

Invasive Plant Management Plan Update Environmental Assessment

Public Scoping Comment and Concern Report

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Centaurea solstitialis

Department of the Interior
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Table of Contents

Introductioni

Methodology.....1

How to Use This Document.....2

Concern Statements.....3

Alternatives: New Alternatives Or Elements3

Planning: Applicable Laws and Regulations3

Affected Environment: Cultural Resources4

Affected Environment: Wetlands.....4

Purpose And Need: Planning Process And Policy4

Visitor Conflicts And Safety: Impact Of Proposal And Alternatives6

Planning: Relationship to other Park Plans/Planning.....6

Planning: Public Involvement7

Alternatives: Development of Proposed Alternatives.....7

Alternatives: Proposed Alternatives9

Resources: Monitoring Management Effects9

Resources: Environmental Consequences10

Ecosystem Processes: Environmental Consequences10

Water Resources: Environmental Consequences11

Wetlands: Monitoring Management Effects12

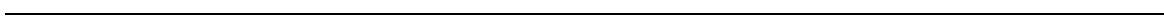
Wetlands: Environmental Consequences12

Wildlife: Environmental Consequences13

Rare, Threatened, and Endangered Species14

Special: Monitoring Management Effects14

Special-Wild and Scenic River Act: Environmental Consequences.....15



INTRODUCTION

This Public Scoping Comment and Concern Report summarizes public comments submitted for the Invasive Plant Management Plan Update EA during the public scoping period. This process ensures that public comments are reviewed and that substantive comments are considered during the development of the environmental assessment, as required by the National Environmental Policy Act (NEPA) and National Park Service Director's Order #12. The report also allows the park to identify substantive comments that are of special management concern, such as those notifying of or implying legal action, concerns regarding the NEPA process, comments that suggest a new alternative, and formal letters from agencies, tribes, and organizations.

Public scoping for this project was held from April 14 to May 15, 2010. A scoping announcement was sent out to a list of 212 individuals, tribes, agencies, park special use permit holders and organizations that had been identified as potential stakeholders. Written public comments were received by U.S. mail and by e-mail. A press release announcing public scoping was printed in the March 24th, 2010 Yosemite National Park Electronic Newsletter which is emailed to a list of approximately 7,000 people, and the March 25th, 2010 Mariposa Gazette. The scoping period was also announced on the park's website. Invitations to open houses held on March 31st and April 28th, 2010 in Yosemite Valley were included in the press release. A walk was held as part of the April 28th open house to show the public the challenges involved in managing invasive species in the park. Although not included in this report, public comments received on the 2008 Invasive Plant Management Plan EA (published in the 2008 FONSI) and comments from other agencies are also being reviewed by the project team for relevancy and applicability to the new environmental assessment. During the comment period, 5 public comment letters were received, three from unaffiliated individuals and two from members of separate chapters of the Sierra Club.

METHODOLOGY

Public comments received during the public comment period were reviewed and analyzed using the Planning, Environment, and Public Comment (PEPC) system. The project planning team conducts analysis of public comment letters in a series of stages. Initially, each letter received is reviewed to determine the discrete points the author is expressing. Each sentence or paragraph in the letter is then "coded" in order to associate that comment with a particular resource topic or element of the plan (such as air quality or the plan's relationship to other projects). Code categories are derived from an analysis of the range of topics covered in relevant present and past planning documents. The codes allow for quick access for comments on specific topics. The comments were also rated as substantive or non-substantive based upon issue importance, controversy and the likelihood of litigation related to any particular code.

Once all letters have been coded for individual comments, similar comments are grouped together and a "concern statement" is generated, which is intended to capture the main points of what the comments are addressing. Concern statements are worded in a way that affords the National Park Service the opportunity to respond to a requested action. Concern statements are then screened to determine whether or not further clarification is need to be made in the document or whether they call for a modification of the proposed action. In the case of the latter, these types of concerns would be brought to park management for deliberation. Finally, the planning team prepares responses presenting the National Park Service's reasoning as to how and why public concerns will be incorporated into the planning process.

The posting of public comments is a result of requests made during the scoping process for this planning effort. This report will be reviewed by the interdisciplinary team that is writing the

Update to the Invasive Plant Management Plan. Public interests and concerns will aid in the development of a range of alternatives to address the purpose and need of this project. As a direct result of public input, all comments are made available for review on the park's web site at: <http://www.nps.gov/yose/parkmgmt/invasive.htm>.



Rubus armeniacus in a riparian area

HOW TO USE THIS DOCUMENT

This Report is divided into sections based upon code topic, see Table of Contents. Each section includes one or more comments supported by the statements of public concern. These public concerns present common themes identified from comments in a statement that captures what action the public feels the National Park Service should undertake. [Note: Because all public concerns are presented, statements can be contradictory.]

Each public concern is followed by supporting quotes from public comments referenced to original letters. Each supporting quote is followed by an attribute which identifies the number assigned to the original letter it came from, whether the comment was made by an individual or an organization, a general description of the organization type, and a reference to the correspondence number and the comment number within the letter.

CONCERN STATEMENTS

AL4000 Alternatives: New Alternatives or Elements (Substantive)

Correspondence Id: 2 **Comment Id:** 142345

Concern Statement: NPS should not use Herbicides.

Comment Text: Herbicides should not be used at all.

Organization: Ahwahneechee Band of Piautes

Commenter: Louise M. Rhoan

Correspondence Id: 1 **Comment Id:** 142343

Concern Statement: NPS should use goats to control invasive species.

Comment Text: Have you thought about the use of goats? Goats in a pen will eat the plants that you are trying to remove.

Organization:

Commenter: Tracy Webster

Kept Private: No

YO13000 PLANN: Applicable Laws and Regulations (Substantive)

Correspondence Id: 4 **Comment Id:** 142361

Concern Statement: NPS should consider whether or not the potential impacts of the proposed actions are so great as to require an EIS.

Comment Text: Are the potential impacts of the proposed actions so great as to require an EIS?

Organization: Tehipite Chapter Yosemite Committee

Commenter: George Whitmore

Kept Private: No

AE13000 Affected Environment: Cultural Resources (Non-Substantive)

Correspondence Id: 2 **Comment Id:** 142344

Concern Statement: NPS should consult with Native Elders regarding preserving plants and sites used for basket making, medicines, and food.

Comment Text: MY hope is that the Park Service will consult with Native Elders as to preserving their plants and sites they used for Basket making, medicines and food they ate.

Herbicides should not be used at all.

Organization: Ahwahneechee Band of Piautes

Commenter: Louise M. Rhoan

Kept Private: No

AE5000 Affected Environment: Wetlands (Non-Substantive)

Correspondence Id: 5 Comment Id: 142394

Concern Statement: How will NPS ensure that herbicides do not spread into and negatively impact the surrounding ecosystem and non-target species?

Comment Text: One is the plan to greatly expand the use of herbicides. Removing the invasive species is important but herbicides can spread beyond the intended location and could impact non-targeted species. What steps will be taken to insure that the herbicides do not affect the surrounding ecosystem?

Organization:

Commenter: Marsha Novak

Kept Private: No

Correspondence Id: 4 Comment Id: 142358

Concern Statement: How will NPS minimize harm to endangered amphibians and less obvious life forms including micro-organisms?

Comment Text: How can harm to aquatic species, especially endangered amphibians, be minimized? How can harm to the less obvious life forms, including micro-organisms, be minimized?

Organization: Tehipite Chapter Yosemite Committee

Commenter: George Whitmore

Kept Private: No

PN1000 Purpose And Need: Planning Process And Policy (Non-Substantive)

Correspondence Id: 5 Comment Id: 142395

Concern Statement: NPS should study the impacts of increased use of herbicides in the park.

Comment Text: While I do understand that mechanical means to remove invasive species has not been very successful, I would like the impact of increased use of herbicides in the park be more extensively studied before any plan goes into effect.

Organization:

Commenter: Marsha Novak

Kept Private: No

Correspondence Id: 5 Comment Id: 142364

Concern Statement: NPS should understand the importance of removing invasive species.

Comment Text: Having personally seen the damage that an invasive plant, such as the Kudzu Vine, can do, I understand the need to have an Invasive Plant Management Plan. Removing the invasive species is important

Organization:

Commenter: Marsha Novak

Kept Private: No



Monitoring *Bromus tectorum*

Correspondence Id: 3 **Comment Id:** 142346

Concern Statement: NPS should employ all reasonable, available and promising technologies and herbicides to protect the park's ecosystems from invasive species.

Comment Text: NPS should recognize urgent need for employing all reasonable, available and promising technologies and new promising herbicidal agents as quickly as possible to control or eliminate the many noxious exotic invasive weed species invading and disrupting Yosemite's natural ecosystems to increase the effectiveness of the Park's eradication and control efforts.

Organization: Sierra Club, Yosemite Committee

Commenter: Alan Carlton

Kept Private: No

VS4000 Visitor Conflicts And Safety: Impact Of Proposal And Alternatives (Non-Substantive)

Correspondence Id: 3 **Comment Id:** 142347

Concern Statement: NPS should review all new herbicides under consideration for use for efficacy, impacts to non target plant and animal species, persistence, mobility, human toxicity, and other adverse environmental factors.

Comment Text: New chemical agents under consideration for use in the invasive plant management program must be thoroughly reviewed for efficacy, impacts to non target plant and animal species, persistence, mobility, human toxicity, and other adverse environmental factors. If a new agent meets these criteria and there is no reasonable concern or information that it would be harmful to humans or the environment it should be included as an additional tool to control these damaging invaders.

Organization: Sierra Club, Yosemite Committee

Commenter: Alan Carlton

Kept Private: No

YO12400 PLANN: Relationship to other Park Plans/Planning (Non-Substantive)

Correspondence Id: 4 **Comment Id:** 142357

Concern Statement: NPS should make the the IPMP Update an interim plan until a Merced River Plan is approved.

Comment Text: How can an IPM Plan be devised in the absence of a Merced River Plan? (Perhaps it needs to be acknowledged that the IPMP will be interim, and may need to be revised after the MRP is adopted.)

Organization: Tehipite Chapter Yosemite Committee

Commenter: George Whitmore

Kept Private: No

YO15100 PLANN: Public Involvement (Non-Substantive)

Correspondence Id: 5 **Comment Id:** 142366

Concern Statement: NPS should make the IPMP Update easier to find on the park website.

Comment Text: Finally, I would like to mention the difficulty of actually finding the Invasive Plant Management Plan on the Yosemite NPS website. To find the plan, I had to click on "management" and then "park planning". At this point, I would have expected the find the plan there but had to continue to click on "project status" and then "implementation planning document" to finally find the plan. It was just by chance and perseverance that I was able to find it.

Organization:

Commenter: Marsha Novak

Kept Private: No

Correspondence Id: 4 **Comment Id:** 142363

Concern Statement: NPS should incorporate a process for continuing public involvement into the plan.

Comment Text: How can a process for continuing public involvement be incorporated into the plan?

Organization: Tehipite Chapter Yosemite Committee

Commenter: George Whitmore

Kept Private: No

YO21000 ALTER: Development of Proposed Alternatives (Non-Substantive)

Correspondence Id: 4 **Comment Id:** 142362

Concern Statement: NPS should devise a plan which establishes parameters, but which is not so restrictive as to be counter-productive.

Comment Text: How can a plan be devised which establishes parameters, but which is not so restrictive as to be counter-productive?

Organization: Tehipite Chapter Yosemite Committee

Commenter: George Whitmore

Kept Private: No

Correspondence Id: 4 **Comment Id:** 142360

Concern Statement: NPS should place special restrictions on new herbicides because of their lesser track record.

Comment Text: What special restrictions are needed on newer herbicides because of their lesser track record?

Organization: Tehipite Chapter Yosemite Committee

Commenter: George Whitmore

Kept Private: No

YO23000 ALTER: Proposed Alternatives (Generally) (Non-Substantive)

Correspondence Id: 5 **Comment Id:** 142367

Concern Statement: NPS should do additional studies on herbicides in natural settings.

Comment Text: The plan also calls for the use of newer herbicides and also herbicides that have yet to be developed. The possible use of herbicides that have been testing in agricultural settings and, not in a park is concerning.

Organization:

Commenter: Marsha Novak

Kept Private: No

Correspondence Id: 4 **Comment Id:** 142354

Concern Statement: NPS should limit expanded use of herbicides.

Comment Text: we are troubled by what we now perceive as unwarranted enthusiasm within the NPS for a greatly expanded use of herbicides.

Organization: Tehipite Chapter Yosemite Committee

Commenter: George Whitmore

Kept Private: No



Spraying *Rubus armeniacus*

Correspondence Id: 3 **Comment Id:** 142349

Concern Statement: NPS should combine mechanical removal techniques with judicious hand application of time tested and carefully selected new herbicidal agents will be the most effective method of controlling the many noxious invasive plants invading and destroying the natural ecosystems in Yosemite National Park.

Comment Text: Combining mechanical removal techniques with judicious hand application of time tested and carefully selected new herbicidal agents while using extreme caution near standing or running water in riparian and wetland areas will be the most effective method of controlling the many noxious invasive plants invading and destroying the natural ecosystems in Yosemite National Park. The sooner the problem is attacked using the latest techniques and promising new herbicides available, the more successful the program will be in controlling this dire threat to Yosemite's resources.

Organization: Sierra Club, Yosemite Committee

Commenter: Alan Carlton

Kept Private: No

Correspondence Id: 3 **Comment Id:** 142346

Concern Statement: NPS should recognize urgent need for employing all reasonable, available and promising technologies and new promising herbicidal agents as quickly as possible to control or eliminate the many noxious exotic invasive weed species invading and disrupting Yosemite's natural ecosystems to increase the effectiveness of the Park's eradication and control efforts.

Comment Text: There is an urgent need to employ all reasonable technologies and new promising herbicidal agents available to control or eliminate the many noxious exotic invasive weed species invading and disrupting Yosemite's natural ecosystems. New agents have the potential to have even fewer impacts and greater efficacy than those in current use. Eliminating new products from consideration now because years of environmental review and field testing data are not available while invasive noxious exotic plants are aggressively degrading and destroying Yosemite's natural resources would not be in the best interest of protecting the Parks endangered native plant communities.

Organization: Sierra Club, Yosemite Committee

Commenter: Alan Carlton

Kept Private: No

YO30500 RESOU: Monitoring Management Effects (Non-Substantive)

Correspondence Id: 4 **Comment Id:** 142359

Concern Statement: NPS should consider the influence of agriculture on the development and approval of herbicides when evaluating possible use in natural ecosystems.

Comment Text: How can the influence of agriculture on the development and approval of herbicides be taken into account when evaluating possible use in natural ecosystems?

Organization: Tehipite Chapter Yosemite Committee

Commenter: George Whitmore

Kept Private: No

Correspondence Id: 3 **Comment Id:** 142347

Organization: Sierra Club, Yosemite Committee

Commenter: Alan Carlton

Kept Private: No

YO30700 RESOU: Environmental Consequences (Non-Substantive)

Correspondence Id: 4 **Comment Id:** 142396

Concern Statement: NPS should develop protocol for evaluating and using newer herbicides given their lesser track record.

Comment Text: What special protocols are needed to evaluate and use newer herbicides in view of their lesser track record?

Organization: Tehipite Chapter Yosemite Committee

Commenter: George Whitmore

Kept Private: No

Correspondence Id: 4 **Comment Id:** 142359

Concern Statement: NPS should consider the influence of agriculture on the development and approval of herbicides when evaluating possible use in natural ecosystems.

Comment Text: How can the influence of agriculture on the development and approval of herbicides be taken into account when evaluating possible use in natural ecosystems?

Organization: Tehipite Chapter Yosemite Committee

Commenter: George Whitmore

Kept Private: No

Correspondence Id: 3 **Comment Id:** 142349

Concern Statement: NPS should combine mechanical removal techniques with judicious hand application of time tested and carefully selected new herbicidal agents will be the most effective method of controlling the many noxious invasive plants invading and destroying the natural ecosystems in Yosemite National Park.

Comment Text: Combining mechanical removal techniques with judicious hand application of time tested and carefully selected new herbicidal agents while using extreme caution near standing or running water in riparian and wetland areas will be the most effective method of controlling the many noxious invasive plants invading and destroying the natural ecosystems in Yosemite National Park. The sooner the problem is attacked using the latest techniques and promising new herbicides available, the more successful the program will be in controlling this dire threat to Yosemite's resources.

Organization: Sierra Club, Yosemite Committee

Commenter: Alan Carlton

Kept Private: No

YO31700 ECOSY: Environmental Consequences (Non-Substantive)

Correspondence Id: 5 **Comment Id:** 142394

Concern Statement: NPS should take steps to ensure that herbicides do not negatively

affect surrounding ecosystems.

Comment Text: One is the plan to greatly expand the use of herbicides. Removing the invasive species is important but herbicides can spread beyond the intended location and could impact non-targeted species. What steps will be taken to insure that the herbicides do not affect the surrounding ecosystem?

Organization:

Commenter: Marsha Novak

Kept Private: No

Correspondence Id: 5 **Comment Id:** 142367

Concern Statement: NPS should test new herbicides in wildlands and place special restrictions on newer herbicides.

Comment Text: The plan also calls for the use of newer herbicides and also herbicides that have yet to be developed. The possible use of herbicides that have been testing in agricultural settings and, not in a park is concerning. What special restrictions will be used for newer herbicides that have not been studied long term?

Organization:

Commenter: Marsha Novak

Kept Private: No



Holcus lanatus

YO32700 WATER: Environmental Consequences (Non-Substantive)

Correspondence Id: 5 **Comment Id:** 142394

Concern Statement: NPS should ensure that herbicides do not negatively impact

surrounding ecosystems.

Comment Text: One is the plan to greatly expand the use of herbicides. Removing the invasive species is important but herbicides can spread beyond the intended location and could impact non-targeted species. What steps will be taken to insure that the herbicides do not affect the surrounding ecosystem?

Organization:

Commenter: Marsha Novak

Kept Private: No

Correspondence Id: 3 **Comment Id:** 142348

Concern Statement: NPS should exercise extreme caution when using herbicides near standing or running water in riparian and wetland areas to minimize harm to aquatic species.

Comment Text: I am also concerned about the possibility of herbicides being used in riparian and aquatic areas. The presence of water could increase the chance that the applied herbicide could be spread beyond the area that is targeted. Non targeted aquatic plants and also aquatic animals and those that feed on them could be affected. How will harm to aquatic species be minimized?

Organization: Sierra Club, Yosemite Committee

Commenter: Alan Carlton

Kept Private: No

YO33500 WETLD: Monitoring Management Effects (Non-Substantive)

Correspondence Id: 3 **Comment Id:** 142348

Concern Statement: Extreme caution must be exercised near standing or running water in riparian and wetland areas.

Comment Text: NPS should exercise extreme caution when using herbicides near standing or running water in riparian and wetland areas.

Organization: Sierra Club, Yosemite Committee

Commenter: Alan Carlton

Kept Private: No

YO33700 WETLD: Environmental Consequences (Non-Substantive)

Correspondence Id: 5 **Comment Id:** 142394

Concern Statement: NPS should ensure that herbicides do not negatively impact surrounding ecosystems.

Comment Text: One is the plan to greatly expand the use of herbicides. Removing the invasive species is important but herbicides can spread beyond the intended location and could impact non-targeted species. What steps will be taken to insure that the herbicides do not affect the surrounding ecosystem?

Organization:

Commenter: Marsha Novak

Kept Private: No

Correspondence Id: 4 **Comment Id:** 142355

Concern Statement: NPS should avoid using herbicides in wetlands and near water.

Comment Text: It has been made clear that the NPS is considering the use of herbicides in riparian and aquatic areas. In our experience, such use has always been considered especially risky, and is normally to be avoided. In the presence of water, non-target species are more likely to be affected. And the presence of water makes it impossible to control unwanted transport of the herbicide. The fact that use in wetland areas is even being considered is an indication of a lack of balance in the approach to the issue of herbicide use.

Organization: Tehipite Chapter Yosemite Committee

Commenter: George Whitmore

Kept Private: No

Correspondence Id: 5 **Comment Id:** 142365

Concern Statement: NPS should ensure that herbicides do not spread to impact non-target plants and animals and surrounding ecosystems.

Comment Text: herbicides can spread beyond the intended location and could impact non-targeted species. What steps will be taken to insure that the herbicides do not affect the surrounding ecosystem? I am also concerned about the possibility of herbicides being used in riparian and aquatic areas. The presence of water could increase the chance that the applied herbicide could be spread beyond the area that is targeted. Non targeted aquatic plants and also aquatic animals and those that feed on them could be affected. How will harm to aquatic species be minimized?

Organization:

Commenter: Marsha Novak

Kept Private: No

YO35700 WLDLF: Environmental Consequences (Non-Substantive)

Correspondence Id: 5 **Comment Id:** 142365

Concern Statement: NPS should ensure that herbicides do not spread to impact non-target plants and animals and surrounding ecosystems.

Comment Text: herbicides can spread beyond the intended location and could impact non-targeted species. What steps will be taken to insure that the herbicides do not affect the surrounding ecosystem? I am also concerned about the possibility of herbicides being used in riparian and aquatic areas. The presence of water could increase the chance that the applied herbicide could be spread beyond the area that is targeted. Non targeted aquatic plants and also aquatic animals and those that feed on them could be affected.

How will harm to aquatic species be minimized?

Organization:

Commenter: Marsha Novak

Kept Private: No



Wilderness crew hand pulling *Holcus lanatus* (tan patches) in Pate Valley

Correspondence Id: 4 **Comment Id:** 142358

Concern Statement: NPS should minimize harm to aquatic species including less obvious life forms such as micro-organisms, especially endangered amphibians.

Comment Text: How can harm to aquatic species, especially endangered amphibians, be minimized? How can harm to the less obvious life forms, including micro-organisms, be minimized?

Organization: Tehipite Chapter Yosemite Committee

Commenter: George Whitmore

Kept Private: No

Correspondence Id: 4 **Comment Id:** 142355

Concern Statement: NPS should avoid using herbicides in wetlands and near water.

Comment Text: It has been made clear that the NPS is considering the use of herbicides in riparian and aquatic areas. In our experience, such use has always been considered especially risky, and is normally to be avoided. In the presence of water, non-target species are more likely to be affected. And the presence of water makes it impossible to

control unwanted transport of the herbicide. The fact that use in wetland areas is even being considered is an indication of a lack of balance in the approach to the issue of herbicide use.

Organization: Tehipite Chapter Yosemite Committee

Commenter: George Whitmore

Kept Private: No

YO36000 RTESP: Rare, Threatened, and Endangered Species (Non-Substantive)

Correspondence Id: 4 **Comment Id:** 142358

Concern Statement: NPS should minimize harm to aquatic species including less obvious life forms such as micro-organisms, especially endangered amphibians.

Comment Text: How can harm to aquatic species, especially endangered amphibians, be minimized? How can harm to the less obvious life forms, including micro-organisms, be minimized?

Organization: Tehipite Chapter Yosemite Committee

Commenter: George Whitmore

Kept Private: No

YO40500 SPECL: Monitoring Management Effects (Non-Substantive)

Correspondence Id: 4 **Comment Id:** 142396

Concern Statement: NPS should develop special protocols to evaluate and use new herbicides.

Comment Text: What special protocols are needed to evaluate and use newer herbicides in view of their lesser track record?

Organization: Tehipite Chapter Yosemite Committee

Commenter: George Whitmore

Kept Private: No

Correspondence Id: 5 **Comment Id:** 142368

Concern Statement: NPS should further evaluate agricultural herbicides prior to using them in the park.

Comment Text: Will more studies be used to evaluate the use of agricultural herbicides in a natural ecosystem before the use of a particular herbicide will be applied in the park?

Organization:

Commenter: Marsha Novak **Page:** **Paragraph:**

Kept Private: No

Correspondence Id: 4 **Comment Id:** 142360

Concern Statement: NPS should develop special protocols to evaluate and use new herbicides.

Comment Text: What special restrictions are needed on newer herbicides because of their lesser track record?

Organization: Tehipite Chapter Yosemite Committee

Commenter: George Whitmore

Kept Private: No

YO41700 SPECL-WSRA: Environmental Consequences (Non-Substantive)

Correspondence Id: 4 **Comment Id:** 142356

Concern Statement: NPS should avoid using herbicides in wetlands and near water.

Comment Text: The use of herbicides along the Merced River is especially troubling in view of the river's Wild and Scenic status. Unlike an irrigation canal which can be "sterilized" in order to control plants which may be restricting the flow of water, the Merced River is a relatively natural ecosystem. Management should strive to restore it to an even more natural state, and allowing herbicides to impact the river would not be acceptable.

Organization: Tehipite Chapter Yosemite Committee

Commenter: George Whitmore

Kept Private: No