although it was used less frequently in 2012 and 2013 (lower use years). Alternatives in the MRP define capacities and identify when the Traffic Diversion or Day-use Reservation System will be applied.

22. What is the "Traffic Diversion System" and when would it be implemented?

On high-use days in the past decade, NPS has occasionally instituted a traffic diversion at the El Capitan Crossover to re-direct incoming traffic away from the East Valley. This action is implemented to avoid gridlock and facilitate emergency vehicle access, and it is triggered by professional judgments about whether day-use parking lots are full or long queues are forming at East Valley intersections. All private vehicles are required to go to other areas of the park during the diversion period (which typically last from one to five hours). In recent years, "shunted" visitors receive information about other places in the park to visit, and a time-stamped card that allows them to enter East Valley when traffic has decreased.

Anecdotal data suggest this traffic diversion has been used on days when inbound traffic to the East Valley exceeds approximately 6,300 vehicles per day, but it has not been formally tracked. The two higher use alternatives in the MRP (Alternatives 5 and 6) would implement a Traffic Diversion System that meets defined capacities, when parking lots are full and before traffic is congested. The system would limit VAOT in East Valley to 90% of available parking plus modeled road capacity. NPS will continue to publish traffic forecasts to let people know which days of the summer they might encounter a traffic diversion during peak hours of the day NPS is continuing to develop technologies to alert visitors to traffic delays and closures before they enter the park.

23. Besides traffic diversions, what other measures are used to manage traffic in Yosemite Valley?

In addition to traffic diversions that occasionally limit total vehicles in East Valley, several other traffic management actions are regularly used to manage traffic, as listed below.

- Crossing guards" at pedestrian crossings at Yosemite Falls, Camp 6, and Bridalveil Fall to protect pedestrians and keep traffic moving.

- Directed parking at Camp 6 to maximize the number of vehicles in the generally unmarked gravel lot.
- Directed RV parking areas at Camp 6 (because a single RV parked inefficiently utilizes as many as 8 spaces for smaller vehicles).
- Commercial tour bus requirements that limit locations where busses can stop or park.
- Campground host enforcement of campground parking rules (limiting number of vehicles, where they can park, etc.).
- Enforcement of "no parking" rules along park roads without dedicated parking spaces (especially where these are unclearly defined or identified by curbing, boulders, or logs).
- Education programs encouraging employees to minimize their use of public parking areas.
- Lane closures during gridlock periods to ensure access for public health and safety, emergency vehicles.

On some days, NPS takes "extraordinary measures" to mitigate impacts from heavy traffic and high use, sending as many as a dozen traffic staff to known bottlenecks in the circulation system, parking areas, and pedestrian crossings. It was clear that many of these actions are operationally challenging and probably not sustainable over the long term, so capacities and related transportation infrastructure in each alternative were developed assuming "reasonable" rather than "extraordinary" traffic measures.

24. What is the Day-use Reservation System and when would it be implemented?

A Day-use Reservation System is another way to manage day use capacities in Yosemite Valley. This would allocate a majority of spaces in day-use parking areas for those who had reservations, while leaving other spaces for more spontaneous users. This system would be applied in alternatives where demand is high relative to capacities, and the onsite Traffic Diversion System could not handle the overflow (displacing East Valley crowding to other parts of the park, or creating unacceptable congestion at the diversion location). Alternatives 2, 3, and 4 would require a Day-use Reservation System because at-one-time visitation demand is likely to substantially exceed parking availability.

25. Does the plan provide details about a potential Day-use Reservation System?

No, the details of a day-use reservation system have not been developed in the MRP and would require additional tiered planning and compliance (analogous to the Half Dome EA, but much more complex). Allocating day-use reservations for as many as several thousand parking spaces in different locations around Yosemite Valley is complicated, and requires careful assessment of the choices and potential consequences. If a Day-use Reservation System is planned, NPS could consider implementing a "Trial Day-use Reservation System" first. A Trial System could allow visitors to reserve some spaces, allowing NPS to test options on a smaller scale and assess operational logistics and visitor responses. Although visitors are used to making reservations for many components of their trips to national parks like Yosemite, any reservation system should be developed with great care. For many visitors the system may be their first impression of the park, their only interaction with NPS staff, and could influence their lasting memory of the visit, so it will be important to "get it right."

26. What issues need to be resolved to implement a Day Use Reservation System?

In order to develop a successful Day-use Reservation System, several issues will need to be addressed. Some major issues are discussed as examples below, but this list is no substitute for careful development through tiered planning and compliance. For many visitors, this reservation system may be the "face of Yosemite National Park."

Seasonality: The system could apply throughout the non-winter high use season (mid-April through October), although existing information suggests the critical period is mid-May through August.

Daily hours. Capacities are generally reached during peak use periods from late-morning through late afternoon. The system could require reservations only for visitors who planned to be in the East Valley during this peak use time.

Primary allocation mechanism: A reservation system would probably provide for online access, perhaps with options for in-person reservations at entrance stations and visitor centers.

Secondary allocation mechanism: Most reservation systems re-allocate cancellations and "no shows" to improve efficiency, allowing spontaneous users to utilize unused spaces. An online system could allocate cancellations on-line as soon as they are available, with "no shows" available online or at entrance gates after a certain time (e.g., 11 am).

Timing of availability: Reservation systems can make proportions of reservations available at different times prior to use (e.g., six months, three months, one month, one week, and/or one day ahead). Such timing provides for visitors with different planning horizons. Online systems can continually track the availability of spaces; this provides feedback to visitors for planning their trips, and to NPS staff for adjusting proportions in the future.

Compliance: There are several options for checking reservation system compliance, including entrance gates or on-site checks of self-printed dashboard parking passes.

Fees: A nominal fee may be required, similar to those levied for Half Dome or other similar permits.

Combining with Park Entrance Fees: A system could allow payment of park entrance fees when making day use reservations. This could reduce time at entrance stations, especially if combined with a faster "pre-paid" lane at entrance gates.

Overnight visitor parking issues. Overnight visitors could receive parking passes associated with their overnight reservations and thus would not need a separate day use pass.

Employee parking issues. Parking by NPS or concessionaire employees would need to be addressed. In general, it would make sense to develop a fair and enforceable system that encourages NPS and concession employees to use designated employee parking areas and minimizes their use of public parking.

Other Technical Issues

27. Why is the "existing situation" or "baseline condition at designation" important in user capacity analyses?

The existing situation is an important reference point because it is what planners, stakeholders, and the public know best and is easiest to understand. Baseline condition at time of WSRA designation is another

important reference point, with some added legal implications (see Chapters 2 and 5, and Part I of this Appendix). But neither existing nor baseline conditions are necessarily "best," and planning was designed to explore different ways to protect and enhance values in the Merced corridor with different capacities.

The attention to baseline and existing conditions also recognizes that no resource area is a "blank slate" during planning. Historical conditions, existing infrastructure, and traditions of management have a kind of inertia, and it's important to be realistic about which elements of the existing situation will likely remain (see discussion on "reasonable range" above). A deliberate process was used to evaluate restoration and facility changes before capacity analyses were fully applied.

28. Does a given level of encounters equate to crowding?

No. This confuses an impact (encounters) with the evaluation of the impact (crowding, better described as "perceived crowding"). Crowding involves an individual's judgment about the acceptability of the number of other people encountered compared to their personal norm or expectation for a particular place. Social norms for encounters are usually lower for more remote, solitary backcountry areas and higher for frontcountry areas. Park managers reviewed studies from Yosemite and other similar settings to develop social standards for the different settings.

29. How are capacities different from "estimated visitation?"

User capacities identify the maximum number of people in specific locations and time periods in different alternatives. These capacities are based on how much use can occur ***at one time*** without causing conditions to reach unacceptable levels, and they consider the combined effects of overnight use and day use during peak periods. Managers, stakeholders, and the public are also interested how these capacities will produce different use levels over an entire day, season, or year. Assumptions and logical calculations were used to translate capacities into these other use metrics, which we have labeled "estimated visitation" – the use level that is expected to occur with a given capacity.

For example, the capacities for campgrounds assume full occupancy (e.g., 6 people per site), while the realistic "visitation estimate" is calculated by the number of sites times the long-term average occupancy (about 4 people per site). Similarly, capacities are set for day use at one time based on assumptions about people per vehicle (about 2.9), parking occupancy levels (90% full), and the number of vehicles circulating on roads, but at one time capacities can be translated into daily day use visitation estimates by applying parking turnover rates developed from transportation modeling.

30. What are "indicators" and "standards?"

Indicators are variables selected to represent important ecological, cultural, or experiential conditions in a given setting. Standards define thresholds for those indicators, establishing the benchmark for acceptable conditions.

Establishing indicators and standards is an important step in addressing user capacity. For WSRA, indicators typically represent conditions of specific river values. The MRP identifies at least one indicator for each river value to assess and monitor conditions. Some indicators are more related to visitor-use impacts than others. For example, to assess the quality of recreation values in wild segments, NPS monitors the number of other people encountered along a trail per hour. This indicator is directly related to the

amount of use occurring in a segment, and is managed through backcountry trailhead quotas. In contrast, water quality is more closely tied to point sources of contaminants, which may be linked to variables other than visitor use. For more on indicators and standards, see Chapter 5.

31. What are "other management actions," and how do they work with capacities to protect river values?

Not all conditions are related to use, and there are many other actions in the plan besides managing use levels. Many of these other management actions (including education, regulation, infrastructure, and restoration) moderate how use affects conditions. Capacities may change as other management actions change, so actions must be specified in order to develop capacities that "fit" with the entire management prescription in an alternative (see examples in Part IV on page S-33 of this appendix).

32. How was capacity in this MRP addressed differently from the 2005 MRP?

The 2005 MRP addressed capacity differently than the current plan, offering different capacity conceptualizations and programs in different alternatives. The preferred alternative in the 2005 MRP proposed implementing NPS's Visitor Experience and Resource Protection (VERP) impact management program over a five year period, with interim capacities set to existing facility capacities through that time. The 9th Circuit Court eventually found the 2005 MRP capacity alternatives inadequate, noting the importance of numeric capacities linked to OR values, and taking proactive steps to ensure that impacts do not violate standards. The MRP has addressed this concern by following a capacity-focused planning process with distinct differences from the VERP framework as specified in the 2005 MRP. Table S-1 compiles a partial list of these differences.

TABLE S-1: COMPARISON OF CAPACITY ANALYSIS DIFFERENCES IN THE 2005 AND 2014 VERSIONS OF THE MRP

Topic	2005 MRP	2014 MRP
Outstandingly Remarkable Values	Considerably less detailed.	More detailed ORVs with explicit variables that indicate existing conditions and conditions at the time of designation.
Restoration	Restoration initiatives were not explicitly linked to ORVs, infrastructure decisions, or transportation modeling, and were not integrated into capacity decision-making.	Specific restoration initiatives are linked to biological and cultural ORVs, and explicit infrastructure options (for transportation, housing, camping, and lodging), which affect capacities in alternatives.
Facilities/ services	Preferred alternative adopted interim capacities tied to existing facilities/services, without reference to effects on ORVs or an analysis of need. Facilities, including day use parking, were taken as "givens" rather than "variables" in alternatives.	The plan includes an explicit analysis of facility/service needs. Alternatives identify different levels of facilities/ services and explicit tradeoffs with conditions and capacities.
Indicators and standards	Plan promised a five year development of indicators and standards through the VERP framework, but provided only examples of potential indicators and standards. These were not explicitly tied to ORVs and were not variables in alternatives.	Explicit indicators and standards are developed for all ORVs. Conditions vary across alternatives, showing tradeoffs with infrastructure and capacities.
Use-condition relationships	Preferred alternatives promised to address use-condition relationships with the VERP framework in five years, but provided limited information about effects of use on ORV conditions. The plan did not identify limiting factors for capacities.	Explicitly identifies use-condition relationships and specifies when ORVs are related to use. Identifies conditions that are the limiting factors for capacities, and shows how different alternatives provide different conditions and capacities.

TABLE S-1: COMPARISON OF CAPACITY ANALYSIS DIFFERENCES IN THE 2005 AND 2014 VERSIONS OF THE MRP

Topic	2005 MRP	2014 MRP
Actions before unacceptable impacts	Promised to address impacts that violate standards through the VERP framework within five years. Indicates that capacities may not be necessary, and that capacities will be "discovered" when conditions violate standards (allowing conditions to reach unacceptable levels). Does not specify how capacities will be enforced after interim period.	Identifies specific actions to be used to address conditions that are trending downward, before impacts reach unacceptable levels defined by standards. Identifies actions that will be used to enforce capacities as necessary.
Monitoring	Promised to identify indicators and develop explicit protocols within five years.	Specifies indicators and monitoring protocols, with links to actions that will be implemented to enforce capacities and protect river values.
Range of capacities	Alternatives offered different conceptualizations of capacity programs, not a reasonable range of capacities, conditions, and infrastructure.	Action alternatives explicitly compare a reasonable range of capacities, conditions, and infrastructure. All alternatives protect /enhance ORVs, but in different ways and with different tradeoffs.

33. What activities are included in the Yosemite Valley recreation ORV?

The Valley Recreation ORV (ORV 20) discusses a range of recreation activities, including "active pursuits such as hiking, biking, swimming, floating and water play, climbing, camping, or fishing; creative pursuits such as writing, painting, photography, and other arts; and educational and interpretive pursuits such as attending ranger-led walks and programs; or even simple passive pursuits such as viewing scenery from overlooks or while driving." The Recreation ORV also recognizes there are "important social elements to these activities, including group camping and picnicking, while others offer opportunities for solitude and reflection."

"Overall, the Yosemite Valley segment offers a variety of outstanding opportunities for frontcountry river recreation for people of all ages and abilities. The Merced River in this segment allows people to immerse themselves in their surroundings, taking in the sights, sounds, and feel of the river and its dramatic backdrop. These experiences, in turn, relieve stress and promote connection to the natural world."

These ORV-related recreation activities are distinguished from others such as eating in restaurants, shopping, spending the night in lodging, or moving around the Valley by different types of transportation. However, it is sometimes challenging to draw a clear line because visitors to Yosemite Valley engage in a mix of activities during a visit, and all contribute to the overall quality of the experience. As directed by WSRA, the MRP focuses on protecting and enhancing the river- and resource-related recreation activities. But in doing so, NPS recognizes that opportunities to shop, eat in a diversity of restaurants, or stay in diverse types of lodging are activities important to many visitors and are permitted in the river corridor under WSRA and the Secretarial Guidelines as long as they do not "substantially interfere" with the use and enjoyment of river values.

34. How are the "adverse impact" and "degradation" concepts related to capacities?

As discussed in Chapter 5, these terms have been defined for the Merced River Plan in response to WSRA and Merced litigation. The MRP has specified adverse impact and degradation levels that NPS will proactively avoid, and these are common to all alternatives. They define a "floor" below which no impact will fall. However, NPS has also identified management standards for each indicator that are "better" than adverse impact or degradation levels. Because capacities are based on these better standards that NPS also

intends to achieve proactively, adverse impact and degradation levels are not central to determining capacities in the MRP.

35. Are visitors sensitive to ecological impacts in riparian or meadow areas?

Data from the river study (Whittaker & Shelby 2011) show users evaluate acceptability of ecological impacts differently than park ecologists. Data also show river users care about ecological impacts because they support boardwalks, fences, closures, and education programs to protect ecological values. If experts identify the areas needing protection, it is likely that most visitors will support programs that protect resources as long as access to important recreation areas is still allowed.

36. Can user capacities be changed after the plan is completed?

Yes. The NPS has applied the best-available scientific information in the MRP to make decisions about management standards and user capacities. Monitoring and adaptive management allow the NPS to evaluate decisions and consider changes in the future. Depending on the situation, changes might be subject to renewed planning and environmental compliance requirements under NEPA and WSRA.

37. What research was used to develop capacities?

When developing capacities for the MRP, NPS considered a wide range of research and monitoring studies regarding the quality of recreation opportunities, transportation, and visitor experiences. These included studies on: general visitors to the park; wilderness and backcountry use; social impacts and recreation use in Yosemite Valley (including visitors at attractions like Yosemite Falls, trail users, boaters, and shore/beach users along the river); transportation impacts and modeling; and general monitoring of visitor and recreation use. Example studies are listed chronologically within topic areas in the Table S-2.

TABLE S-2: EXAMPLES OF STUDIES OR MONITORING REPORTS USED TO CONDUCT MRP CAPACITY ANALYSES

Reference	Comments
Background or historical studies	
Gramann (1992)	Early conceptual review of capacity issues in Yosemite.
Whittaker, D., B. Shelby, R. Manning, D. Cole, and G. Haas (2011)	Review paper of capacity issues in research and land managing / planning processes.
Whittaker, D., B. Shelby, B. Meldrum, H. DeGroot, and J. Bacon. (2012)	Summary of capacity process and key findings from social research being developed for Merced River Plan.
General visitor surveys	
Co, Kurani, and Turrentine (2000)	A study of visitor bicycle use and attitudes in Yosemite Valley in 1999.
Littlejohn, M.A., Meldrum, B. H., and Hollenhorst, S. J. (2006)	2005 general visitor survey (summer season).
Le, Y., E. Papadogiannaki, N. Holmes, and S. J. Hollenhorst (2008)	2007 general visitor survey (winter season).
Blotkamp, A., Meldrum, B., Morse, W., and Hollenhorst, S.J. (2010)	2009 general visitor survey (summer season).
Social conditions in higher density areas	
Manning, R., B. Wang, W. Valliere, and S. Lawson (1998)	1998 density evaluation studies at Yosemite Falls and Vernal Fall.
Manning, R., W. Valliere, S. Lawson, B. Wang, and P. Newman (1999)	1999 density evaluation studies at Bridalveil, Glacier Point, and Mirror Lake.

TABLE S-2: EXAMPLES OF STUDIES OR MONITORING REPORTS USED TO CONDUCT MRP CAPACITY ANALYSES

Reference	Comments
Manning (2007).	Summary of Manning and Lawson et al. research in book chapter form.
Lawson, Kiser, Hockett, Reigner, Chamberlin, and Choi (2008)	2007-2008 density evaluation studies and modeling for several Yosemite Valley sites.
Lawson, S., P. Newman, J. Choi, D. Pettebone, and B. Meldrum. (2009)	Summary of Manning and Lawson et al. research in a journal paper format.
Whittaker and Shelby (2012)	2011 density evaluation studies for beaches and boating segments in Yosemite Valley.
Resources Systems Group, Inc (2014)	Refined analysis and modeling for Vernal Fall, Yosemite Falls, and Bridalveil Fall using most recent data and monitoring protocols.
Wilderness conditions	
Van Wagtendonk, J. W. (1986)	Summary paper on Yosemite Wilderness capacities (includes analysis of trailhead quotas and zone capacities).
Broom and Hall (2009)	A guide to monitoring encounters in Wilderness.
Broom and Hall (2010)	Wilderness encounter levels in the Tuolumne River corridor.
Fincher (2010)	Wilderness permit system description.
Van Kirk, R., S. Martin, K. Ross, and M. Douglas (2011)	2011 Modeling of overnight wilderness use in Yosemite.
Transportation modeling	
deGroot (1998)	Internal memo with a chronology of parking changes in Yosemite Valley since 1969.
DEA (2003)	Traffic modeling "trip tables" summary report from 1999 data.
Dillworth (2003)	PhD. dissertation on visitor perceptions of alternative transportation and intelligent transportation systems in National Parks.
White, D. (2006)	Paper assessing attitudes toward alternative transportation in Yosemite Valley.
DEA (2006)	Summary of East Yosemite Valley visitor transportation system from August 2006 data.
Chase, I. (2008)	Oct. 2008 memo summarizing a Yosemite Valley travel forecasting model (VISSM) developed in 2003 from 1999 data.
DEA (2010)	Summary Powerpoint of license plate survey from July 2010.
Resources Systems Group, Inc (RSG), Jones and Jones, and Ostrom (2011)	Yosemite NP transportation improvement strategies (TISR) report.
Byrne, W., I. Chase, and S. Tschuor. (2011)	Summary of initial transportation modeling scenarios.
Meldrum & Henderson (2011)	Powerpoint summary of Memorial Day 2011 traffic monitoring.
White, D. D., S. Tschuor, and W. Byrne. (2012)	Paper summarizing visitor evaluations of road conditions and simulation modeling.
Whitaker and Shelby (2012)	Report discussing tradeoffs of different transportation infrastructure
CRC, DEA, and IBI (2012)	Summary of "tradeoffs and implications" of transportation strategies for the Merced Corridor.
DEA, IBI, and CRC (2012)	Summary of transportation and visitor mobility modeling for Merced River Plan.
NPS (2013)	Working parking inventory spreadsheet tracks type and location of parking availability across alternatives.
NPS use monitoring	
NPS (2004-2013)	NPS conducts use monitoring at several locations in the Merced Corridor on a periodic basis and summarized in field monitoring guides (protocols) and annual reports (results). Key use information includes boating use (2007 and 2011); East Valley beach use (2009, 2010 & 2011); trail use to Vernal Falls (2007 & 2010); Bridalveil Falls use (2007 & 2011); and Yosemite Falls use (2007 & 2010).

Collectively, these studies helped identify user groups; activity participation; importance and quality of facilities; travel patterns; types of experiences; and evaluations of encounter levels or use densities at attraction sites, riverside beaches, boating segments, or road segments. They also helped assess relationships between use and conditions, and the acceptability of management actions that might be used to address problems or enhance experiences.

The information was used to identify a diverse range of indicators of recreation quality that include trail encounters in backcountry areas, and user densities at several attractions and shore or boating use areas in Yosemite Valley. Alternatives in the FEIS consider a range of recreation experiences, showing how different capacities and other management actions produce different conditions.

38. Were campers and overnight users included in these studies?

Campers were included in several studies, including those on use-related conditions along the river and at specific attractions in Yosemite Valley, although these studies did not specifically address preferences for different types of camping (e.g., auto-based, RV-based, walk-in, or backcountry). More information about visitors' preferences for different types of camping or overnight accommodation could be helpful, but there is probably more demand than supply for any particular type of camping in Yosemite. Ratings from a recent general recreation survey (Blotkamp, et al., 2010) show that most current visitors rate existing campgrounds and in-park lodging "very important" or "extremely important" (92% and 91%, respectively), and rate facility quality as "good" or "very good" (72% and 67%, respectively).

39. What new studies should be done as part of MRP tiered compliance?

Stakeholders have expressed interest in additional research before elements of the MRP are implemented. Several actions in the preferred alternative (e.g., road re-alignments, new campground development, and Bridalveil redesign) will require tiered compliance; this might provide opportunities for additional studies about visitor preferences for different camping options or the Bridalveil viewing platforms and trails. Large scale surveys may not be possible or necessary as part of planning, but smaller scale social science research would be useful. Well-designed studies that include direct observations, focus groups, and systematic assessments of stakeholder and public comments could be developed concurrent with tiered compliance.

40. What types of overnight accommodation are provided for in the plan?

Alternatives in the MRP considered changes in the amount and diversity of different types of camping and overnight lodging. Without reducing the current number of traditional auto-based campsites, the preferred alternative increases the quality of experiences by adding about 130 walk-in sites and a separate RV loop. The range of camping opportunities provided in the MRP includes:

- Single party camping in undeveloped sites in remote backcountry areas
- Higher density backcountry camping areas such as Merced Lake and Little Yosemite Valley
- Frontcountry walk-in camping in Camp 4, Upper Pines, Rivers, and Backpacker's Camp
- Auto-based camping at several campgrounds, including an RV-only loop
- Group camping at Yellow Pine, Upper Pines, and Wawona

The plan also provides for a mix of lodging types, including:

- Suites and standard hotel rooms at the upscale Ahwahnee
- Standard and larger family rooms at the Yosemite Lodge and Wawona Hotel
- A diversity of soft-side and hard-side cabins and hotel rooms at Curry Village
- Open air shelters at Housekeeping (a hybrid camping/lodging opportunity)

41. Will the MRP manage East and West Valley segments differently?

Yes. Since at least 1930, NPS has roughly adhered to Frederick Olmstead Jr.'s concept to concentrate development and use in East Valley and minimize development west of Yosemite Lodge and Camp 4 (defining what has come to be known as the "Olmstead line"). The MRP formalizes this tradition in several ways:

- The East Valley segment (2a) is classified through WSRA as "Recreational," while the West Valley (2b) is classified as "Scenic." According to the 1982 WSRA Secretarial Guidelines, a Scenic segment features shorelines and immediate environments that are "largely primitive" and do "not show substantial evidence of human activity" although such segments can be accessible in places by road. A Recreational segment, by contrast, may be "readily accessible by road" and have "residential, commercial or similar development" along its shorelines.
- The preferred alternative explicitly states that West Valley (segment 2B) will be managed to retain its overall natural character consistent with its Scenic classification, including minimizing the number of structures. The only buildings in the corridor are toilets at Bridalveil Fall, Yellow Pine, Cathedral Beach, and El Capitan.
- With the exception of the volunteer campground at Yellow Pine (which is technically just west of the "Olmstead line" and the East/West segment divide at Sentinel Beach), there is no overnight accommodation or camping in West Valley.
- Parking in West Valley is limited to small turnouts with the exception of the Bridalveil Fall area.
- Bridalveil Fall is the only higher use and development area in West Valley; it is slated for major site redesign and capacity adjustments to address perennial congestion and impact problems (see discussion in Part IV below).
- West Valley will be managed for self-reliant recreational opportunities that include hiking, rock climbing, boating, photography, and scenic viewing, but with lower densities or encounter levels than in East Valley, explicitly recognized by management standards and associated management actions.

42. Why doesn't the MRP set different capacities for East and West Valley?

Although use densities and encounter levels in the West Valley will be lower than in the East Valley, it is not necessary to develop separate capacities for the two segments. All East Valley use passes through West Valley, and much of the use in West Valley comes from people based in East Valley (either overnight or parked for the day). West Valley daily use thus needs to accommodate pass-through East Valley use, although West Valley's lower density sites will be managed for different standards to provide different experiences (see discussion above). In any case, Chapter 6 of the CMP/EIS specifies separate capacities for East and West Valley (Segments 2A and 2B).

PART IV: ILLUSTRATIVE FINDINGS FROM CAPACITY ANALYSES

This part illustrates capacities and their basis for specific locations. They are not comprehensive of all capacities in the MRP, but they provide examples of information, analysis, and findings that helped with capacity decisions. References are provided for readers with more interest.

Wilderness: Segments 1, 5, and 8

The following summarizes findings for Wilderness and backcountry segments in the Merced River Corridor: Segment 1- Merced above Nevada Falls, Segment 5- South Fork above Wawona, and Segment 8- South Fork below Wawona.

Social Conditions are a Limiting Factor

The primary bases for capacities in Wilderness segments were social conditions related to the Recreation ORV and Wilderness solitude. Research in Yosemite and similar backcountry areas show that social conditions along trails and at camping areas are related to use levels (Vaske et al. 1986; Shelby et al. 1996; Manning 2010). The primary indicator representing solitude in Segment 1 is "wilderness encounters," defined as the number of other groups seen per hour on trails. As discussed in Chapter 5, encounters have a long history of management in backcountry areas and often have direct relationships with perceived crowding, a negative evaluation of encounter levels in a particular situation. In low-density backcountry areas, studies often measure encounters per day (Vaske et al. 1986); in higher-density settings the focus has shifted to encounters per hour (examples include Tioga Road backcountry in Yosemite, and several U.S. Forest Service wildernesses in Oregon and Washington).

Biological Conditions are Best Addressed by Non-Capacity Actions

Although Wilderness/backcountry areas in the Merced Corridor have biological, geologic/hydrologic, and scenic outstandingly remarkable values, none of these ORVs are substantially affected by the amount of current or potential visitor use. For example, while trails, dispersed campsites, designated camping areas, and the High Sierra Camp at Merced Lake have site-specific biological impacts, these are caused more by type and location of use than the amount of use. In addition, most site impacts can be addressed by improved trail design, campsite location, and "Leave No Trace" behavior. Similarly, the scenic impacts associated with development at those camps and associated ranger/trail crew facilities can be addressed though design and construction practices rather than user capacity decisions.

The MRP Considers Adjustments of the Existing Backcountry Capacity System

Overnight Wilderness use in Yosemite has been limited to capacities through a backcountry permit system since the late 1970s. The overnight backcountry permit system manages trailhead quotas (people per day at different locations) to meet zone capacities (where hikers spend the night). The system was originally developed through travel pattern and ecological impact studies (Van Wagtendonk, 1986), with some quota reductions in the late 1990s (particularly to address rapidly increasing demand for Half Dome). The MRP considers additional adjustments to the system through reductions of some Wilderness zone capacities in the Merced Corridor based on a more recent assessment of travel patterns (Van Kirk et al., 2011) and expert judgment in order to meet defined standards (see below). Some alternatives also reduce the number of

people camping in areas such as Little Yosemite Valley (LYV), and specify boating capacities (pack rafts or hard shell kayaks) on river reaches in these backcountry segments (See Appendix R: Boating Opportunities).

Day users in Segment 1 (Above Nevada Falls) are also partially limited by the Half Dome permit system. First tested in 2010, a revised system was established in 2013 after extensive planning and public comment. It limits Half Dome ascents to 225 day users plus 75 overnight users. The MRP assumed continued use of this system, with no adjustments.

Taken together, the overnight backcountry and Half Dome permit systems limit the number of people starting from each trailhead and spending the night in different parts of the Wilderness. The permit systems protect recreation values by spreading use over a wide area to keep trail encounters and camping concentrations at acceptable levels defined by standards (see below).

Backcountry Encounter Standards

The wilderness encounter indicator is measured by infrared trail counters on representative trail sections in the corridor. A robust research protocol developed in Tuolumne Meadows converts counts of individuals passing per hour into group encounter rates (Broom and Hall 2010). The average number of encounters per hour through the sampling period must be lower than the standard for that trail section; if standards are violated on a trail segment (or combination of two or more sections) for four consecutive years, the standard is violated on a segment-wide basis.

Trail encounter standards range from 2 to 4 encounters per hour for different trail sections, with lower encounter levels on sections that are farther from developed areas and thus offer greater opportunities for solitude. Alternatives with different backcountry capacities would produce lower encounter conditions for some trail sections to represent a reasonable range of opportunities for solitude. These alternatives illustrate tradeoffs between access and solitude, with reduced overnight use at Little Yosemite Valley or Merced Lake HSC offering lower encounter rates on trails, a smaller development footprint, and thus a more primitive experience (although fewer people would be able to access the area each day).

Relationships between Trail Encounters and Use

The relationship between wilderness use level and trail encounters is direct and linear, with lower use and encounter levels on trail sections farther from trailheads and developed areas (Cole and Hall 2008; Cole and Stewart 2010; Newburger et al. 2009; Vande Kamp 2009). Trail encounters are also lower during lower use times of the day, week, or season. Use is currently limited to the capacities identified in the highest use alternative (6), allowing for accurate descriptions of encounters (based on current monitoring) under that alternative. For lower use alternatives, professional judgment has been used to predict the effects on encounters from reductions in LYV or Merced HSC use.

Capacities in the Transition Trail Section between Nevada Falls and LYV

The roughly one-mile trail section from Nevada Falls to Little Yosemite Valley is managed differently than the other Wilderness and backcountry trails. With higher use because of overlap with the Half Dome route and an estimated 50 to 100 day hikers who travel for short distances upstream from Nevada Falls, this trail section has encounter rates higher than other Segment 1 standards (but about 65% lower than historical peak-use levels before Half Dome ascents were limited). The plan recognizes this as a high use area between

higher density day use below Nevada Falls and the lower density opportunities for solitude upstream of Little Yosemite Valley, which few day users reach.

Capacities and Little Yosemite Valley Camping

Most overnight use in Segment 1 occurs in the Little Yosemite Valley zone, which has a current capacity of 150 people. Due to concentrated use in this zone, overnight camping is restricted to designated "backcountry camping areas" at Little Yosemite Valley and Moraine Dome which have bear boxes and composting toilets (different from most other backcountry zones with dispersed camping and no facilities). The MRP considered changes in LYV zone capacities to provide a range of visitor experiences in Segment 1. The lower use levels in these alternatives would require less infrastructure and lower intensity management, and the designated camping area at Little Yosemite Valley would be eliminated in Alternatives 2 and 3, and visitors could select their own campsites farther from other campers. The composting toilet at Little Yosemite Valley would be removed in Alternative 2. In the remaining Wilderness zones, capacities would remain at current levels under all alternatives.

Merced Lake High Sierra Camp and Capacities

The Merced Lake High Sierra Camp (HSC) is an historic, primitive lodge located within a potential Wilderness addition. Operated by the park concessioner, it offers food service and 22 tent cabins, which accommodate a total of 60 people. Capacity is managed by reservations. The preferred alternative reduces capacity to 42, and the MRP considered other options, including removal (Alternatives 2 and 4), and conversion to a temporary pack camp with a capacity of 15 people (Alternative 3).

Stock Use Capacities

Stock use (horses and mules) is related to the development and capacity decisions at the Merced Lake HSC, as well as stock used by NPS for trail maintenance and law enforcement. Stock use capacities were developed based on encounter standards with hikers, following from research in nearby Sequoia and Kings Canyon National Parks. The study found that encounters with a string of stock detract from backcountry Wilderness experiences, but that average "acceptability" was "no more than three stock parties per day" (NPS 2013, p. 56).

Current concession-related stock use in summer is typically 7-8 strings per week to supply the Merced High Sierra Camp. Stock spend the night and then return to the Valley the next day (for a total of 14-16 one-way trips per week). Assuming most hikers travel this route once per day, they are unlikely to encounter more than two HSC pack strings per day. NPS stock use is estimated at 330 stock-nights per season below Washburn Lake; assuming animals travel in strings of six, this is about 110 one way trips per season, or about one trip per day (Baseline Conditions Report, Table 2.1-1, page 2.1-14). Combined with concessioner-related stock use, total pack string encounters typically will not exceed three per day during the ten-week HSC season, and less during the rest of the season.

The preferred alternative would reduce concession stock use by about 30 percent, while Alternatives 2 and 4 eliminate the camp and therefore eliminate concession stock use. Alternative 3 reduces re-supply stock use by about 75%, although it would increase camp set-up and take-down trips at the beginning and end of the season. To ensure that stock encounters do not violate the three encounters per day average, all alternatives that maintain the Merced Lake HSC include a stock-use capacity. In addition, the MRP includes grazing

capacities of 58 stock nights per season for the one meadow in the river corridor where grazing is allowed; this limit was based on the biological ORV (see discussion of ORV 1 in Chapter 5).

Boating Use Capacities

Several Wilderness/backcountry segments were considered for new boating use in the MRP. With no existing use available to judge potential impacts, NPS set initial capacities that allow reasonable access for boating opportunities while protecting river values that include the quality of boating experiences. These capacities were based on logical estimates of encounters on the new "water trails," potential for portage trails or other impacts from boating use, and/or facility capacities at limited launch areas.

The capacities are specified as people per day on Wilderness or backcountry river reaches. These units are consistent with those used for backcountry permit systems (and they are essentially the same as boats per day because most boaters will use single person kayaks or pack rafts). Boating use is expected to be well below capacities and will probably require little management beyond registration/permit programs which will help monitor these new uses. Additional details are provided in Appendix R: Boating Opportunities.

Conclusion

The capacities considered for Wilderness areas were related to management goals, river values, and management standards for these river segments. These include tradeoffs between the amount of access to be provided, the level of infrastructure, and the amount of solitude as measured by encounter rates. For example, in the higher use alternatives, encounter levels in the LYV to Lewis Creek trail segment are twice those in lower use alternatives. The higher use alternatives also maintain LYV designated camp area, Merced Lake camping, and Merced Lake HSC at use levels similar to recent management; this requires more infrastructure (LYV toilet, HSC facilities, stock use), and produces higher encounter rates with pack strings and other hikers or campers.

Yosemite Valley

Use and development in Yosemite Valley is multifaceted, and developing capacities for the area is similarly complex. The following sections describe the issues, review technical approaches for collecting and analyzing relevant data, and then summarize findings for several locations. While Valley transportation system performance is an important element in Valley capacity decisions, this topic is addressed separately at the end of the White Paper.

Social Conditions are a Limiting Factor

Social conditions related to the Recreation ORV were a limiting factor for many capacities in Yosemite Valley. Normative research has found that visitors can evaluate different levels of social interaction in recreation settings, and these evaluations inform indicators and standards (Manning et al. 1999; Shelby et al. 1983; Shelby et al. 1989). Analogous to encounters in backcountry settings, user densities become the focus in frontcountry settings, usually targeting defined locations such as viewing platforms, beaches, or higher use trails (Shelby et al 1996; Whittaker 1997; Manning 2007). As discussed in Chapter 5, densities generally influence perceived crowding (Vaske and Donnelly 2002; Needham et al. 2011), have direct relationships with use levels, and are commonly used as indicators in frontcountry settings. If densities are too high for a

given setting, crowding and congestion (negative evaluations of density) can detract from visitor experiences (Whittaker and Shelby 2010). In Yosemite Valley, research on social conditions suggested that current use peaks create substantial congestion and crowding at attraction sites.

Biological Conditions are Best Addressed by Non-Capacity Actions

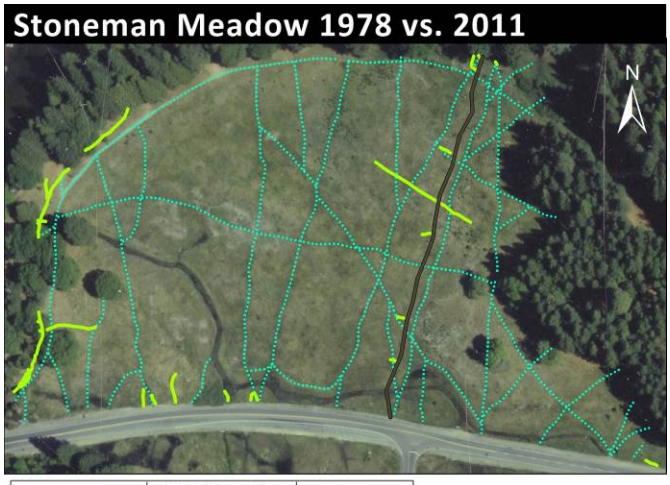
Although the river corridor in Yosemite Valley contains geologic/hydrologic, cultural, and scenic ORVs, none are likely to be substantially affected by the amount of visitor or administrative use and become the "limiting factor." For example, visitor use does not affect large-scale geological/hydrological features like the "Giant Staircase" (Nevada and Vernal Falls). While impacts from use (e.g., erosion or trampling along roads and trails) and infrastructure associated with use (e.g., trails, campgrounds, overnight lodging, restaurants, gift shops, parking lots) could affect geological, cultural, or scenic ORVs, such impacts are more a function of the type and location of use rather than the amount of use.

In addition, many visitor impacts to biological conditions can be controlled by mitigation actions that do not require reducing use. For example, meadow function and health were assessed by a "fragmentation index," the percent of a meadow in its five largest patches. The measure is sensitive to the size of intact areas and the amount of informal trails, and indicates impacts related to meadow hydrology, soil moisture, non-native species, habitat quality, and barriers to small mammals. Although research has documented visitor-related resource impacts in meadows, data and experience in Yosemite showed that fragmentation or other measures of meadow condition were related to type and location of use rather than specific amounts of use. As a result, the focus shifted to other management actions that address those impacts.

Alternatives with different capacities included different levels of infrastructure (boardwalks, trails, and split rail fencing) to control the location and type of use. This addresses the problem by changing the impactful behavior rather than the amount of use, so the meadow condition is no longer a limiting factor for capacity. New road designs remove most roadside parking in all alternatives, and trails/fencing are used to control impacts from increased development (e.g., new or expanded campgrounds) in the two higher use alternatives.

The success of such approaches for biological impacts has been demonstrated at Stoneman Meadow. Fragmentation scores improved from 40% in 1978 to 99% in 2011 as a result of developing a single boardwalk trail through the meadow, even though annual park use rose more than 50% during the same period (see Figure S-1). Monitoring continues to assess meadow condition, use levels, and visitor compliance with formal trails and protective barriers in order to better understand relationships between these variables.

Figure S-1: Stoneman Meadow 1978 vs 2011



Trail Symbol	Total length of trails	LPI-5 Value
1978	3170 meters	40.40
2011	327 meters	99.12

These 1978 informal trail values were determined based on the presence of trails in this aerial photograph from the Yosemite Archives. For LPI-5 values, all 1978 trails were given a default trail width of 12".

Evaluating Social Conditions

The primary indicators selected to represent social conditions in Yosemite Valley were densities at recreation attractions or trails that access them (see list below). Information about these indicators came from studies at popular high-use sites (Manning et al., 1998; Manning et al., 1999; Manning et al., 2003; Lawson et al., 2009), plus research on shore and boating use in East Yosemite Valley (Whittaker and Shelby, 2012). These studies asked visitors to ***evaluate the acceptability*** of a series of photographs depicting different encounter levels (see example of boats on a generic reach of the river in Figure S-2). When plotted on a graph (see Figure S-3), average ratings identify the number of boats that are acceptable (when the curve crosses the marginal line). Follow-up questions asked respondents to identify the photograph that best represents the encounter level they prefer to see (*preference*), or the condition that would cause them not to visit the site again (*displacement*).

Figure S-2: Example simulated photos of boating use (Whittaker & Shelby, 2012)

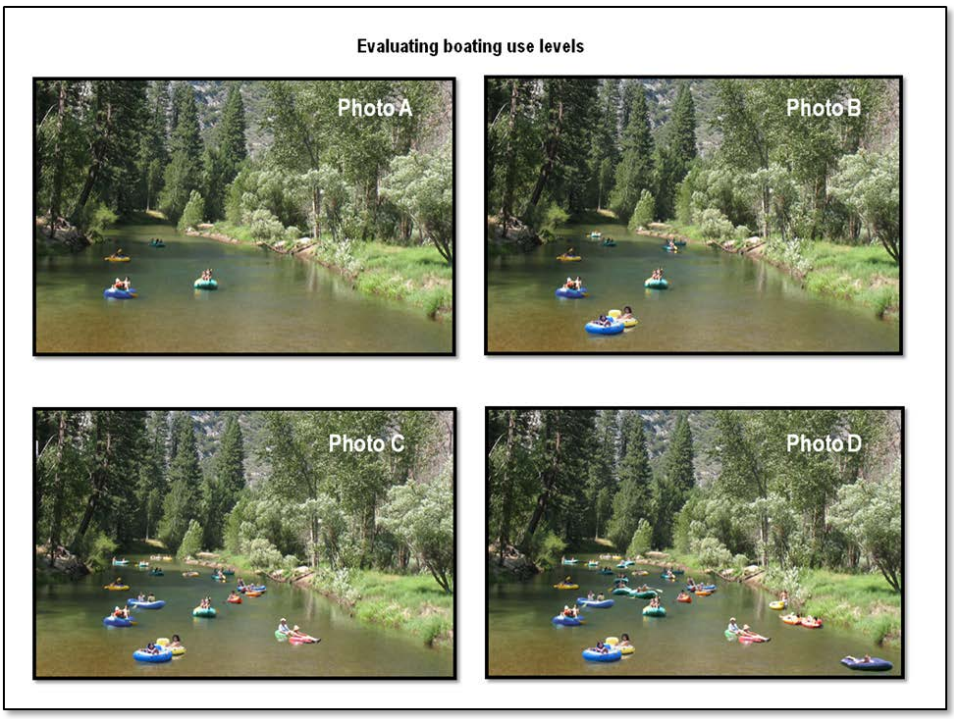


Figure S-3: Acceptability Ratings of Boating Use (Whittaker & Shelby 2012)

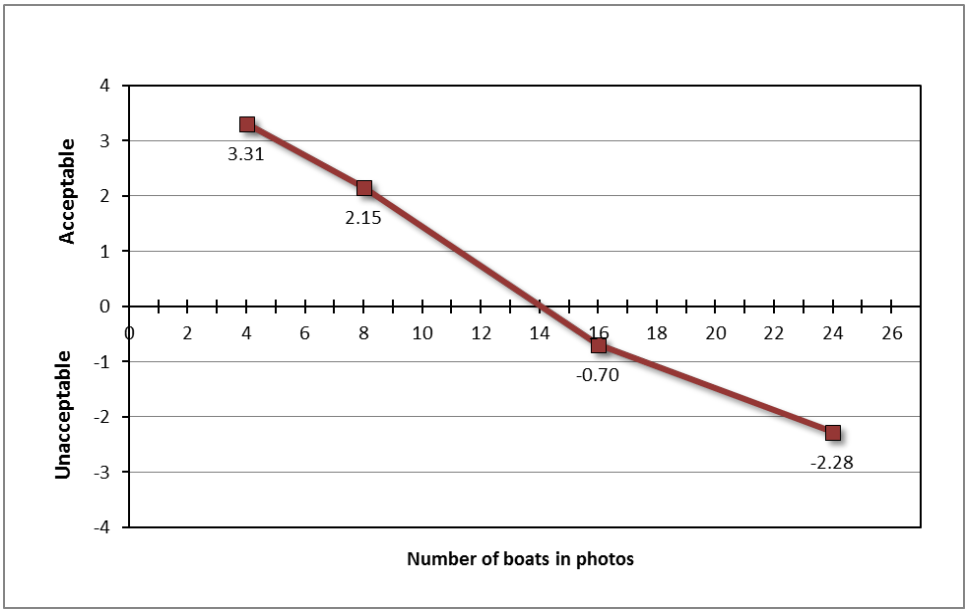


Table S-3 summarizes at-one-time (AOT) evaluations from photos for different locations. As discussed in Chapter 5, the number of people or boats at one time in the photos can be translated into densities (people per square foot or linear foot) based on calculations of the geographic areas in photos. For high use trail segments, falls viewing areas, and beaches with defined boundaries, densities were measured as square feet per person. Boating densities were measured as boats per 500 linear feet in a reach.

TABLE S-3: VISITOR EVALUATIONS OF PREFERRED, ACCEPTABLE AND DISPLACEMENT DENSITIES AT KEY LOCATIONS.

Location	Photo Area (ft^2)	People or boats AOT in study photo			Density (square feet per person)		
		Preference	Acceptable	Displacement	Preference	Acceptable	Displacement
Bridalveil platform	390	8	20	28	49	20	14
YF platform	1,225	30	61	94	30	20	13
Vernal Fall trail	860	11	26	40	78	33	22
Generic beach	4,800	19	48	80	250	100	60
Boating reach	500[a]	6	14	22	--	--	--

NOTE:
[a] Linear feet along a segment of river.

List of Locations for Social Condition Monitoring

Indicators that represent social conditions (visitor densities) at two different scales. ***Site-level standards*** defined thresholds for acceptable conditions at the scale of the recreation site and ***management standards*** represent acceptable conditions at a segment-wide scale. The site-level standards were developed at nine Valley recreation locations, as described in greater detail in Chapter 5. The focus on densities in specific locations follows from research in many frontcountry settings (Manning 2011). The nine locations represent a range of recreation experience types in Yosemite Valley:

- Yosemite Fall viewing platform

- Bridalveil Fall viewing platform
- Vernal Fall trail
- Housekeeping beach (higher use East Valley beach)
- Swinging Bridge beach (higher use East Valley beach)
- Boats at one time: Stoneman Bridge to Sentinel Beach reach
- Boats at one time: Sentinel Beach to Pohono Bridge reach
- Average of three low use beaches (at least two in West Valley)
- Average of three low use hiking trails (at least one in West Valley)

Monitoring Social Conditions

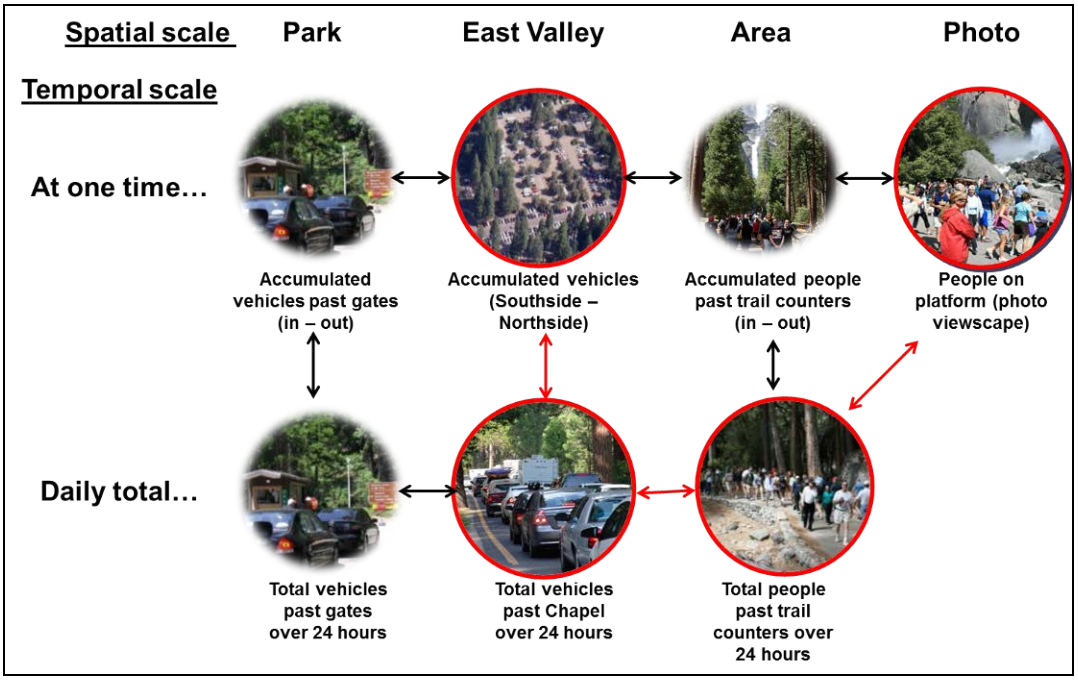
Monitoring for each site will occur on at least 14 days during the primary visitation season (May through September). Sampling will take place on weekends and weekdays during peak visitation hours during the peak season for that location. For example, sampling will not begin along the shore or on the river until temperatures warm and flows are low enough to allow those activities. Waterfall attraction sites would be sampled earlier in the season when flows and visitation are generally higher. Multiple counts will occur at each site at a specified interval (e.g., every 15 minutes) to ensure representation of the highest use times of the day. Sampling times will vary by location type to account for differences in peak use times for each activity (e.g., shore and beach use peaks later in the day than waterfall visitation or hiking).

Each trail and shore site was selected because it represents a particular use level for the activity (e.g., low use trail or high use shoreline). If natural events (e.g., a rock slide or flood), or design changes (e.g., a trail re-routing or widening) influence the fundamental character of the location, researchers will consider whether the site is still representative of the intended recreation experience. If not, a new monitoring site will be chosen. For example, if a high use beach becomes much less popular because it partially washed away or became muddy, another high use beach would be chosen to represent the high use category. Similarly, if the character of an attraction site (e.g. Bridalveil Fall viewing platform) changes due to a natural event or re-design, the site would be re-evaluated based on the new design, and the standard might be altered accordingly.

Observations and Modeling Help "Translate" Use Levels at Different Spatial/Temporal Scales

Studies collected information about densities at different locations, but it was also important to know how site densities are related to other use metrics. The different spatial and temporal scales are illustrated in Figure S-4. The spatial scale ranges from people in the "polygon" in the photos used in studies, to the people in the area, to people in East Valley, and in the entire park. The temporal scale ranges from at one time to daily totals. The most useful variables and relationships (identified in red) "track" use densities from the photos (where we have evaluative information), to total people in the area per day, to total vehicles and people in East Valley per day, to AOT vehicle/people accumulations in East Valley. These translations allow modeling to show how conditions and social standards at specific visitor attractions match up with different levels of overnight and day use. The Chapel traffic counter is a particularly useful "gauge" for the number of cars and people in the highest use part of Yosemite Valley (see discussion in transportation system performance below).

Figure S-4: Translating Use Information at Different Spatial and Temporal Scales



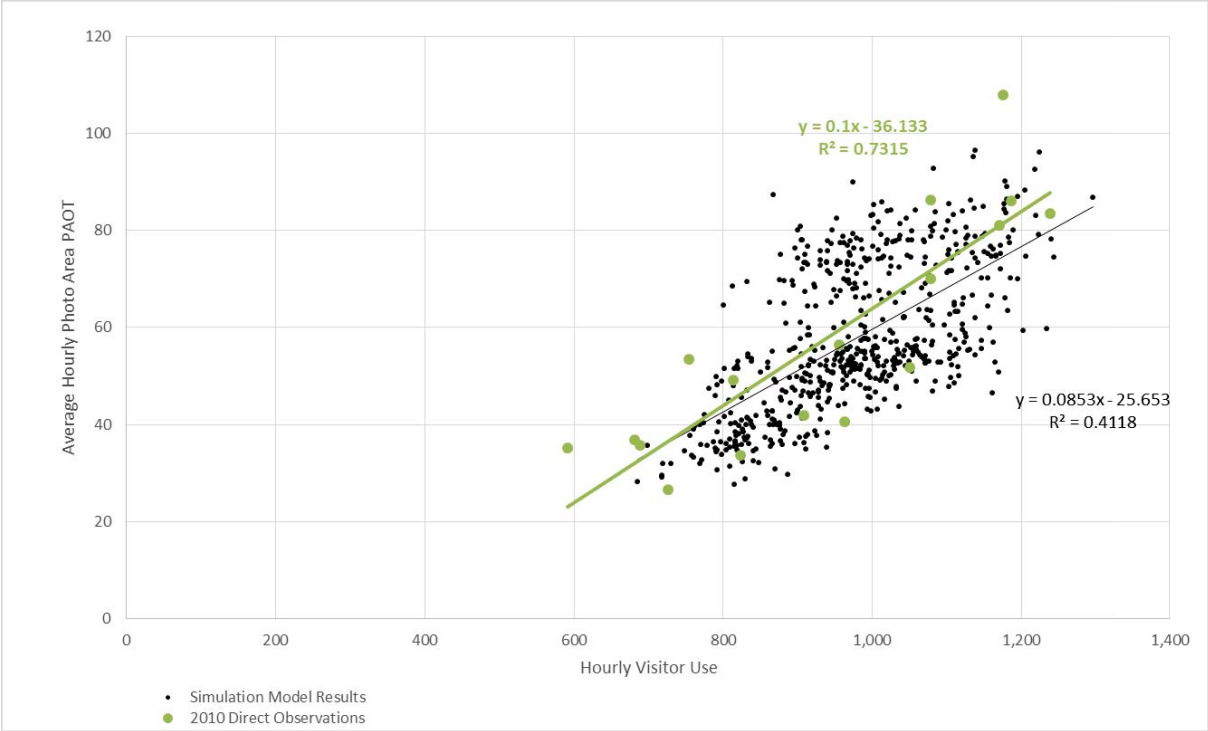
Example relationship: Hourly photo polygon vs. area use for Yosemite Falls

Research established relationships between the number of people in photo evaluations (in this case, the viewing platform) and the hourly number of people in the area, as illustrated in Figure S-5 for Yosemite Falls (Resources Systems Group, Inc 2014). The figure shows that simulations (the black dots) describe a relationship similar to direct observations (green dots) conducted onsite during the original study, validating the model and allowing use of more robust statistics from modeling. The relationships can be described by regression equations and associated statistics, as shown below. The high R^2 values show that use densities on the viewing platform are strongly related to total use in the area over short time periods. This illustrates one of the links in the spatial "translation" chart above. Similar relationships were developed for other locations; summary statistics are given as each is discussed, and additional details are available in Resources Systems Group, Inc (RSG) (2014).

Direct observations: Hourly photo PAOT = 0.1 (Hourly visitation to Yosemite Falls) + 36.1, R^2= 0.73

Simulation model: Hourly photo PAOT = 0.09 (Hourly visitation to Yosemite Falls) – 25.7, R^2=.41

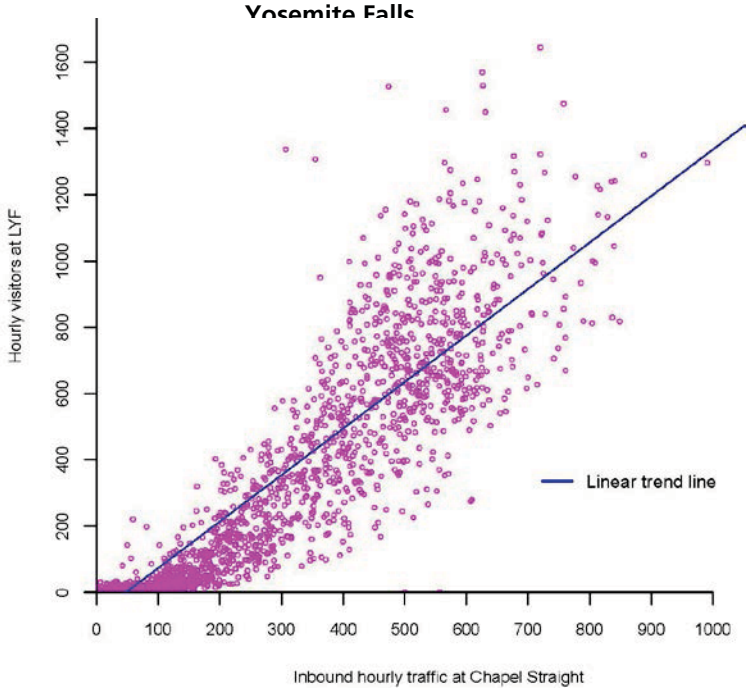
Figure S-5: Hourly Area Use vs. Hourly PAOT on Yosemite Falls Platform



Example Relationship: Hourly Area Use vs. East Valley Use for Yosemite Falls

Research established relationships between the hourly number of people in a location and the hourly number of vehicles arriving in East Valley (past the counter at Chapel Straight), as illustrated in Figure S-6 for Yosemite Falls (RSG 2014). The relationships were developed as part of multiple regression models that include several other variables affecting the relationship (e.g., month of year, day of week, time of day, holidays, and a lag in peak timing). Statistics for the "best fit" model include standardized and estimated coefficients, *p*-values, and R^2, which in this example was 0.92. The high R^2 value shows that use densities at a location are highly correlated with vehicles entering East Valley, another link in the spatial "translation" chart above. It also verifies that this relationship holds throughout the day, allowing "translations" between AOT

Figure S-6: Hourly area use vs. East Valley use for Yosemite Falls



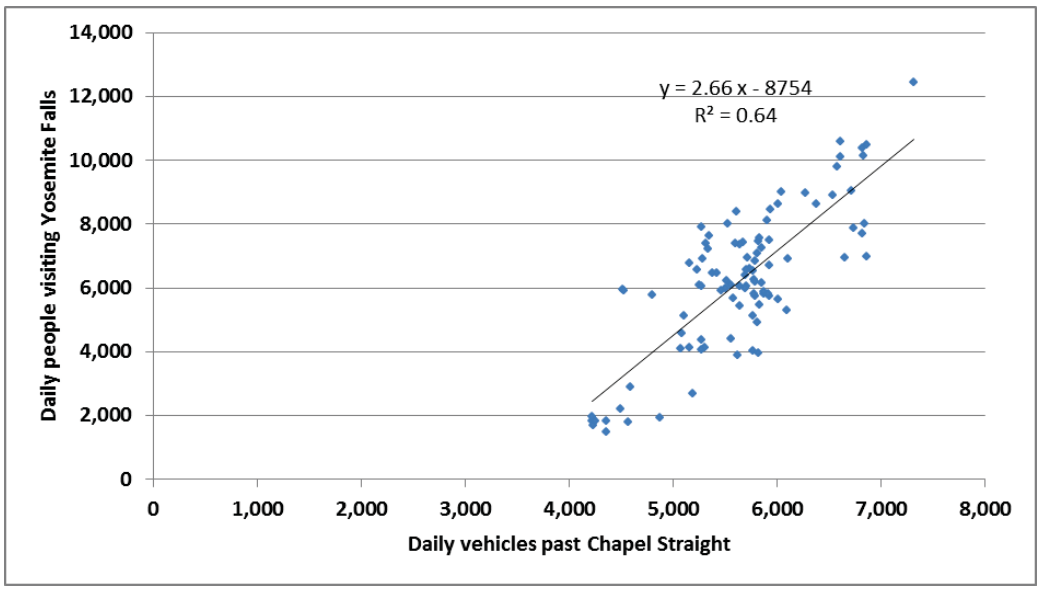
and daily use levels. Similar relationships were developed for other locations; summary statistics are given as each is discussed, and additional details are available in RSG (2014).

Example relationship: Daily Area Use vs. East Valley Use for Yosemite Falls

Research also examined relationships between daily number of people in a location and daily number of vehicles arriving in East Valley (past the counter at Chapel Straight), as illustrated in Figure S-7 for Yosemite Falls in 2010 (RSG 2014). These are simpler relationships that do not include mediating variables, but high R^2 values for some locations indicate that daily use into the Valley predicts daily use at those locations. At other locations with smaller effects, managing total use would be a less effective way to manage densities at the site. Individual sites are discussed below; additional details are available in RSG (2014).

Direct observations: Daily visitation to Yosemite Falls = 2.66 (Daily vehicles past Chapel) – 8,754, R^2= 0.64

Figure S-7: Daily Area Use vs. East Valley Vehicles for Yosemite Falls, 2011



Other Assumptions Used in Modeling

Several spreadsheet models were developed to associate different use metrics with specific infrastructure options, particularly those associated with overnight use and parking. Several assumptions and protocols were used in the models. Information about those assumptions, protocols, and their bases are listed below:

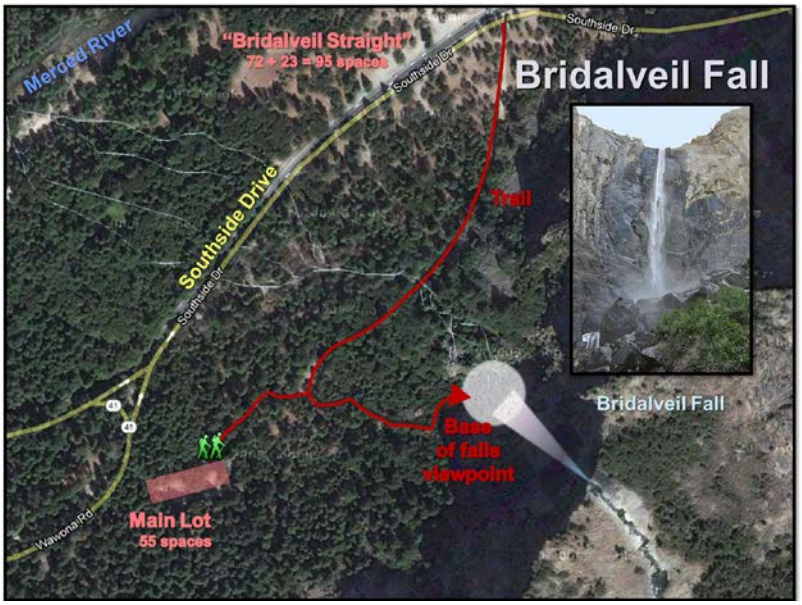
- **Number of people per lodging unit**. This varies by unit configurations (the number and sizes of beds) provided by the concessioner, and professional estimates of the percent of nights those would be filled, which varied by lodging location. A single average number of people per unit was used for each location: 2.2 people per unit at the Ahwahnee, 2.9 for Yosemite Lodge, 3.0 for Curry Village, and 4.4 for Housekeeping. New units proposed in any alternative would maintain these ratios.
- **Number of people per camping site.** This varied by site type and location based on information from campground staff. Different averages were used for each location; they ranged from 4.0 people per site (Backpackers walk-in camp) to 4.7 people per site (Lower Pines), with higher estimates for proposed group sites (e.g., 22 people per site for Upper River group sites in Alternatives 4, 5, and 6).

- **Number of vehicles per unit.** These estimates varied by type of lodging, and ranged from 1.4 to 3.2 vehicles per unit.
- **Proportion of visitors who arrive by transit or tour bus rather than private vehicle**. These varied by lodging location (e.g. 5% at the Ahwahnee to 15% percent at Yosemite Lodge and Curry Village).

Bridalveil Fall

Bridalveil Fall is a major attraction in West Valley (Figure S-8). Fifty-two percent of all visitors go to this attraction (Blotcamp et al. 2010), although some may view it from roadside turnouts rather than trails or the viewing platform. There are approximately 55 parking spaces in an off-road parking lot accessed from Wawona Road near the junction with Southside Drive, with an additional 95 roadside spaces along Bridalveil Straight. A trail connects the two parking areas, with a spur to the base of the falls and the small viewing platform (390 square feet).

Figure S-8: Map of Bridalveil Fall Vicinity



Evaluations and Use-Condition Relationships

- Research examined evaluations on a segment of trail and at the falls viewing platform; the platform reaches unacceptable densities at much lower use and is thus the "limiting factor" social condition for the area.
- Densities were measured in square feet per person at the main viewing area (which does not include people off the pavement among the rocks at lower water times). The platform is 390 square feet.
- NPS set standards based primarily on photo evaluations assessed in the 1999 Manning et al. study. Future monitoring will focus on densities at the existing platform but can be transferred to any redesigned platform(s).
- Use – condition relationships were assessed for a baseline year, 2011. Peak 14 day period was June 20-July 3 with daily use levels between 4,500 and 6,200 per day. The peak 6-hour period was 10-4, with a range of 470 to 610 visits per hour (RSG 2014).

- Model validation: simulation results are comparable to direct observations (RSG 2014). The relationship of average hourly use in photo polygon to average hourly use in the area is best described by the modeled equation, which has an R^2=.70.

  People per hour in photo polygon = .085 (people per hour in area) – 8.46

- Hourly use in the area is highly correlated with hourly vehicles into East Valley; R^2 is 0.94 for the baseline year of 2011 (RSG 2014).

- The relationship between daily trail use and overall Valley use (vehicles per day past the counter at the Chapel on Southside Drive) is the strongest of any location in the Valley (R^2 = .64 in 2007 and .88 in 2011). Because Bridalveil is close to the road, distant from overnight facilities, and many day-visitors stop here (43%, the highest proportion of the three falls), traffic counts have the greatest impact on use levels at this site. However, as with each of the falls, day of the week, weather, and flows also affect visitation.

- For the the baseline year of 2011:

  Estimated daily people to Bridalveil Falls = 1.09 (Daily vehicles past Chapel) – 2,203

- Estimated daily use at Bridalveil (based on capacities and daily inbound traffic past Chapel) and viewing platform densities for the lowest use, preferred, and highest use alternatives are given below (RSG 2014):

  Alternative 3: 3,200 visitors and 17 square feet per person

  Alternative 5: 4,708 visitors and 11 square feet per person

  Alternative 6: 5,228 visitors and 10 square feet per person

Implications for Alternatives and Capacities

Density evaluations, daily visitation modeling, and recent visitor counts indicate that "acceptable" density standards (about 20 PAOT and 20 square feet per person) are consistently exceeded on many days in a typical summer, and the peak 14 day average (during the 6 hour peak) is about 35 PAOT and 11 square feet per person. "Translations" indicate that even daily location use levels of 3,200 (Alternative 3 estimate) will slightly exceed the acceptability standard, and this equates to about 5,000 vehicles entering East Valley per day (many less than current peak use days). With Alternatives 5 and 6, if no site changes are made, densities at the viewing platform would be higher than "displacement" levels for most of the day (RSG 2014).

These results confirm well-known problems with crowding and congestion at the small Bridalveil viewing platform, providing impetus for a major redesign of parking, circulation, trails, and viewing areas in all alternatives. These changes, along with capacities in each alternative, are predicted to substantially alleviate problems at this site.

The preferred alternative includes a West Valley shuttle loop to better distribute use temporally through the day (many in private vehicles visit this site around midday as they enter the Valley on Southside Drive; it is more difficult to access on the way out). Considerations in the redesign may also include:

- Two or more viewing platforms to maintain this site's "intimate" experiences, even during higher use high flow periods when mist affects access closer to the falls.
- Loop trails from all parking areas to all viewing platforms to distribute use spatially.
- A shorter loop and viewing area for less ambitious hikers or higher-mist times.
- Appropriate number and location of parking spaces for the capacity of trails and platforms.

- Keep shuttle bus stops (and tour bus parking) far enough from viewing platforms to prevent "pulses" of visitors from overwhelming the platforms.
- More frequent but smaller shuttles to minimize pulses of visitors.

Vernal Falls

The trail to Vernal Falls is a major hiking attraction in East Valley (Figure S-9), following the Merced River from Happy Isles (and continuing on to Nevada Falls upstream). The falls run all year, but with lower flows later in the summer. Twenty-eight percent of all visitors go to this attraction (Blotcamp et al, 2010); it is probably the highest-use hiking trail outside the developed area in East Valley. The trail is accessible by walking from Curry Village, the Ahwahnee, or East Valley campgrounds, or by shuttles to Happy Isles (no trailhead parking for private vehicles).

Figure S-9: Map of Vernal Falls Vicinity

Evaluations and Use-Condition Relationships

- Research examined evaluations on a trail section .25 miles up the paved trail to the falls.
- Densities were measured in square feet per person for a 130 foot length of trail that is about 860 square feet.
- Standards were based primarily on photo evaluations assessed in the 1999 Manning et al. study.

- For the baseline year (2011), the peak 14 day period was May 18 to June 2 with use levels of 1,800 to 5,900 people per day. The 6-hour peak period was 10 am-4pm, with use levels of 390 to 500 people per hour (RSG 2014).
- Model validation: simulation results are comparable to direct observations (RSG 2014). The relationship of average hourly use in photo polygon to average hourly use in the area is best described by the direct observations model, which has an R^2=.06.
- People per hour in photo polygon = .0086 (people per hour in area) + 6.7
- The relationships between daily trail use and overall Yosemite Valley use (vehicles per day past the counter at the Chapel on Southside Drive) are weaker than Bridalveil and Yosemite Falls (R^2 = .09 in 2011). As with the other two falls, day of the week, weather, and flows affect visitation, but for Vernal Falls distance from the road, parking, and overnight facilities mean that traffic counts have the least impact on use levels at this site. Only about 10% of day users hike to this site.
- For the the baseline year of 2011 (RSG 2014):

  Estimated daily people to Vernal Falls = 0.320 (Daily vehicles past Chapel) + 881
- Estimated daily use on trail to Vernal Falls (based on capacities and daily inbound traffic past Chapel) and viewing platform densities for the lowest use, preferred, and highest use alternative are given below (RSG 2014):

  Alternative 3: 2,559 visitors and 112 square feet per person

  Alternative 5: 3,765 visitors and 76 square feet per person

  Alternative 6: 4,182 visitors and 69 square feet per person

Implications for Alternatives and Capacities

Density evaluations, daily visitation modeling, and recent visitor counts indicate that "acceptable" density standards (about 26 PAOT and 33 square feet per person) are rarely exceeded in a typical summer, and the current peak 14 day average during the 6 hour peak is about 11 PAOT and 80 square feet per person (close to the "preference" evaluation level at 80 square feet per person). "Translations" indicate that even daily location use levels over 5,000 would not exceed the acceptability standard, and this translates to nearly 13,000 vehicles into East Valley (which is about twice current high use days and not projected in any alternative).

These results confirm there are few crowding or congestion problems on the Vernal Falls trail, and it is not the limiting factor for capacity in East Valley. Only rare days had use levels greater than acceptability evaluations, and some of the highest days involved unusual circumstances (e.g., when the trail re-opened after a two-day search-and-rescue).

Yosemite Falls

Yosemite Falls (Figure S-10) is probably the most popular attraction in Yosemite Valley and the park (59% of all visitors; Blotcamp et al. 2010). Unlike Bridalveil and Vernal Falls, Yosemite Falls typically dries up in late summer or early fall, and use decreases dramatically. Accessible by a loop trail from Yosemite Village (.6 miles) and Yosemite Lodge (.4 miles), the closest day use parking is at Camp 6 (.9 miles) and the closest shuttle stop is 0.4 miles.

Figure S-10: Map and Photos of Yosemite Falls

Evaluations and Use-Condition Relationships

Research examined evaluations on a trail section and at the falls viewing platform; the latter reaches unacceptable levels at much lower use and is thus the "limiting factor" social condition for the area.

- Densities were measured in square feet per person at the main viewing platform (1,225 square feet, does not include people off the pavement among the rocks at lower water times).
- Standards were based primarily on photo evaluations in the 1998 Manning et al. study, with adjustments due to a redesign of the platform in 2005. Future monitoring focuses on densities at the redesigned main platform, monitored from a camera that works in multiple lighting conditions.
- Baseline year was 2010, peak 14 day period was June 26-July 9 with use levels of 6,700 to 10,300 people per day. The 6-hour peak period was 11am-5pm, with use levels of 850 to 1,100 people per hour (RSG 2014).
- Model validation: simulation results are comparable to direct observations. The relationship of average hourly use in photo polygon to average hourly use in the area is best described by the simulated model equation, which has an R^2=.41:
- People per hour in photo polygon = .085 (people per hour in area) – 25.7
- Hourly use in the area is highly correlated with hourly vehicles entering East Valley (R^2 = 0.91).
- Relationships between daily Yosemite Falls trail use and overall Yosemite Valley use (vehicles per day passing the counter at the Chapel on Southside Drive) are strong (R^2 was .34 in 2007, .64 in 2010, and .64 in the first half of 2011). As with the other two falls, day of the week, weather, and flows affect visitation, and relationships are stronger during the first half of the summer when the

falls has higher flows. About 35% of all day users visit Yosemite Falls (higher than Vernal Falls but lower than Bridalveil).

- For the the baseline year of 2011 (RSG 2014):

  Estimated daily people to Yosemite Falls = 2.66 (Daily vehicles past Chapel) – 8,754

- Estimated daily use to platform at Yosemite Falls (based on capacities and daily inbound traffic past Chapel) and viewing platform densities for the lowest use, preferred, and highest use alternative are given below (RSG 2014):

  Alternative 3: 5,713 visitors and 49 square feet per person

  Alternative 5: 8,405 visitors and 33 square feet per person

  Alternative 6: 9,335 visitors and 30 square feet per person

Implications for Alternatives and Capacities

Density evaluations, daily visitation modeling, and recent visitor counts indicate that "acceptable" density standards (about 61 PAOT and 20 square feet per person) are occasionally exceeded on high use days. However, the current peak 14 day average (during the 6-hour daily peak) provides better-than-acceptable conditions of about 35 PAOT and 35 square feet per person. "Translations" indicate that location use levels exceeding 9,335 people per day (about 6,800 vehicles entering East Valley per day) will not exceed the acceptability standard over a 14 day/6 hour peak period average, although there may be higher densities for some parts of the day.

These results confirm that crowding and congestion can occur at Yosemite Falls for a few hours on peak use days under existing conditions. Capacities in MRP action alternatives would cut off the "peaks" and fill in some lower use "valleys," generally providing better than acceptable conditions. The increased camping use in the preferred alternative may also produce a wider temporal distribution of use, which will further lower peak use.

Under unusual circumstances (e.g., fine weather over Memorial Day weekend with peak flows over the Falls while Tioga Pass and Glacier Point roads are snowed in), daily use at Yosemite Falls may exceed 10,000 visitors and produce periods of higher-than-acceptable densities. If monitoring shows these issues, NPS will develop a more active education program to distribute use temporally or spatially.

Higher Use Beaches

Relaxing, swimming, boating, and hiking are popular river-related activities that on several East Valley beaches, and visitor densities can be an important component of the quality of those experiences. The MRP proposes monitoring densities at two higher use beaches: 1) the main beach upstream from the Housekeeping Footbridge (river right or North side); and 2) the beach upstream from Swinging Bridge (river right or north side).

Evaluations and Use-Condition Relationships

- Research examined densities for a generic beach (a section of Housekeeping Beach was used in the photos) to develop evaluations for preference, acceptable, and displacement levels.
- The study showed 10, 30, 60, and 100 people at one time in the photos; these were converted into densities for the photo area (4,800 square feet, which assumes a "beachfront" width of 50 feet, extending 25 feet up the sand and 25 out into the water).

- Evaluations were based on people AOT photos in the 2011 study. The Housekeeping and Swinging Bridge monitoring polygons may be adjusted annually based on beach condition and flows (to capture the main beach being used).
- Relationships between densities at East Valley beaches and overall Yosemite Valley use (vehicles per day passing the counter at the Chapel on Southside Drive) are low, similar to Vernal Falls, (R^2=0.05 to 0.10 for Swinging Bridge and Housekeeping East Beaches). Most beach users (57%) are overnight visitors, so changes in day use have less effect on these densities.

Implications for Alternatives and Capacities

Density evaluations from the 2011 study and recent visitor counts indicate that only a few high use beaches had even a few days with densities greater than "acceptable" levels, and many were closer to "preference" levels. As with Vernal Falls, densities at these beaches are not the limiting factor for Valley-wide capacities, even in the highest use alternative.

The preferred alternative includes increases in campground use close to Housekeeping Beach, so monitoring is needed to see if that will substantially increase densities there. If densities approach standards, the most effective "fix" will be education that encourages visitors to distribute themselves temporally (avoiding the peak use times) or spatially (there are several lower-use beaches within a few hundred feet of Housekeeping Beach).

Boating Reaches

Boating currently occurs on a 2.4 mile reach of the Merced River in Yosemite Valley (from Stoneman Bridge to Sentinel Beach), and includes limits on commercial boating levels. The MRP considered changing commercial and private use on this reach, and opening new segments to boating. Capacities for the currently used reach considered data from the 2011 river study, while capacities for new boating segments were based on logical assumptions about encounters, impacts such as portage trails, and/or facility limitations at access areas. Details are in Appendix R: Boating Opportunities. The example presented here is for the currently used higher-density reach in East Yosemite Valley.

Evaluations and Use-Condition Relationships

- Research examined densities for a generic boating reach (a view upstream from Swinging Bridge was used in the photos) to develop evaluations for preference, acceptable, and displacement levels.
- The study depicted 4, 8, 16, and 24 boats at one time in the photos; these were converted into densities for the photo area (about 500 linear feet).
- Evaluations were based on boats AOT photos in the 2011 study, translated into densities to fit with future monitoring protocols.
- Daily commercial boating use will be monitored by reports from the concessioner, while BAOT will be assessed by camera-based counts. If total use approaches capacities, private users will be required to register and a limitation system may be needed to enforce capacities.
- Relationships between boating use (boaters per day between Stoneman Bridge and Sentinel Beach) and overall Yosemite Valley use (vehicles per day passing the counter at the Chapel on Southside Drive) are moderate for commercial boating users (who are more likely to be day users). As with East Valley beaches, existing boating densities have been compared to "acceptability" and "preference" evaluations (Whittaker and Shelby 2012).

- Using all this information, NPS predicted boating densities for each MRP alternative. Existing densities on high use days rarely exceed acceptability evaluations (about 14 boats at one time), and often meet preferences (about 6 boats at one time).

Implications for Alternatives and Capacities

For this high use segment, the preferred alternative reduces total boating to ensure that acceptability standards are not exceeded on even high use days. This is accomplished through reducing commercial use (about 25% fewer boats per day) while expecting private use to remain near existing averages. This would reduce the number of BAOT in view sheds and congestion at launch areas and beaches, providing lower density experiences for boaters and shore users

The preferred alternative also reduces the commercial rafting footprint. The rafting center at Curry Village will be replaced by truck-based mobile rafting operations, with a put-in near the durable gravel beach on the upstream end of Housekeeping East Beach (see Appendix R: Boating Opportunities for details). Because boating capacities are managed directly (by limiting amount and location of commercial use), boating capacities are not a limiting factor for larger Valley capacities.

Lower Use Areas

Standards and monitoring protocols were developed to represent other lower use beaches and hiking trails in both East and West Valley. Candidate locations include Slaughter House Meadow, El Capitan Beach, and Superintendent's Beaches, and will be identified in mid-summer each year after consideration of beach and flow conditions. The observed densities at three low-use beaches will be averaged to compare to the standard.

Based on the 2011 river use study, use at such sites is low and sporadic, typically one to two small groups at a time. Use levels are not well-correlated with overall Valley use levels, depending more on proximity to campgrounds or the opportunistic behavior of small user groups (Whittaker and Shelby 2012). Higher use alternatives do not include access or infrastructure that would increase use in these areas, and use at these sites is not a limiting factor for overall Valley capacities.

Overall Conclusions about Social Conditions in Yosemite Valley

Taken together, social indicators and standards define "how much is too much" at several attractions in Yosemite Valley, and these are likely to be "limiting factors" among ORV-related values. With known relationships between use and these impacts, NPS designed MRP alternatives with user capacities that provide for a range of densities and types of experiences.

User capacity tradeoffs in Yosemite Valley are between the amount of use, infrastructure (especially lodging, campgrounds, and day use parking lots) and social conditions (densities at attraction sites, roadway travel times, and parking availability). There are also tradeoffs between meadow and riparian restoration and levels of infrastructure or facilities. Examples include:

- In the lower use alternatives, densities at attractions are closer to "preference evaluations" than "acceptability" evaluations. Higher use alternatives allow more access, but conditions may be less desirable (though still within the acceptable range).

- Alternative 2 eliminates the Lodge and Housekeeping as overnight destinations. This allows greater restoration, but reduces the number of people who can stay overnight in those types of lodging. It also changes the type of use in those areas to lower density day use.
- Overnight vs. day use. More parking or development for one generally means less for the other (holding developed area constant). The largest contrasts are between Alternatives 2 (much lower overnight use, but higher day use) and 6 (higher overnight use, roughly static day use).

Merced Gorge and El Portal: Segments 3 and 4

These two river segments (Segments 3 & 4) have capacities for day, overnight, and administrative use as detailed in Chapter 6 of the MRP. They are distinct from the Wilderness/backcountry and Yosemite Valley segments because most visitors "pass through" them on the way to the Valley or other parts of the park. The recreation experience in these segments is related to scenic driving for most visitors, although some make short stops at scenic turnouts, and a few make longer stops to hike, climb canyon walls, or scramble to the river to swim, fish, or relax along the river (especially in mid-to-late summer).

NPS identified acceptable infrastructure levels (the existing roadway, the appropriately spaced turnouts and parking areas, and entrance gate facilities), and then identified use levels that fit with those facilities without unacceptable congestion or other impacts on river values. The capacities assume other management actions address site-specific impacts (e.g., parking and trail designs that funnel visitors to resilient areas and discourage use in sensitive areas).

Two transportation analyses informed user capacity decisions in these segments. The first focused on parking availability and congestion at the existing turnouts. Parking inventories identified the number of spaces, and assumed 90% of spaces can be used at one time (the same occupancy standard used in Yosemite Valley). The second analysis focused on traffic conditions. Applying information from more complex traffic modeling in Yosemite Valley, traffic levels of about 20 vehicles per mile would provide "free flow" conditions important for high quality scenic driving experiences. Given the proportion of total Park use that passes through these segments, even the highest use alternatives in the MRP do not approach capacities (DEA 2012).

Capacity-related management actions common to all alternatives included parking space marking at specific turnouts to improve parking efficiency, and site redesign at a few locations where informal use of trails to the river has eroded banks. In these segments the river is typically a dynamic, boulder-strewn channel and riparian zone that is resistant to visitor trampling.

Wawona: Segments 6 and 7

As with Merced Gorge and El Portal, this segment has considerable "pass through" use, so capacities are largely designed to ensure free-flow traffic circulation and parking availability. But Wawona also has a campground, overnight lodging, and private land largely occupied by NPS and concessioner employees; these areas required additional capacity considerations.

Capacity analyses identified potentially affected ORVs, including a riparian plant species (Sierra sweet bay) and cultural resources associated with the historic A.E. Wood U.S. Army camp. Protection options included site-specific restoration (e.g. removing some campsites in Wawona Campground in several alternatives)

with implications for overnight capacities. Facility analyses also led NPS to retain Wawona campground and the historic Wawona Hotel, which further defined overnight use and constrained other uses.

Many of the recreation-related issues in Yosemite Valley are relevant in Wawona (although recreation was not an ORV). Applying similar circulation and parking availability analyses, NPS estimated capacities based on traffic flow and parking availability. The analysis also considered location and spacing of parking to provide access to attractions or facilities while protecting sensitive areas. Day-use capacity was also integrated with regional transit along Highway 41, tour bus use, and shuttle options between Wawona, the South Entrance, and Mariposa Grove.

Based on the proportion of total Park use that passes through Wawona, even the highest use alternatives in the MRP do not approach capacities in this segment (DEA 2012). Constraints are added by numbers that can "stop and stay" in Wawona at one time without unacceptable congestion. Management actions common to all alternatives included marking at specific turnouts to improve parking efficiency, and site redesign at a few locations where informal trail use has eroded river banks. Fencing and signs will also be developed to delineate parking areas and guide use to resilient areas.

Valley Transportation System

This final section describes how capacities were integrated with transportation considerations. Efficient transportation systems are an important component of high-quality recreation in the Merced River corridor, particularly in Yosemite Valley. The transportation system, including roads, parking, and transit, is the primary means of access to the river corridor for most visitors, and crowding, congestion, or delays directly affect an individual's ability to recreate. Scenic driving is also the second most common recreation activity reported by Yosemite summer visitors (64%), and transportation decisions affect the quality of that activity.

Peak season visitors to Yosemite Valley know first-hand that use levels can affect the quality of their experiences in the park. The sheer volumes of vehicles and people sometimes produce long lines at entrance gates, traffic jams at intersections, full parking lots, and congested trails or viewpoints. These problems have been challenging the park's infrastructure and operational staff for decades, but more frequently in recent years (White et al. 2012). A 2011 study of river users in Yosemite Valley, although it represented only a subset of visitors to the Valley, helped quantify the general problem: 82% report feeling some degree of crowding during their visits (Whittaker and Shelby 2012). Meta-analyses of the hundreds of studies using this same crowding measure suggest that recreation settings with levels above 65% may be "over capacity," and those above 80% may be "greatly over capacity" (Shelby et al. 1989; Vaske and Shelby 2008).

More detailed information from the 2012 study showed that river users feel more crowded while using the park's transportation system than when participating in other activities. The percent feeling crowded while driving roads (90%), finding parking (88%), or riding free shuttles (83%) were highest, followed by hiking or biking on trails (68%). In contrast, crowding ratings for river-based activities were considerably lower: boating (60%), relaxing (54%), or swimming (45%). These are considered to be in "high normal" (50-65%) or "low normal" (35-50%) ranges (Shelby et al., 1989). Although these general crowding ratings by themselves are insufficient to determine capacities, they provide perspective in relation to other studies, allow comparisons among areas within Yosemite, and show that transportation conditions affect overall perceptions, as anticipated by a conceptual model developed in Meldrum and DeGroot (2012).

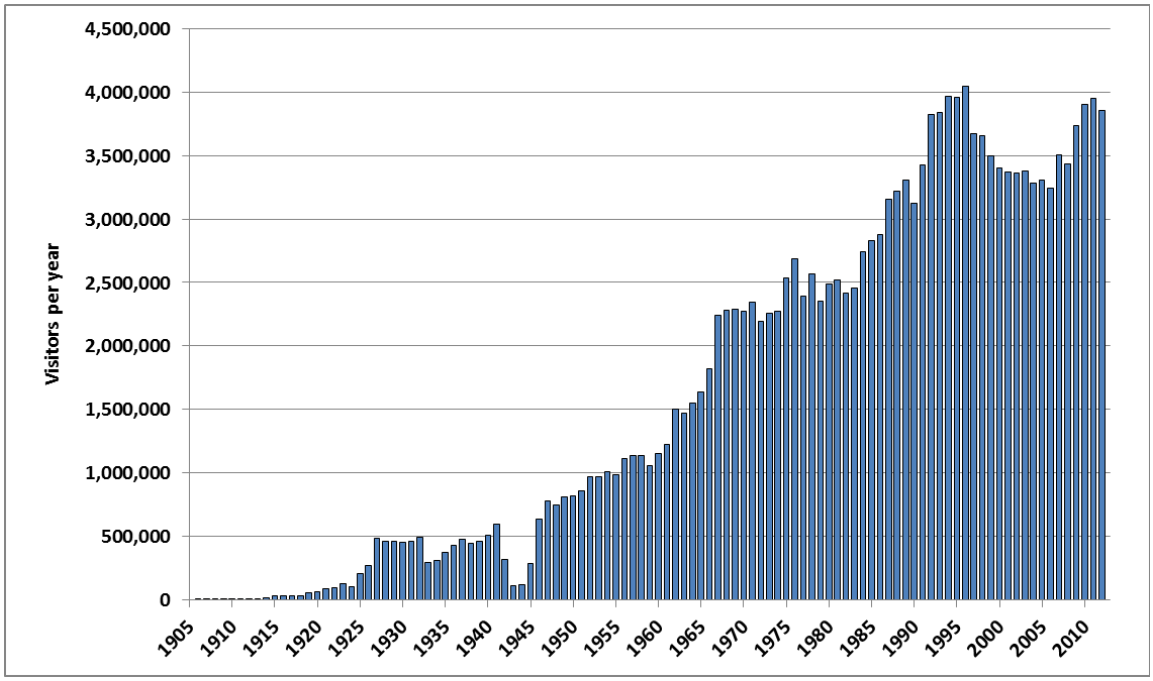
Transportation planning was integrated into overall planning and capacity decision-making through two types of analyses. First, NPS ***analyzed past and current use levels*** to identify problems in the current transportation system. Second, NPS ***modeled potential transportation changes*** to predict how different transportation infrastructure options would handle the capacities in different alternatives. Illustrative findings from these analyses are described below.

Past and Existing Use

The Long-Term Trend of Increasing Use

NPS has been reporting annual use levels in Yosemite since 1906, when just over 5,000 visitors came to the park. Since 1990, that number has often been close to 4 million per year. Although use varies in any given year due to weather, fires, or other circumstances, use has increased over the period of record at an average rate of 3.45% or 33,000 visitors per year (Figure S-11). This inexorable increase in use reflects the rate of population growth in the country and California during the same period, and suggests that Yosemite use levels will continue to rise in the future unless use is capped. Capacity planning assumes that any capacity will be reached at some point in the future, so all systems, including transportation, need to handle that use level.

Figure S-11: Annual Recreation Visits to Yosemite, 1906-2012



Recent Use Trends: More Days with High Use, Relatively Static Peak Use

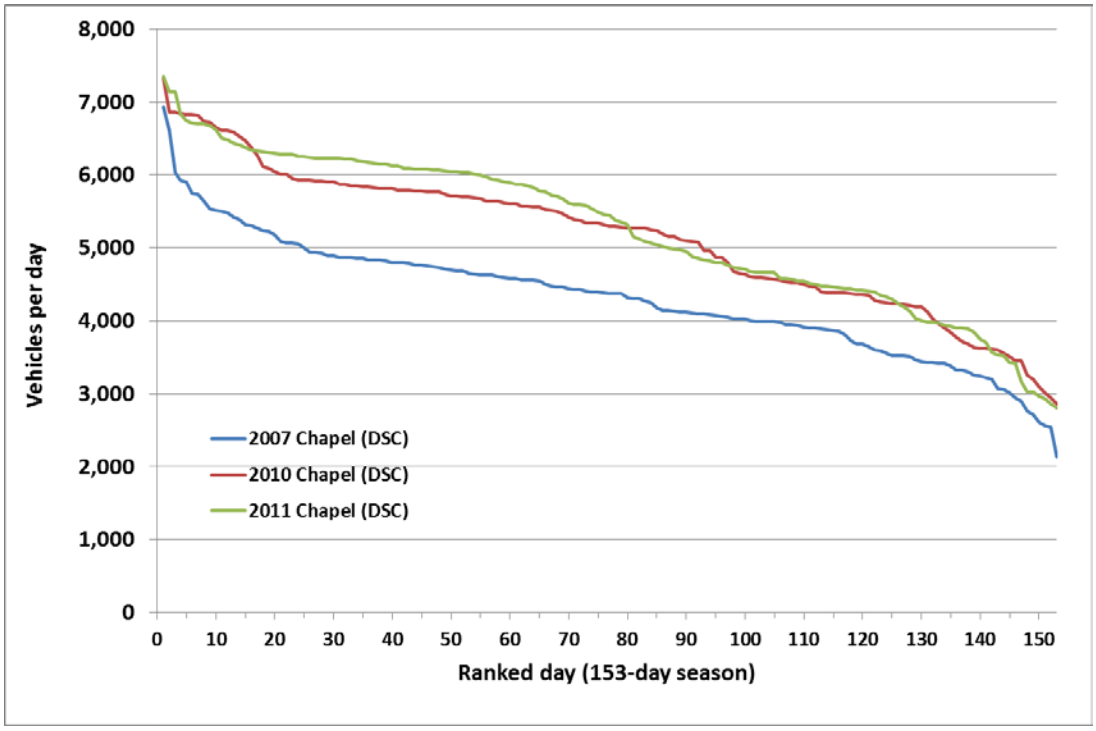
Analysis of more specific information about Yosemite Valley provided other findings. Figure S-12 arrays daily vehicle counts at the Chapel counter on Southside Drive (a measure of East Valley use) from highest to lowest for several recent years. It shows that the highest use days (about 7,000 vehicles per day) were similar in each year, but the number of days at high levels (e.g., over 6,000 vehicles per day) has increased in recent

years. Stated differently, average or median visitation has increased more than the number of visitors on the peak day of the season (DEA, 2012).

Several factors can affect use levels in any given year. Since 2009, potential influences on Yosemite Valley use levels have included:

- high water and large waterfall volumes attracted use
- large snow packs delayed access to Tioga Pass and Glacier Point and concentrated use in the Valley
- short term weather events (snow or rain storms) discouraged use
- fires closed roads or created hazy conditions that discouraged use
- rock fall events closed cabins at Curry Village and parking areas at the Ahwahnee
- Curry Village hanta-virus cases closed cabins
- Media attention can accentuate any of these impacts. In developing capacities, NPS recognized that transportation systems had to accommodate the increasingly frequent high use days described above.

Figure S-12: Daily vehicles into East Valley in recent years, arrayed from highest to lowest for each year.



Factors that Artificially Limit Use Under Current Management

Traffic data from the Chapel counter (East Valley vehicles per day) suggest that the highest use days appear to reach a "ceiling" at about 7,000 vehicles per day. Reasoned analysis suggested that a combination of existing infrastructure, management actions, and conditions may artificially constrain use at about this level. The factors in play include:

- Parking spaces fill.
- Space for vehicles on roads becomes limited.
- Cars slow to search for scarce parking or due to roadside parking "friction."
- Pedestrian crossings (which impede traffic) increase due to roadside parking and the volume of visitation.
- Intersections cause queue lengths and travel times to approach "exponential" levels.
- NPS may institute the "shunt," a de facto first-come/first-served onsite limit.
- Some vehicles "turn back" either in-valley or at entrance gates as they recognize congested conditions.
- The system approaches gridlock.

Transportation elements in the MRP alternatives were designed to address these problems. If transportation improvements (e.g., new parking, improved intersections) were implemented without capacities, higher use could probably occur at a new "apparent natural ceiling." But this higher use would affect other conditions (e.g., congestion at attraction sites, river beaches, shuttles), which would become limiting factors. MRP alternatives included transportation systems designed to handle the number of vehicles allowed by the capacity, thereby avoiding conditions approaching gridlock.

Transportation Modeling

Transportation planning in the MRP process modeled existing and potential new transportation systems at different use levels. These analyses were helpful to overall MRP planning by:

- Focusing on available use metrics. Modeling required consideration of several use level metrics (with units, location, and timing specified); the most useful assessed vehicles per day entering the East Valley and vehicle accumulations in East Valley.
- Focusing attention on explicit development "sideboards" (the extent of existing or new development) after considering legal, administrative, budget, and political realities.
- Identifying specific inputs (e.g., numbers and locations of parking spaces, numbers of visitors and vehicles in camping areas, etc.) needed to assess how different levels of infrastructure and use produce different transportation or capacity-related conditions. The modeling analyses encouraged NPS to update parking, camping, lodging, and employee/resident information. This resulted in improved inventories as well as improved assumptions about how many people use different parking, lodging, or camping configurations.
- Specifying assumptions about future use levels (peaks and averages) absent use limits. This helped identify the range of use levels to be explored in models, from current shoulder-season lows to higher-than-recent-year peaks.
- Clarifying areas available for new development or conversions from one type of development to another, after accounting for restoration initiatives or flood and rockfall hazards. Modeling requires information about where vehicles travel and park, which required specific assumptions about where new parking, camping, accommodations, and employee housing might be placed.
- Quantified metrics and tradeoffs. Modeling quantifies infrastructure (parking, intersections, accommodation units, employee housing units), use levels, and transportation conditions (e.g., travel times, length of traffic queues, percent of parking occupied, etc.), allowing exploration of specific impacts of hypothetical changes.

In general, transportation scenarios set infrastructure and use levels to provide output about resulting transportation conditions. However, one early model determined which use level would allow existing infrastructure to provide "acceptable" transportation conditions, and another estimated the highest use levels that might still provide acceptable conditions if infrastructure was enhanced. Modeling helped NPS understand the current situation, explore higher use scenarios, clarify the range of options, and assess impacts of plan alternatives.

Measuring Transportation System Performance

Two frequent questions from visitors are: "How long will it take to get there?" and, "Will parking be available?" Many visitors are acutely aware that congestion can affect their ability to experience the Valley, and NPS developed two indicators to assess transportation system performance during modeling: travel times on a key road segment (Curry Village to Camp 6) and day use parking availability. These are "limiting factors, and managing use levels to produce acceptable conditions as measured by these indicators also addresses issues in other parts of the transportation system (as shown by transportation models).

Travel time is measured as the time it takes to travel from the Curry Village 4-way stop to the Camp 6 stop sign on Northside Drive. Travel times are an indicator of circulation efficiency, which is a function of the number of vehicles, the amount of space on roadways, the number of intersections of different types, and the amount of "friction" caused by pedestrian crossings or vehicles blocking the roadway as they enter or leave roadside parking.

At "free flow" conditions this segment takes about five minutes, but transportation evaluation studies suggest that current visitors will accept somewhat slower travel times (White et al, 2010). To accomplish this "level of service" in higher use alternatives that include higher-than-current traffic volumes, transportation models determined the needed number of improved intersections, underpasses for pedestrians, and reductions in roadside parking.

Parking availability compared the number of vehicles that could accumulate in the East Valley with the number of parking spaces available under each alternative. The parking supply (number of parking spaces) varied by alternative as a result of interrelated decisions about amount of restoration, removal or repurposing of existing facilities, and amount of camping and lodging accommodation.

East Yosemite Valley currently has approximately 5,000 parking spaces, with about 4,000 available to visitors (the rest are in areas generally designated for administrative or employee/resident use). Modeling explored parking supply options ranging from 4,000 spaces (3,000 for visitors) to 6,500 spaces (5,500 for visitors). Urban transportation planners generally assume 85% of a parking supply can be utilized efficiently; parking filled at higher levels makes it difficult for drivers to find, enter, or leave spaces without creating bottlenecks. In East Yosemite Valley, where most visitor parking occurs in a few larger lots that can be managed more efficiently, 90% occupancy is assumed in all alternatives.

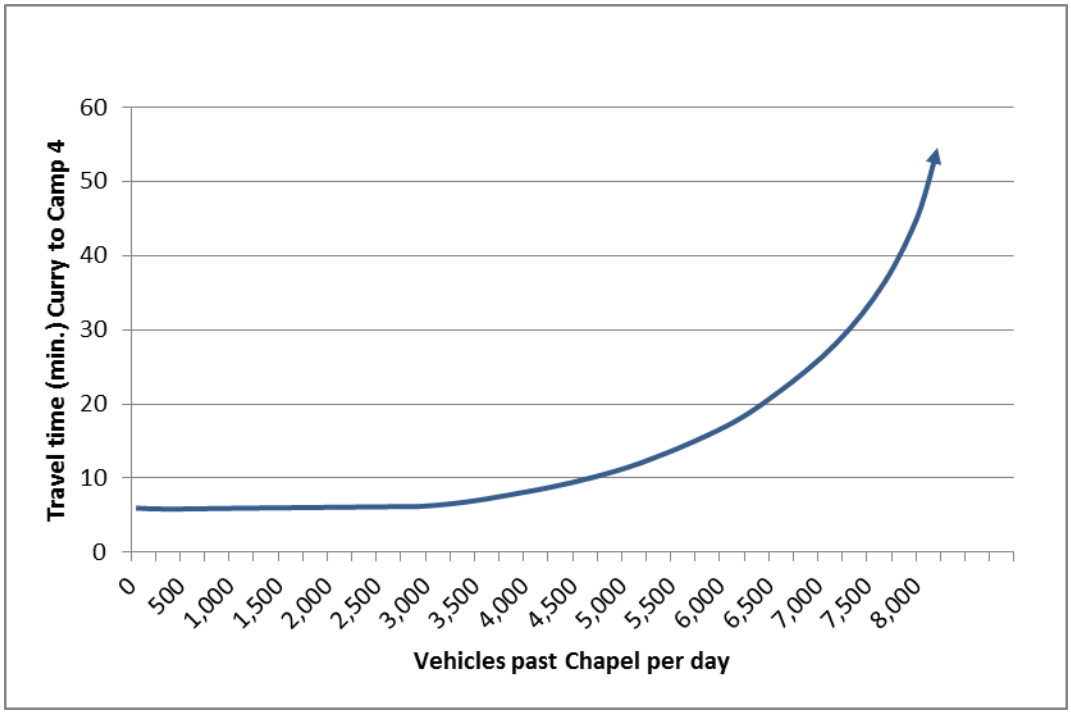
Exponential Impacts Occur When Use Nears a "Tipping Point"

Modeling showed that existing infrastructure in the East Valley creates several major "bottlenecks." In some cases this congestion is caused by lack of parking (vehicles clogging the roads in search of spaces), but in others it is caused by intersections or pedestrian crossings that cannot handle the volume of use. As these bottlenecks approach and exceed their design capacity, conditions such as travel times, queue lengths, and vehicles per road viewscape "go exponential" (increase at a dramatically increasing rate). Figure S-13

illustrates this notion conceptually, using rough findings from early scenario estimates of travel times on Northside Drive (DEA 2012). Before this level is reached, an intersection "works" (even if there is some congestion); at exponential conditions, the intersection or roadway "fails."

Modeling suggests that existing infrastructure has near exponential dysfunction at recent peak use levels, about 7,000 vehicles per day past the Chapel (DEA 2012). The primary bottlenecks in the current system appear to be 1) pedestrian crossings at Yosemite Lodge and Camp 6, and 2) the "two lane, two way" segment between Camp 6 and Camp 4 (which backs up intersections at Sentinel Drive and Camp 6, and contrasts with the two-lane, one way roads in the rest of the main circulation pattern). These bottlenecks generally occur for several hours during the afternoon. Given these bottlenecks, a general rule of thumb for improving East Valley circulation is to reduce traffic on the inbound side of the bottlenecks. To the extent that parking (especially day use parking that leaves *en masse* in late afternoon) can be located farther north and west, circulation would improve.

Figure S-13: Conceptual Relationship Between Use Levels and Travel Times (Given Existing Infrastructure)



Infrastructure Improvements Would Improve Circulation, but Have Tradeoffs

Modeling analyses showed that vehicle congestion at the Northside Drive/Sentinel Drive intersection contributes to congested conditions on Valley roads, but that relatively minor intersection improvements coupled with traffic-pedestrian separation accommodate current peak visitation levels and some amount of growth (DEA 2012). The major tradeoffs of such improvements include cost, acreage required for larger intersections, user acceptance of new traffic patterns/intersections (e.g. roundabouts), and potential cultural resource impacts from an underpass near Yosemite Lodge.

Tradeoffs of Providing Additional Parking

Use on peak days with the current transportation infrastructure produces vehicle accumulation in East Valley that "far exceeds the capacity of parking areas and the roadways, resulting in overflow parking and excess numbers of vehicles in queues on Valley roadways" (DEA 2012). In 2011, there were 66 days when the daily traffic volume exceeded the "practical parking supply" in East Valley. All plan alternatives were developed to match expected AOT vehicle levels with available parking, but they also recognized that simply increasing parking was problematic because of the space required.

A general transportation "rule of thumb" is about 115 parking spaces per acre of lot parking, so 5,000 existing parking spaces in East Yosemite Valley probably occupy about 45 acres. The MRP considered scenarios that would add as many as 1,500 spaces (about 13 more acres or 58 acres total), but recognized that such a build-out would decrease naturalness.

Parking lot design is also an important consideration. For example, square-like geometry may be more efficient, but "long and thin" lots may be easier to screen from visitors' viewscapes. More screening or shade may be better aesthetically (a condition) at the cost of fewer vehicles per acre (capacity).

Parking Efficiency was an Important Consideration

Efficiency refers to the ability of visitors to utilize available parking spaces. In order to increase capacities for a given amount of parking (e.g., 90% of spaces), MRP alternatives addressed parking efficiency issues related to 1) finding parking; 2) utilizing space in lots; and 3) minimizing overnight overflow use of day use lots.

Finding parking. Between-lot parking efficiency can be increased by improved ***"wayfinding"*** that helps visitors know where they want to go and how to find available parking spaces near that location (or near alternative transportation that can get them there). Centralized large parking lots are easier to find but may not be in close proximity to attractions or services. Dispersed lots may be more challenging to find, but are more convenient to attractions or services. ***"Parking information systems"*** (e.g., onsite electronic signage, smart phone applications) could also help visitors determine if parking spaces are available in a given lot, although these types of initiatives do not yet exist in Yosemite and were not assumed during planning.

Improved wayfinding and parking information systems also have tradeoffs. While potentially increasing parking efficiency and thus capacity, they increase "sign pollution" (an aesthetic consideration), may be costly, and are challenging to implement effectively (requiring research into how visitors seek and use information). Adding to these challenges, many Yosemite visitors are "first-timers," who may be more focused on the outstanding scenery while they travel, and may not have clear destinations in mind.

Within-lot efficiency (use of space once visitors have reached it) is another issue. NPS has increased ***directed parking*** in Camp 6 in recent years to address this problem. By encouraging more efficient use of available space (e.g., parking closer, separating RVs from other vehicles), staff have increased vehicle capacity to nearly 900 vehicles in a roughly 6 acre area (higher than the 690 total the 115 vehicles per acre "rule of thumb" would suggest). An obvious tradeoff is the operations cost. ***Paved lots with striping*** (or unpaved lots with rock or log parking designations) are another efficiency mechanism. MRP alternatives were designed assuming "reasonable" levels of traffic staffing rather than the "extraordinary measures" used in recent years.

Transportation modeling and monitoring also assessed ***"overnight overflow" parking*** issues. Existing campgrounds, lodgings, and employee housing limit overnight use in Yosemite Valley. Vehicles associated with overnight use are generally accommodated in parking spaces adjacent to overnight locations, leaving the remaining spaces available for day use. But some campers, lodging visitors, or NPS/concessioner employees occupy day-use parking as "overflow areas," providing convenience for overnight users at the expense of day use capacity. A 2011 parking monitoring study on holiday weekends provided estimates of "overnight overflow," which were incorporated into parking inventories and analyses.

Advantages and Disadvantages of Different Parking Types

There are advantages and disadvantages for different types of parking. Major issues are summarized below. Taken together, this information led NPS to reduce roadside parallel parking in most alternatives.

Roadside Parallel and Angled Parking

- Increases road circulation "friction" as vehicles occupy lanes in the road while entering or exiting parking spaces. Roadside spaces that include room outside the travel lanes for maneuvering take up more acreage, decreasing naturalness.
- Diminishes naturalness and viewscapes by creating a "wall" of development along roads. This is particularly noticeable when parking is on both sides of a road segment.
- Can create resource damage along roads, particularly when parking is "unendorsed" and results from parking shortages (as occurs on current high use days). Curbing or boulders/logs can reduce unendorsed parking, but the vast majority of East Valley roadside parking is not "defined." Curbs themselves have tradeoffs, and may appear "too developed."
- Is potentially less safe if parking requires visitors to use part of the road to maneuver, or if visitors exit their vehicles into or walk across roads.
- May be efficient if spaces are visible from the road and easy to identify as vacant.

Lot Parking

- Can be more aesthetic if screened from scenic driving or attraction site viewscapes.
- Can improve safety by separating parking vehicles and their pedestrians from faster moving vehicles on roads.
- May encourage greater resource "immersion" because the lot can be a "destination" rather than just a "quick roadside stop," encouraging visitors to take a walk or engage in other activities.
- Can guide visitors to appropriate trails or sites, decreasing impacts such as multiple trails across meadows (a recurring resource issue in El Capitan meadows, for example, where parallel parking fronts nearly its entire length).
- May require more acreage per vehicle than roadside parking, depending on the configuration.
- May be less efficient than roadside areas if visitors cannot tell if spaces are available and "drive around the lot" looking.
- May increase the sense of congestion or development.

Pedestrian Crossings

Under current conditions, vehicle – pedestrian conflicts along Northside Drive at the intersections near the Lodge and Camp 6 are major causes of traffic congestion, particularly during peak outbound traffic at the end of the day. These major crossings were factored into transportation modeling, showing the need for infrastructure improvements in the higher use alternatives. The preferred alternative includes realignment of Northside Drive near Camp 6 so that parking and Yosemite Village are on the same side, as well as grade-separated pedestrian crossing between Yosemite Lodge and the Yosemite Falls trails. Separating pedestrians from traffic at these two locations would remove "virtual traffic lights" (vehicles stopping for pedestrians) from the circulation system.

When assessing the pedestrian crossings, concerns include viewscape aesthetics and loss of naturalness. A tunnel under Northside Drive represents a new type of development in Yosemite Valley, and any design will require visitors to walk down grades rather than take the straightest path at road level.

Terrain, cultural resource impacts, and water tables are other design issues. At the Lodge crossing, there may be opportunities to combine an underpass with some restoration work to provide a larger connected floodplain for Yosemite Creek (which appears to be constrained to fewer braids than its historical number by Northside Drive). If the road were elevated with several box culverts, one of those might provide room for a pedestrian crossing. If the crossing goes below the creek bed and is subject to flooding, drainage and a sump pump may be necessary. In all cases, specific designs will attempt to avoid or mitigate cultural resource impacts.

A final consideration with pedestrian crossings is whether visitors are willing to use them (and avoid "jaywalking," which would defeat the crossing's purpose). Split rail fencing or other barriers along paths leading to the underpass, minimized grades, and aesthetics are important design components.

Accounting for Alternative Transportation

Alternative transportation is an important component of Yosemite access, and it was considered in transportation planning. Studies show that many visitors walk/bike on trails or ride shuttle buses to get around the Valley, and there has been some growth in regional transit and tour bus use. Research also shows considerable support for alternative transportation options (White 2007). However, alternative transportation participation was largely held constant in transportation modeling based on recent estimates. Alternative transportation topics include transit (from gateway communities or entrance gates to the Valley), in-Valley shuttles, and multi-use trails.

Transit and tour buses. The existing YARTS transit system offers opportunities to reduce private vehicle use in the Valley, but ridership is relatively low and this subsidized program currently has not noticeably reduced private vehicle use. The primary tradeoffs of increased transit include frequency of service and costs vs. reductions in private vehicles entering the Valley, improved parking availability, and faster travel times. In lower capacity alternatives that substantially reduce vehicle access to the Valley, demand for transit will probably increase.

Shuttle system. The existing shuttle system focuses on the East Valley. Shuttles reduce intra-Valley private vehicle traffic use after visitors have arrived, allowing efficient access to attractions or activities from overnight accommodations, campgrounds, and day use parking. High ridership suggests the shuttles are popular and effective. The preferred alternative extends shuttle service to Bridalveil Fall to help reduce private vehicle traffic to that site. The primary transportation tradeoffs with shuttle systems include frequency of service and costs vs. wait times and on-shuttle crowding. Shuttles are sometimes full on

current high use days, requiring visitors to wait for the next bus. Transportation analyses included shuttle system improvements needed to match capacities in each alternative.

Multi-use trails. The existing multi-use trail system reduces in-Valley private vehicle use, but might be improved. For many overnight (especially camping) users, bicycles are a primary form of in-Valley transportation. Trail expansion or improvements could further reduce in-valley vehicle trips, and may produce other benefits (e.g., exercise, distribute visitors temporally, direct visitors away from sensitive areas, get visitors "closer to the resource"). Aside from cost, possible tradeoffs of increasing the multi-use trail system include decreased naturalness, increase in bike-related congestion or conflicts on trails, and increased trail / road crossings that add to traffic friction. Careful design is needed to avoid such impacts.

APPENDIX T

WILD AND SCENIC RIVERS ACT SECTION 7 DETERMINATION

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APPENDIX T: MERCED WILD AND SCENIC RIVER COMPREHENSIVE MANAGEMENT PLAN/EIS: SECTION 7 DETERMINATION

Eighty-one miles of the Merced River (including the South Fork of the Merced River) within Yosemite National Park and the El Portal Administrative Site were designated as a Wild and Scenic River in 1987, in order to protect the river's free-flowing condition and to protect and enhance its unique values for the benefit and enjoyment of present and future generations (NPS 2013). This designation gives the Merced River special protection under the Wild and Scenic Rivers Act (WSRA). Section 7(a) of WSRA requires managing agencies to conduct a rigorous and consistent process to protect the free-flowing condition of the Merced River when a proposed *water resources project*[1] triggers a review, as described in Chapter 4 of the *Merced Wild and Scenic River Final Comprehensive Management Plan and Environmental Impact Statement* (*Merced River Plan*).

The preferred alternative in the *Merced River Plan* proposes several federally funded actions that would be located within the bed and banks of the Merced River or its tributaries, triggering additional review under section 7(a) of the Wild and Scenic Rivers Act. These proposed actions within the bed and banks of the Merced River are: (1) remove riverbank riprap, corridorwide; (2) place large wood in Segment 2; (3) remove Happy Isles Bridge footings and gauging station in Segment 2; (4) complete riparian restoration in Segment 2; (5) restore Greenemeyer Sand Pit in Segment 4; (6) maintain Wawona impoundment but remove abandoned infrastructure in Segments 6/7; and (7) complete riparian restoration in Segment 7.

Actions within the bed and banks of the river require a different standard and evaluative process than actions proposed on tributaries to the river, per the guidelines provided by the *Wild and Scenic Rivers Act, Section 7 Technical Report* of the Interagency Council (IWSRCC 2004). This Section 7 Determination evaluates actions within the bed and banks for their potential to have direct and adverse effects on free-flowing condition, water quality, and outstandingly remarkable values. This is known as the "direct and adverse effect" standard. Actions that would take place on tributaries to the Merced River are evaluated for their potential to either invade or diminish the scenic, recreational, fish, or wildlife values of the wild and scenic river. There are no actions that are proposed to take place in tributaries to the Merced River under the Merced River Plan. Therefore, no "invade or diminish" analysis has been conducted.

[1] A water resources project is any dam, water conduit, powerhouse, transmission line, or other works project under the Federal Power Act, or other developments, that would affect the free-flowing character of a wild and scenic or congressionally authorized study river. In addition to projects licensed by the Federal Energy Regulatory Commission, water resources project may include dams, water diversions, fisheries habitat and watershed restoration, bridges and other roadway construction/reconstruction projects, bank stabilization projects, channelization projects, levee construction, boat ramps, fishing piers, and activities that require a section 404 permit from the U.S. Army Corps of Engineers.

AUTHORITY

The authority for this determination is found in section 7(a) of the Wild and Scenic Rivers Act (Public Law 90-542, as amended, 16 United States Code [USC] 271-1278). Section 7 states that:

> *No department or agency of the United States shall assist by loan, grant, license or otherwise in the construction of any water resources project that would have a direct and adverse effect on the values for which such river was established, as determined by the Secretary charged with its administration.*

PART I. PROPOSED WATER RESOURCE PROJECTS WITHIN THE MERCED RIVER CORRIDOR

Methodology

Proposed actions within the river corridor will be evaluated as follows for their potential to have direct and adverse effects on free-flowing condition, water quality, and the outstandingly remarkable values identified for the river using the following process, as adopted from Interagency Council guidelines (2004 IWSRCC):

- Define the context of the project – purpose and need, geographic location, duration, magnitude and extent of proposed activities, and relationship to past and future management activities:

  Determine whether the proposed activity would directly alter within-channel conditions.

- Describe the position of the proposed activity relative to the streambed and streambanks. Describe likely changes in active channel location; channel geometry, channel slope, channel form, water quality, and navigation of the river. Address the magnitude and spatial extent of the effects.

- Determine whether the proposed activity would directly alter riparian and/or floodplain conditions:

  Describe the position of the proposed activity relative to the riparian area and floodplain. Analyze likely changes in vegetation (composition, age structure, quantity, or vigor), relevant soil properties (compaction, percent bare ground), relevant floodplain properties (width, roughness, bank stability, susceptibility to erosion). Address the magnitude and spatial extent of effects on riparian/floodplain attributes.

- Determine whether the proposed activity would directly alter upland conditions:

  Describe the position of the project relative to uplands. Analyze likely changes in vegetation, soils, or relevant hydrologic properties (e.g., drainage patterns or the character of surface and subsurface flows.

- Evaluate and describe likely changes in on-site conditions that would alter existing hydrological processes:

  These processes include the ability of the channel to change course, re-occupy former segments, or inundate its floodplain; streambank erosion potential, sediment routing and deposition; or debris loading; amount and timing of flows surface and subsurface flow characteristics; flood storage; aggradation/degradation of the channel.

- Evaluate and describe likely changes in on-site conditions that would alter existing biological processes:

These processes include reproduction, vigor, growth and/or succession of streamside vegetation; nutrient cycling; fish spawning or rearing; riparian dependent avian species needs; amphibian/mollusk needs; and native species diversity.

- Address potential off-site or indirect effects of the proposed activity.
- Compare the project analysis to management goals:

  Identify the effects of the project on management goals relative to free flow, water quality, riparian area and floodplain conditions, Outstandingly Remarkable Values (ORVs), and river segment classification.

- Based on the analysis, determine the effects of the proposed activity on the river's free flowing conditions, water quality, and ORVs.

Project Description

A complete description of Alternative 5 (Preferred Alternative): Enhanced Visitor Experience and Essential River Bank Restoration in presented in Chapter 8. River segments and their classifications are defined in detail in Chapter 3. Briefly, Segment 1 refers to the Merced River upper watershed above Yosemite Valley; Segments 2A and 2B refer to Yosemite Valley (east and west, respectively); Segment 4 refers to El Portal; Segments 6 and 7 refer to Wawona; the term, "corridorwide" refers to all segments as applicable. Chapter 5 includes a complete description of the ORVs for the Merced River.

The final preferred alternative proposes the following actions within the bed and banks of the Merced River.

(1) Corridorwide Riprap Removal

Remove riprap from at least 6,135 linear feet of riverbank in various locations to restore natural processes. Replace riprap with riparian vegetation and revegetate river banks with riparian species in various locations along 3,400 linear feet. Along 2,300 linear feet, use bioengineering techniques where riverbank stabilization is necessary for infrastructure protection.

(2) Yosemite Valley Placement of large wood (Segment 2A)

Large wood, including logjams, would be placed into river banks and the river channel. A total of eight log jams would be constructed between Clark's Bridge and Sentinel Bridge, in order to address river widening and low channel complexity. Installation of large wood would be used to enhance riparian habitat and provide additional channel complexity, and also to provide structure for eroded riverbanks. Large wood would also be placed so as to lessen scouring from bridge abutments, as relevant, using brush layering and placing engineered log jams. Note that all historic bridges would be retained under the Preferred Alternative. In order to mitigate for the hydrologic effects of retaining Sugar Pine, Ahwahnee, and Stoneman bridges, large wood would be placed along the riverbanks to minimize scouring upstream of each bridge.

(3) Remove former Happy Isles Footbridge footings and Pohono Gauging Station (Segments 2A and 2B)

Bridge footings from the former Happy Isles footbridge would be removed. Outdated facilities and infrastructure at the Pohono gauging station would also be removed – specifically, the gauge building would be removed from within the bank and beds or the river.

(4) Yosemite Valley Riparian Restoration (Segments 2A and 2B)

Campsites within the ordinary highwater mark at Lower Pine Campground would be removed. River access would be directed to sandy beaches and sandbars, which are more resilient to disturbance; formal access sites would be designated. Sensitive riparian areas would be fenced off and restored with native vegetation. Signage would be used to protect sensitive riparian areas in the vicinity of North Pines Campground, Upper and Lower River Campgrounds, and Housekeeping Camp. Lodging and other facilities currently located within the ordinary high water mark at Housekeeping Camp would also be removed, with restoration of native riparian habitat. Localized riverbank restoration would be completed using brush layering techniques to repair localized riverbank erosion. These areas would also be closed from public access. Riverbanks to be addressed include those near Backpackers Camp and the Lower Pines and North Pines Campgrounds; Housekeeping Camp; the Yosemite Lodge beach access; the Swinging Bridge, Sentinel Beach, and Cathedral Beach picnic areas, and Devil's Elbow; the riverside areas between Pohono Bridge and the El Portal Road/Big Oak Flat Road intersection; and along the Valley Loop Trail. Also restore 10.9 acres of riparian habitat at the site of former Pine and Oak units at the Yosemite Lodge and wellness center.

(5) Restoration of Greenemeyer Sand Pit in El Portal (Segment 4)

Greenemeyer Sand Pit is a former mine operation area. It contains fill material that prevents seasonal inundation and regeneration of riparian plants. Ecological restoration would remedy this issue via removal of fill and recontouring.

(6) Wawona Impoundment and Water Conservation Plan (Segments 6 and 7)

The current water intake (Wawona Impoundment) and existing water collection and distribution system would be retained. The abandoned infrastructure in the South Fork side channel that dewaters the associated terrace would be removed.

(7) Wawona Riparian Restoration (Segment 7)

Portions of the Wawona Campground would be ecologically restored. Campsites located within 100-feet of the ordinary highwater mark would be removed and/or relocated.

(8) Corridorwide Water Quality Enhancement Actions

The Wawona Water Conservation Plan would continue to be implemented to the minimum flows for the South Fork is achieved during the dry season. The pack trail from Concessioner Stables in Yosemite Valley to Happy Isles would be rerouted away from the river's edge and the area restored to natural conditions. Odger's Bulk Fuel Storage Facility in El Portal would be removed from the 500-year floodplain. The Yosemite Village Day-use Parking Area would be redesigned and 150-feet north of the ordinary highwater mark and the meadow and floodplain communities restored. Stormwater run-off mitigation measures would be incorporated into parking area design. The Upper Pines RV dump station in Yosemite Valley would be relocated to a site between Curry Village and the Campgrounds, at least 150-feet from the ordinary highwater mark. Similarly, the Wawona RV dump station would be relocated from the Wawona Store Area to the Wawona Campground, at least 150-feet from the ordinary highwater mark. The Wawona Campground would be connected to the Wawona Wastewater Treatment Plant. Two formal picnic areas in Wawona would delineate river access points. Riverbank restoration actions would address

accelerated riverbank erosion and potential sediment loading.

Analysis

The effects of the proposed water resources actions within the Merced River corridor are outlined in Table T-1.

TABLE T-1 EFFECTS OF THE PROPOSED WATER RESOURCES ACTIONS WITHIN THE MERCED RIVER CORRIDOR

(1) Corridorwide Riprap Removal	(2) Placement of Large Wood in Yosemite Valley	(3) Remove Happy Isles footbridge footings and Pohono Gauging Station	(4) Yosemite Valley Riparian Restoration	(5) Restoration of Greenemeyer Sand Pit in El Portal	(6) Wawona Impoundment and Wawona	(7) Wawona Riparian Restoration	(8) Corridorwide Water Quality Enhancement
Effects on Within-Channel Conditions							
Existing riprap interferes with natural hydrologic processes, interfering with the free-flowing condition of the river. The action would restore the river channel to a more natural configuration.	Placement of large wood would help to address historic bank widening, reductions in channel complexity due to the historic removal of large wood, and restore natural stream processes. Large wood would also help to deflect erosive flows away from sensitive areas, reduce scour, and promote desirable sediment deposition.	Removing the gauging station infrastructure would remove existing impediments from the river channel that currently interfere with the alluvial river process.	Removal of the campground loop, lodging and other facilities within the bed and banks of the river at Lower Pine campground would provide limited benefit to the free-flowing condition of the river. Restoration within the riparian corridor and outside of the channel is not likely to alter within-channel attributes such as active channel location, channel geometry, slope, or form.	The action would restore the river channel margins and floodplain to a natural configuration.	The action would result in continued operation of the existing water collection system (diversion at 0.59 cubic feet per second or less than 10% of total discharge), but would remove abandoned infrastructure, thereby locally enhancing the free-flowing condition of the river.	Removal of campsites from within 100 feet of bed and banks of river would reduce bankside erosion and help to restore natural river processes.	Retaining the current water collection system, implementing water conservation measures to ensure minimum flows, connecting the Wawona Campground to the Wastewater Collection System, and riverbank restoration would address seasonal water quality concerns and accelerated riverbank erosion and potential sediment loading.
Effects on Riparian and Floodplain Conditions							
Existing rip-rap prevents some flood flows from reaching portions of the floodplain. The action would restore natural floodplain processes and allow establishment of riparian vegetation.	Placement of large wood would reduce the potential for accelerated streambank erosion and help to provide a foundation to establish natural riparian vegetation along the riverbank.	Riparian and floodplain conditions would be largely unaffected.	Riverbank restoration would reduce existing erosion. The action would also support enhancement of riparian structure and quantity, and help to return riparian and floodplain areas to more natural conditions.	Existing fill at the sand pit prevents high flows from reaching adjacent riparian areas. Recontouring will allow flooding of these areas, and will support regeneration of riparian vegetation.	Riparian and floodplain conditions would be largely unaffected.	The action would allow establishment of riparian vegetation, enhancing floodplain habitat and potentially enhancing water quality parameters such as turbidity.	Rerouting trails, restoring natural conditions, removing infrastructure from floodplain and from within 150-feet from the ordinary highwater mark, addressing stormwater run-off, and delineating use areas would restore natural floodplain and riparian conditions.
Effects on Upland Conditions							
Upland conditions would be largely unaffected.	Upland conditions would be largely unaffected.	Upland conditions would be largely unaffected.	Upland conditions would be largely unaffected.	Upland conditions would be largely unaffected.	Upland conditions would be largely unaffected.	Upland conditions would be largely unaffected.	Upland conditions would be largely unaffected.

TABLE T-1 EFFECTS OF THE PROPOSED WATER RESOURCES ACTIONS WITHIN THE MERCED RIVER CORRIDOR

(1) Corridorwide Riprap Removal	(2) Placement of Large Wood in Yosemite Valley	(3) Remove Happy Isles footbridge footings and Pohono Gauging Station	(4) Yosemite Valley Riparian Restoration	(5) Restoration of Greenemeyer Sand Pit in El Portal	(6) Wawona Impoundment and Wawona	(7) Wawona Riparian Restoration	(8) Corridorwide Water Quality Enhancement
Effects on Existing Hydrological/Geological Processes and Biological River Values							
The action would restore natural hydrologic processes within the river in localized areas where riprap removal would occur.	Placement of large wood would help to enhance riparian habitat and in channel habitat, by providing additional channel complexity and providing structure for eroded riverbanks.	The action would remove existing structures that interfere with flow and the existing river bank, and would result in a localized, negligible benefit on hydrological and biological processes.	The action would remove existing facilities that minimally interfere with the natural flow of the river. The action would also support restoration and enhancement of existing biological resources, and would benefit hydrological processes as noted above.	The action would restore the ability of the river to inundate riparian areas at the Greenemeyer Sand Pit site, thereby supporting riparian vegetation growth and natural floodplain function.	Continued diversion would constitute a negligible adverse impact on hydrology; however, removal of abandoned infrastructure would have a localized and negligible benefit to the free flowing condition of the river.	The action would reduce the potential for accelerated streambank erosion, and help to enhance riparian vegetation and habitat.	Same as the actions that restore natural floodplain and riparian conditions.
Off-site Changes							
None	None	None	Limited numbers of camp sites will be removed within 100-feet of the ordinary highwater mark at North Pines (-14) and Lower Pines (-5) Campgrounds	None	None	A limited number of camp sites will be removed within 100-feet of the ordinary highwater mark at Wawona Campground (-13).	None
Comparison with Management Goals							
Consistent with goals to protect and enhance the hydrological/geological processes.	Consistent with goals to protect and enhance the hydrological/geological processes.	Consistent with goals to protect and enhance the hydrological/geological processes.	Consistent with goals to protect and enhance the hydrological/geological processes, and to establish riparian vegetation.	Consistent with goals to protect and enhance the hydrological/geological processes, and to establish riparian vegetation.	Consistent with goals to protect and enhance the hydrological/geological processes.	Consistent with goals to protect and enhance the hydrological/geological processes, and to establish riparian vegetation.	Consistent with goals to protect and enhance water quality and enhance the hydrological/geological processes.

TABLE T-1 EFFECTS OF THE PROPOSED WATER RESOURCES ACTIONS WITHIN THE MERCED RIVER CORRIDOR

(1) Corridorwide Riprap Removal	(2) Placement of Large Wood in Yosemite Valley	(3) Remove Happy Isles footbridge footings and Pohono Gauging Station	(4) Yosemite Valley Riparian Restoration	(5) Restoration of Greenemeyer Sand Pit in El Portal	(6) Wawona Impoundment and Wawona	(7) Wawona Riparian Restoration	(8) Corridorwide Water Quality Enhancement
Effects on Outstandingly Remarkable Values							
The action would enhance free-flowing condition of the river, and would contribute to a minor beneficial impact on hydrology. The action would also contribute to a moderate beneficial impact on riparian plant communities and special status species, a minor beneficial impact on scenic resources. The action would not affect cultural or archaeological resources, or recreational access to the area.	In this segment, Placement of large wood would provide benefit to special status species and biological resources values, and would not affect cultural or archaeological resources, scenic resources, or recreational access to the area, but would enhance the quality of visitor experience.	In this segment, the action would enhance the free-flowing condition of the river, and would contribute negligible benefits to biological resources values. Other ORVs would not be affected.	In this segment, the action would provide benefit to special status species, vegetation, and wildlife within affected areas, and would enhance the free-flowing condition of the river. The action would limit recreational access in certain areas, but would otherwise enhance the quality of visitor experience due to restoration to a natural condition. Restoration would benefit archaeological and cultural resources by limiting visitor trampling and reducing displacement of artifacts and vandalism.	In this segment, the action would enhance free-flowing condition of the river, and would provide benefit to riparian biological resources values including vegetation, wildlife, and special status species. Restoration would result in a benefit to scenic resources and would enhance the quality of visitor experience. The action would not affect recreation or cultural or historic resources.	The action would result in continued negligible interference with the free-flowing condition of the river, but would enhance the free-flowing condition by removing existing in-rive infrastructure. The action would not affect other ORVs.	In this segment, the action would provide benefit to special status species, vegetation, and wildlife within affected areas, and would enhance the free-flowing condition of the river. The action would limit recreational access in certain areas, but would otherwise enhance the quality of visitor experience due to restoration to a natural condition.	The actions to enhance water quality similarly would protect and enhance the biological and hydrological / geological processes river values. No some locations special consideration will be taken to avoid adverse effects to archeological resources and other components of cultural river values.

SECTION 7 DETERMINATION

The Merced Wild and Scenic River Plan includes actions to: (1) remove riverbank riprap, corridorwide; (2) place large wood in Segment 2; (3) remove Happy Isles Bridge footings and gauging station in Segment 2; (4) complete riparian restoration in Segment 2; (5) restore Greenemeyer Sand Pit in Segment 4; (6) maintain Wawona impoundment but remove abandoned infrastructure in Segments 6/7; (7) complete riparian restoration in Segment 7; and (8) enhance water quality corridorwide. These actions are consistent with management goals to protect and enhance free-flowing condition, water quality, and the biological and hydrological/geological processes outstandingly remarkable values including.

In conjunction with specific mitigation measures outlined in Appendix C of the Final Merced River Plan/EIS, the National Park Service has determined that these actions within the river corridor will not have direct and adverse effects on free-flowing condition, water quality, and/or outstandingly remarkable values of the Merced River.

_____ _____

Recommended by Don L. Neubacher, Superintendent Date

_____ _____

Approved by Chris Lehnertz, Regional Director Date

REFERENCES

Interagency Wild and Scenic Rivers Coordinating Council. (IWSRCC)

2004 Wild and Scenic Rivers Act: Section 7 Technical Report.

National Park Service (NPS)

2013 Administrative draft *Merced Wild and Scenic River Final Comprehensive Management Plan and Environmental Impact Statement*. Accessed December 12, 2013.

National Park Service
U.S. Department of the Interior

Merced Wild and Scenic River
Final Comprehensive Management Plan
and Environmental Impact Statement
Yosemite National Park
P.O. Box 577
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www.nps.gov/yose/parkmgmt/mrp.htm

As the nation's principal conservation agency, the Department of the Interior has responsibility for most of our nationally owned lands and natural resources. This includes fostering sound use of our land and water resources; protecting our fish, wildlife, and biological diversity; preserving the environmental and cultural values of our national parks and historical places; and providing for the enjoyment of life through outdoor recreation. The department assesses our energy and mineral resources and works to ensure that their development is in the best interests of all people by encouraging stewardship and citizen participation in their care. The department also has a major responsibility for American Indian reservation communities and for people who live in island territories under U.S. administration.