



Appendix C: Public Comments and Responses

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Public Comments and Responses

INTRODUCTION

This report summarizes public comments submitted on the Restoration of the Mariposa Grove of Giant Sequoias Draft Environmental Impact Statement (*Mariposa Grove DEIS*). The National Park Service (NPS) released the *Mariposa Grove DEIS* for public review from March 8, 2013, through May 7, 2013.

PUBLIC COMMENT ANALYSIS METHODOLOGY

The NPS analyzed all public comments received during the comment period. All letters, emails, faxes and public meeting comments were analyzed using a database developed by the NPS known as the Planning, Environment and Public Comment (PEPC) database. Letters were analyzed in stages, with review and assessment at each stage. First, staff read each letter to determine the discrete points expressed by the author, each of which is considered a “comment.” Next, each discrete comment was assigned a code associated with a particular resource topic or element of the plan. The coding process captured discrete comments, assigned them to specific topic areas, and stored them in a database where they could be quickly accessed using a variety of query and reporting tools. Staff derived the code categories from an analysis of the range of topics covered in relevant present and past planning documents, NPS legal guidance, and the comment letters themselves. Comments that discussed multiple issues (e.g., commercial operations and transportation) were coded to multiple topics if necessary.

Comments were also 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 *Mariposa Grove DEIS*, while out-of-scope comments included those comments addressing issues unrelated to the plan. Substantive comments are those that:

- Question, with reasonable basis, the accuracy of information in the EIS
- Question, with reasonable basis, the accuracy of environmental analysis
- Develop and evaluate reasonable alternatives other than those presented in the EIS
- Cause changes to the proposal or alternatives
- Suggest factual corrections

Comments in favor of or against the proposed action or alternatives, or comments that only agree or disagree with NPS policy, were not considered substantive, according to NPS Management Policy. All comments are part of the administrative record for this project.

After staff coded all individual substantive comments and grouped those of similar context together, they developed a unique “concern statement” to summarize the main points or common themes expressed. Concern statements were identified throughout the coding process and were derived from and supported by quotes from original letters. Concern statements are intended to help guide the reader to comments on the specific topics of interest and 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 letters and the coded comment database.

The concern statements were screened to determine whether further clarification is needed in the EIS, or whether modification of the proposed action is necessary. In the latter case, concerns were brought forward to park management for further deliberation. As a result of this deliberation, substantive comments led to changes in the Restoration of the Mariposa Grove of Giant Sequoias Final Environmental Impact Statement (*Mariposa Grove FEIS*). The NPS responses to the concern statements in this appendix detail these changes and/or points to sections of the FEIS for further information or clarification. Some responses provide background or relevant information that address the comment. Some responses explain why comments were considered but ultimately dismissed from further analysis.

RESULTS OF PUBLIC COMMENT ANALYSIS

During the 60-day public comment period, the park received 334 public comment correspondences concerning the Mariposa Grove plan. One comment letter was from a state agency, five were from organizations, one business, and the remainder originated from unaffiliated individuals, including form letters (see table below). The analysis of correspondence identified 356 discrete comments (excluding form letters), which generated 68 substantive concern statements.

Agencies and Organizations That Sent Correspondence

Federal and State Agencies	California State Clearinghouse and Planning Unit U.S. Army Corps of Engineers
Organizations	Extinction Witness National Parks and Conservation Association Yosemite/Mariposa County Tourism Bureau Central Sierra Environmental Resource Center (CSERC) Yosemite Sierra Visitors Bureau
Businesses	Delaware North Companies Parks & Resorts at Yosemite, Inc.

The majority of comments received during the public comment period were statements of support for Alternative 2 (Preferred Alternative) (271 correspondences), or statements of support for restoration efforts in Mariposa Grove (239 correspondences). Correspondence also reflected concern about access to the upper Grove area for specific users including people with disabilities, the elderly, or young children (24 correspondences). There were 17 correspondences that asked the NPS to consider alternatives to the current tram system in the upper Grove area.

Number of Comments Received by Code

Code	Description	Number of Correspondences That Include Specified Code
MG0100	Alt 2 Support	271
MG0106	General Support for Grove Restoration – No Alternative Specified	239
MG6350	Transportation – Tram Access to Upper Grove	26
MG10100	Commercial Operations – Tram	21
MG6100	Transportation – Circulation and Crowding	11
MG0104	Alt 4 Support	10
MG10200	Commercial Operations – Gift Shop	9
MG6000	Transportation	8

Code	Description	Number of Correspondences That Include Specified Code
MG0101	Alt 2 Oppose	8
MG4000	Visitor Facilities	7
MG8100	ADA – Parking/Access/Trails	7
MG1010	Policy and Other Planning	6
MG6600	Transportation – Parking – Other Options	6
MG0001	EIS Document/Participation	6
MG3000	Potential Impacts on Wetlands	5
MG4100	Visitor Facilities – Restrooms/Septic System	5
MG2100	Restoration/Stewardship – Giant Sequoia Habitat	5
MG4400	Visitor Facilities – Trails	4
MG7500	Socioeconomic or Cost Analysis	4
MG6300	Transportation – Shuttles	4
MG7000	Signage and Wayfinding	4
MG0103	Alt 3 Oppose	4
MG6500	Transportation – Parking Lot in the Lower Grove	3
MG6400	Transportation – Parking Lot at the South Entrance	3
MG2300	Restoration/Stewardship – Prescribed Burning	3
MG2000	Restoration/Stewardship	2
MG7010	Soundscape	2
MG2200	Restoration/Stewardship – Techniques	2
MG2400	Restoration/Stewardship – Cultural Resources	2
MG7700	Cumulative Impacts	2
MG3100	Potential Impacts on Wildlife/Habitat	2
MG1000	Purpose and Need	2
MG4500	Visitor Facilities – Communications	1
MG8000	ADA Compliance	1
MG4300	Visitor Facilities – Utility Lines	1
MG0105	Alt 4 Oppose	1
MG0102	Alt 3 Support	1
MG0010	Alt 1 Support	1

USING THIS REPORT

This report presents the public concerns organized by topic, along with “representative quotes,” which are verbatim excerpts from individual public comment letters. These supporting quotes are followed by information as to whether the comment author was an individual, organization (with a general description of the organization type), agency, or American Indian tribe or group, and the assigned letter number.

Concerns that were considered substantive include a response from the project team. Substantive concerns and responses are listed first under each topic, followed by non-substantive concerns. Responses are not provided for non-substantive concerns (e.g., comments that oppose the proposed action but do not provide a substantive rationale, comments that do not meet the requirements listed above).

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RESPONSES TO COMMENTS

MG0001 – EIS Document/Participation

Concern ID: 46361

CONCERN STATEMENT: The National Park Service should improve the EIS by reconciling differences between the executive summary and Chapter 3, strengthening the analysis of beneficial impacts, and clarifying the meaning of the No Action alternative.

Representative Quote(s): **Corr. ID:** 93 **Organization:** *Not Specified*

Comment ID: 321060 **Organization Type:** Unaffiliated Individual

Representative Quote: While comparing the impacts presented in the executive summary for each alternative with the impacts presented in Chapter 3, it seemed that the results didn't align perfectly. This may be due to the fact that the impacts were being summarized, and therefore couldn't capture the complexity of the results. If this is the case, please clarify in the ES [Executive Summary] of the FEIS.

Corr. ID: 93 **Organization:** *Not Specified*

Comment ID: 321061 **Organization Type:** Unaffiliated Individual

Representative Quote: The discussion of the significance of the impacts only discusses adverse impacts. There is no discussion, specifically, of "long-term major beneficial" impacts associated. Please clarify in FEIS.

Corr. ID: 331 **Organization:** *Not Specified*

Comment ID: 321330 **Organization Type:** Unaffiliated Individual

Representative Quote: The phrase "no action" is confusing as the NPS has taken and will take actions that affect access to the Mariposa Grove and facilities within the planning area to keep in compliance with various State and Federal laws (e.g. health and safety, historic preservation, etc.). So why not clarify what "no action" really means?

Corr. ID: 331 **Organization:** *Not Specified*

Comment ID: 321329 **Organization Type:** Unaffiliated Individual

Representative Quote: Why not clarify that the public does not have to choose between the alternatives but can propose a hybrid alternative?

Response: During the preparation of the FEIS, the document was edited and reviewed for clarity, readability, and consistency. Beneficial impacts are discussed by resource topic throughout Chapter 3, which includes assessment of the reduction of impermeable surfaces within the Grove as part of the restoration of giant sequoia habitat and improved hydrologic connectivity. Each resource area addressed in Chapter 3 includes a specific section on "Restoration-related Impacts."

Assessment of No Action alternative is a requirement under the National Environmental Policy Act. In this context, "no action" typically means no action related to the undertaking that comprises the proposed project. Under the No Action Alternative, or Alternative 1 in the EIS document, compliance with regulatory requirements, current management strategies, and strategies in current and future adopted plans would be implemented, as described in Chapter 2. Routine maintenance and repairs that are standard practice, or monitoring and reporting required under other federal

regulatory frameworks, are examples of activities that would continue under the No Action Alternative.

A Preferred Alternative is identified in Chapter 2 of the DEIS as Alternative 2, the South Entrance hub. However, the NPS would be able to select any one of the alternatives, or possibly a combination of alternatives based on the analysis of impacts, in order to select the course of action that best meets the purpose and need of the project while minimizing adverse impacts to the extent practicable.

Concern ID: 46362

CONCERN STATEMENT: The National Park Service should clarify how funding sources influenced the planning process.

Representative Quote(s): Corr. ID: 331

Comment ID: 321340

Representative Quote: What influence did the source for the funding of the proposed improvements in the Mariposa Grove have on the planning process?

Response: The planning process for the restoration of Mariposa Grove is driven by NPS objectives established through the General Management Plan (GMP) for Yosemite National Park and subsequent NPS decisions. Implementation of the proposed improvements to the Mariposa Grove would be funded by a variety of sources including the NPS, the Federal Highways Administration, private donors, and grants pursued by NPS and/or via park partners.

MG1000 – Purpose and Need

Concern ID: 46336

CONCERN STATEMENT: The National Park Service should consider maximizing or enabling public recreational access to be the primary goal for its actions in Mariposa Grove.

Representative Quote(s): Corr. ID: 92 **Organization:** Not Specified

Comment ID: 321058 **Organization Type:** Unaffiliated Individual

Representative Quote: Yes conservation is one of the goals of the NPS, but I believe the bigger goal / mission of the NPS is to enable and not limit access: this is why we call it a park versus a federally protected forest.

Response: The NPS developed the alternatives considered in the FEIS in accordance with public laws, treaties, proclamations, executive orders, regulations, and directives of the Secretary of the Interior and the Assistant Secretary for Fish and Wildlife and Parks. The NPS Organic Act, passed by the U.S. Congress in 1916, provides fundamental management direction for all units of the National Park System. The Organic Act requires that NPS “shall promote and regulate the use of...national parks...by such means and measures as conform to the fundamental purpose of the said parks...which purpose is to conserve the scenery and natural and historic objects and the wildlife therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations.” Fragile ecosystems such as that of the giant sequoia warrant special care if the groves are to survive and thrive.

Congress amended the Organic Act with the 1970 General Authorities Act, which affirms that all of the nation's parks—whether they include natural, cultural, or historic resources—are united under the mission, purpose, and protection of the Organic Act. The 1978 Redwood National Park Expansion Act also amended the Organic Act, re-affirming the mandate and directing the NPS to manage park lands in a manner that would not degrade park values. In addition, federal management decisions must be consistent with national laws, including the National Environmental Policy Act, National Historic Preservation Act, the Endangered Species Act, and the Clean Water Act.

MG1010 – Policy and Other Planning

Concern ID: 46273

CONCERN STATEMENT: The National Park Service should clarify the relationship between the GMP, Yosemite Grant, and Mariposa Grove proposal concerning the retention of facilities, level of visitation, and reduction of private vehicles.

Representative Quote(s): **Corr. ID:** 110 **Organization:** *Not Specified*

Comment ID: 321193 **Organization Type:** Unaffiliated Individual

Representative Quote: After nearly 150 years since the Grove and Yosemite Valley were removed from the public domain and reserved for “public use, resort and recreation, inalienable for all time”, now the NPS is violating those express conditions of the Yosemite Grant and limiting the public's access to this unique grove of trees.

Corr. ID: 331 **Organization:** *Not Specified*

Comment ID: 321361 **Organization Type:** Unaffiliated Individual

Representative Quote: I request that the NPS postpone a Record of Decision regarding the Mariposa Grove plan until the MRP has been adopted and the amendments to the GMP made public. When those actions have been accomplished, the NPS should release an addendum to the draft Mariposa Grove plan indicating how those actions will affect or not affect the various alternatives outlined in the draft Mariposa Grove DEIS.

Response: A new section was added to Chapter 1 of the FEIS to address Interrelationships with Other Plans and Policies. A new appendix (Appendix A) details the amendments that would be made to the GMP if the preferred alternative is selected.

MG10100 – Commercial Operations – Tram**Concern ID:** 46277

CONCERN STATEMENT: The National Park Service should consider alternatives to current tram operations that would still allow access, including:

- Wheelchair/scooter rental
- Reduced tram service (limited hours)
- Aerial tram (like a gondola)
- Compressed natural gas vehicles
- Repaved road
- Electric vehicles
- Horse and wagons
- Golf carts
- Narrower vehicles (less likely to impact trees or pedestrians)
- More than one operator(to promote competition)

Representative Quote(s): **Corr. ID:** 44 **Organization:** Yosemite Conservancy

Comment ID: 320534 **Organization Type:** Unaffiliated Individual

Representative Quote: Throughout the park, transportation is converting to electronic vehicles, which are much quieter. Why cannot the trams be the same? This would still allow people to visit, while drastically reducing noise. Why can the trams not run less frequently? Again, less noise, since that seems to be your primary concern.

I urge you to come up with a constructive solution that takes all variables into consideration, and does not basically close Mariposa Grove to all but hardy hikers.

Corr. ID: 85 **Organization:** *Not specified*

Comment ID: 321035 **Organization Type:** Unaffiliated Individual

Representative Quote: Suggestion:

To limit the noise and distraction of the tram, I would like to suggest this new invention..... electric vehicles. No noise, no pollution, no problems. There are porous surfaces that could help with water permeation. If the roadbed is the problem, then consider a raised roadbed across critical terrain.

Response: The NPS considered a range of access options to the upper Grove in the development of the alternatives. Prime considerations were the health and integrity of the trees and other ecological resources, site constraints such as the steepness of the grade, ways to maintain or improve the visitor experience, and safety. The NPS considered all of the suggestions identified in public comments. Access options not included in the final set of alternatives were not carried forward because of safety considerations due to the co-location of vehicles and pedestrians on the roadway (which would be narrowed as part of the restoration actions) or cost to purchase, operate, or maintain new vehicle types. Alternative 4 includes the option of less frequent tram service.

Concern ID: 46278

CONCERN STATEMENT: The National Park Service should consider the beneficial impacts of the tram tour, including the interpretive value of the audio tour and the safety net that trams provide for visitors who require assistance descending from the upper Grove area.

Representative Quote(s): **Corr. ID:** 3 **Organization:** Private Citizen

Comment ID: 322033 **Organization Type:** Unaffiliated Individual

Representative Quote: The tram ride through the Mariposa Grove helped explain the Mariposa Grove to me in a way that otherwise, I would not have truly appreciated the Grove as much as I do now.

If at all possible, please keep the tram.

Corr. ID: 43 **Organization:** *Not Specified*

Comment ID: 320533 **Organization Type:** Unaffiliated Individual

Representative Quote: As a tram driver/tour guide in the Mariposa grove I think you're making a very big mistake by removing the tram tours. My passengers are always telling me how great they are, they can see so much more than if they were hiking, PLUS they get to learn about the history of the area. We take almost full loads every trip. What really needs to be done is to repave the tram road. That's what passengers hate about the ride. It's a giant pothole with a few smooth spots thrown in. Don't deprive tourists the chance to see and learn about the most beautiful place in the world.

Corr. ID: 98 **Organization:** *Not Specified*

Comment ID: 322034 **Organization Type:** Unaffiliated Individual

Representative Quote: In the Mariposa Grove, the current arrangement was put in place, which I have found to be a reasonable situation. One can ride the tram. To see the view from Wawona Point, you can get out when the tram stops at the site of the fallen tunnel tree, and walk out to the Point and back. Then there is the very nice foot trail down through the forest to the Museum, which is the part of the grove that I have enjoyed the most.

Response: The effect of the tram removal on the visitors who use it is acknowledged in Chapter 3 under Sociocultural Resources: Visitor Experience and Recreation. The analysis was revised to recognize the various contributions of the tram service to the visitor experience, including the interpretive features of the tram tour and the one-way option for hikers.

MG10200 – Commercial Operations – Gift Shop**Concern ID:** 46376**CONCERN STATEMENT:** The National Park Service should continue to provide all or some of the services of the gift shop.**Representative Quote(s):** **Corr. ID:** 88 **Organization:** *Not Specified***Comment ID:** 321045 **Organization Type:** Unaffiliated Individual

Representative Quote: Also, by removing the operations(Kiosk and Gift Shop)unprepared visitors are totally without necessary items and information. The concession staff is very knowledgeable and is there from 7am to 7pm daily at the peak of the summer season. We not only sell water and tours, we also call 911(bee stings, broken legs, low sugar, heart attacks, lost person, etc) and also give directions on how to see the Grove, Park or how to get to the Bay Area.

Corr. ID: 103 **Organization:** Delaware North Companies Parks and Resorts**Comment ID:** 321126 **Organization Type:** Business

Representative Quote: The gift shop supports visitor activities within the Grove by offering supplies that visitors may not have brought with them such as rain jackets for inclement weather or water and snacks. Given the heat, elevation and extensive trail system, it is appropriate for visitors to be able to purchase a drink or food before or after their trip to the Grove. Another benefit from the gift shop is that it provides a personal contact with visitors during the early and late weeks of the season before NPS staff is present.... The Grove and South Entrance are relatively isolated from other visitor services and it appears that retail and food/beverage offerings at a new visitor hub are an appropriate and necessary visitor service. All these factors should have been discussed in the analysis of the Plan and in the development of alternatives, yet they were not.

Corr. ID: 103 **Organization:** Delaware North Companies Parks and Resorts**Comment ID:** 322036 **Organization Type:** Unaffiliated Individual

Representative Quote: In 2012 the gift shop sold over 29,000 beverages, 31,000 ice cream bars, 29,000 postcards, 4,400 apparel items 1,700 books and 297 maps in a 7-month period. These statistics suggest that basic beverage, snack and souvenir opportunities, as well as books and maps, are valued by many visitors to the Grove. The sales figures also suggest that a bookstore concept will not be sustainable as the retail volume will not support the staffing necessary to run the store. We believe the gift shop was not adequately described and evaluated in Chapter 3...

Response: The EIS has been revised to affirm that visitor information, educational, and other sales items would be available at the South Entrance hub under Alternatives 2 and 4. Similar services would be provided at the Grizzly Giant hub under Alternative 3.

MG2000 – Restoration/Stewardship

Concern ID: 46286

CONCERN STATEMENT: The National Park Service should completely restore the upper Grove area, including removal of all communications equipment and facilities except for a trail.

Representative Quote(s): **Corr. ID:** 76 **Organization:** *Not Specified*

Comment ID: 322027 **Organization Type:** Unaffiliated Individual

Representative Quote: I propose moving the cabin from the Upper Grove to the Lower Grove or South Entrance to continue its use as a Museum or visitor contact station. The Museum site could be restored returning the site to meadow. I would recommend signing the area especially to point out the young and adolescent sequoias that grow near the cabin.

Corr. ID: 76 **Organization:** *Not Specified*

Comment ID: 322028 **Organization Type:** Unaffiliated Individual

Representative Quote: I recommend dismantling the Station and moving it as well to the South Entrance or Lower Grove once the tours are discontinued....

I recommend moving the communications equipment. Thus the road between the Grizzly Giant to the Upper Grove can revert to a pedestrian trail only and the Upper Grove could returned to Wilderness status.

Response: Some administrative vehicular access must be provided to enable maintenance of the communication facilities at Wawona Point. The Wawona Point communications tower is a critical component of the park-wide communications network. The tower requires maintenance throughout the year, and must be accessible to service vehicles. The NPS reviewed alternative sites for tower relocation, but the only suitable locations were within Wilderness. Relocation costs would be prohibitive, possibly exceeding several million dollars. The NPS also considered alternative power supplies for the equipment and determined that new power transmission lines would cross designated wilderness, solar panels would be unreliable in the winter due to snow cover, and delivery of propane via other transportation modes (e.g., helicopter) during winter months would require extensive site preparation and would be expensive and unreliable during inclement weather. Because the communications tower and the current fueling system could not reasonably be relocated or replaced at this time, “full” restoration benefits at Wawona Point could not be realized. Should the telecommunications tower become obsolete due to technological advances, the NPS would consider removal of the equipment. The Museum is a historic building and will remain because of its association with the location of Galen Clark’s first cabin in the Grove.

Concern ID: 46287

CONCERN STATEMENT: When necessary to remove large trees, the National Park Service should leave them in the forest for trail closure, restoration, or habitat enhancement.

Representative Quote(s): **Corr. ID:** 109 **Organization:** *Not Specified*

Comment ID: 321189 **Organization Type:** Unaffiliated Individual

Representative Quote: I also think that removing large trees from the forest, as logs, as I saw happening at the upper grove in April is a mistake. The could be applied to the landscape as large woody debri for trail closure, riparian restoration, or general habitat enhancement. Also disturbing, are all the stumps along the outer loop trail, south of the upper grove. Perhaps managers could be less zealous about felling so-called hazard trees. If it is necessary to remove trees, they should be blasted or shaped to simulate natural mechanisms, and left tall enough (20'-50') to provide snag habitat.

Response: Under the Mariposa Grove EIS, trees would be removed as a part of construction activities, particularly out of the Mariposa Grove at the South Entrance where the parking lot would be expanded. The NPS will explore sustainable options for trees that would be removed, including re-use of trees as site furnishings, trail delineators, and stockpile for future use. Trees would also be removed as part of efforts to reduce fuel loading and fire hazards in the Grove, per the Fire Management Plan. Trees could be mechanically thinned in restoration areas as well to meet fire management goals.

MG2100 – Restoration/Stewardship – Giant Sequoia Habitat

Concern ID: 46288

CONCERN STATEMENT: The National Park Service should accelerate the realignment of the road at the entrance to the lower Grove area.

Representative Quote(s): Corr. ID: 76 **Organization:** Not Specified

Comment ID: 320589 **Organization Type:** Unaffiliated Individual

Representative Quote: The proposal in the Preferred Alternative to realign the road at the entrance to the Lower Grove should be accelerated to reroute the road so that it does not cut through the ravine and does not pass close to the sequoias.

Response: The timing of the road realignment at the entrance to the lower Grove area is contingent upon funding availability and the completion of the design and regulatory compliance activities.

Concern ID: 46289

CONCERN STATEMENT: The National Park Service should consider other options to the realignment of the road at the entrance to the lower Grove area to avoid creating new impacts to the giant sequoias.

Representative Quote(s): Corr. ID: 83 **Organization:** CSERC

Comment ID: 321016 **Organization Type:** Conservation/Preservation

Representative Quote: Realigning the road is not the only option for protecting the giant Sequoias from erosion in the drainage. Engineering an appropriate crossing and restoring the ravine would sufficiently protect the previously impacted Sequoias without introducing new impacts to Sequoias by realigning the road.

The minimal benefit of the road realignment should be carefully compared with having such an impact on the Giant Sequoias.

Response: A primary benefit of realigning the curve at the entrance to the Grove would be long-term protection of the giant sequoia growing along the ravine. Introduction of a straightened curve and a new engineered crossing would be intended to slow erosion in the ravine, where giant sequoia are rooted, and reduce soil compaction of the local root zone that is associated with vehicle traffic on the paved roadway.

Concern ID: 46290

CONCERN STATEMENT: The National Park Service should not overstate the benefits of the removal of paved roads to the giant sequoias.

Representative Quote(s): Corr. ID: 83 Organization: CSERC

Comment ID: 321022 **Organization Type:** Conservation/Preservation

Representative Quote: While it is a step in the appropriate direction to convert a portion of the Upper Grove loop road to a trail, the Park should not overstate the benefit to the Giant Sequoia from this action. Having a hard packed trail, regardless of its width, is still going to impact the roots to some degree. Water will be better able to infiltrate the soil, but the structure and composition of a healthy forest soil will still be absent. It is certainly beneficial to remove the asphalt and allow the trees to continue to grow. However, only complete removal, decompaction and restoration of the road would fully relieve the roots of the Sequoia from the stress caused by having a hardened surface on top of them.

Corr. ID: 104 **Organization:** *Not Specified*

Comment ID: 321136 **Organization Type:** Unaffiliated Individual

Representative Quote: If the Mariposa redwoods are anything like my redwood was, by now the roots have thoroughly adapted. Be removing the paved surface and realigning water flows, you will most likely incur hardship on the trees by forcing them to readjust to your modifications.

Corr. ID: 110 **Organization:** *Not Specified*

Comment ID: 321195 **Organization Type:** Unaffiliated Individual

Representative Quote: The issue of removing paved roads in the grove to improve infiltration of rainfall and snowmelt is misleading. The majority of the water that the trees have access to is underground water. If it were only rainfall and snowmelt, the trees would not have survived all these years.

Response: Each alternative includes a mix of reduction of developed areas and new development, as described in Table 2-3. As discussed in Chapter 1 (page 1-7 of the DEIS), the primary purpose of the proposed actions in Mariposa Grove is to address the conditions that are contributing to stress on the giant sequoias, which includes the alteration of natural systems. The removal of pavement and narrowing of roads to be converted to pedestrian trails would support that aspect of the restoration. Limiting paved road and vehicle access also is compatible with the natural soundscape of the upper Grove area. The effects of pavement removal are described in Chapter 3 for many resource topics under the subheading for “Restoration-related Impacts.”

Concern ID: 46463

CONCERN STATEMENT: The National Park Service should consider the presence and assistance of Delaware North concessioner employees as part of the strategy to minimize damage to the Mariposa Grove.

Representative Quote(s): **Corr. ID:** 336 **Organization:** *Not Specified*

Comment ID: 321699 **Organization Type:** Unaffiliated Individual

Representative Quote: The importance of Delaware North's large number of employees in the grove has been ignored. Plans to increase parking and help get more pedestrians into the grove, without uniformed employees (NPS or DNC) will be damaging to the trees and natural beauty. There is not enough N.P.S. coverage in any of the plans to prevent damage to the grove. We are constantly radioing Wawona rangers. It's already a problem getting someone up there to give the guest guidance.

Response: It is acknowledged in Chapter 3 of the FEIS that concessioner employees support traffic management in Mariposa Grove and other visitor assistance. Under all the action alternatives, NPS will continue to provide for traffic management staffing as needed.

MG2200 – Restoration/Stewardship – Techniques

Concern ID: 46280

CONCERN STATEMENT: The National Park Service should consider alternatives to some machinery and materials use, such as using excavators instead of bulldozers and skid steers, and using sustainable pavement instead of asphalt.

Representative Quote(s): **Corr. ID:** 57 **Organization:** *Not Specified*

Comment ID: 320556 **Organization Type:** Unaffiliated Individual

Representative Quote: Bulldozers and skid steers both have fixed ripping implements attached to them (Archuleta and Baxter 2008). This can create the potential for the equipment to re-compact the soil surface that they have just treated when positioning to treat part of the area that was not reached during the previous pass (Archuleta and Baxter 2008). This could limit the effectiveness of the mechanical treatment by destroying soil macropores and therefore decreasing water movement, decreasing soil aeration, and restricting root growth (Archuleta and Baxter 2008).

I would suggest that the NPS analyzes the potential of other heavy equipment types for this project. Excavators are now being used as multipurpose subsoiling machines. United States Forest Service personnel from the Umpqua National Forest have developed implements for excavators that allow these machines to accomplish multiple tasks (Archuleta and Baxter 2008). These implements allow excavators to subsoil while spreading organic matter over the project site (Archuleta and Baxter 2008). Subsoiling followed by the addition of organic matter has been shown to drastically increase water infiltration and reduce erosion potential (Luce 1997). An excavator could also be used to contour areas of the project that require it (Lloyd et al. 2013). The use of an excavator with a multipurpose implement could decrease the time involved with restoring these areas, lessening the potential for these treated

areas to experience runoff, and increase belowground productivity (Archuleta and Baxter 2008, Lloyd et al. 2013, Luce 1997).

Corr. ID: 105 **Organization:** *Not Specified*

Comment ID: 321144 **Organization Type:** Unaffiliated Individual

Representative Quote: I think it is important to consider the environmental damage that asphalt and petroleum products cause to the natural ecosystem. Research sustainable pavement alternatives currently available for road and trail repair and consider replacing all asphalt surfaces with context sensitive pavement materials that will limit the visual impacts of trails, paths and roads.

Response: The NPS welcomes suggestions for new and improved restoration techniques and methods, and will consider the recommendations in this comment letter as site-specific restoration is implemented. The NPS will use best management practices during construction and installation of new facilities. See Appendix E, Mitigation Measures, and Appendix D , Restoration Plan.

MG2300 – Restoration/Stewardship – Prescribed Burning

Concern ID: 46281

CONCERN STATEMENT: The National Park Service should discuss fire in more detail in the EIS, specifically – Future multi-year schedule for prescribed burns, cooperative efforts for fuel treatment coordinated with the Forest Service, gap dynamics and prescribed fire in relation to giant sequoia establishment and growth, the significance of the fire return interval departure rating of 4, and the benefits of fire smoke.

Representative Quote(s): **Corr. ID:** 57 **Organization:** *Not Specified*

Comment ID: 320555 **Organization Type:** Unaffiliated Individual

Representative Quote: Though some restoration activities such as wetland restoration, soil preparation and removal of infrastructure are discussed at length, fire is not....Although fire has now been reintroduced, these prescribed fires are still not meeting the historic return interval of 3 to 15 years.... The multi-year prescribed fire schedule listed in appendix six of the Fire Management Plan only forecasts to 2009, more recent information on prescribed fire in the Mariposa Grove would be beneficial to the DEIS (NPS 2004).

In Appendix C: restoration plan, the NPS states that conducting prescribed fires and fuel treatments outside of the Mariposa Grove is a priority (NPS 2013). The appendix also mentions that some of the areas targeted for treatment include lands managed by the United States Forest Service (NPS 2013). None of the alternatives mention any cooperative efforts to coordinate with the United States Forest Service to accomplish this priority.

This DEIS seems to focus mainly on the restoration of wetland areas of the Mariposa Grove. Studies from Kings Canyon National Park, California have shown that tree height and continued growth after establishment is more dependent on light availability in burned areas than moisture (Shellhammer and Shellhammer 2006). Gap dynamics and prescribed fire use don't seem to be sufficiently discussed in relation to giant sequoia establishment and growth within the DEIS.

Corr. ID: 331 **Organization:** *Not Specified*

Comment ID: 321348 **Organization Type:** Unaffiliated Individual

Representative Quote: What is the significance of a fire return interval departure (FRID) rating of 4? What are the scale parameters? What benefits can be achieved from forest fire smoke emissions?

Response: The role of fire in ecological restoration is described in Chapter 1 as part of the goals and objectives for ecological restoration. Fire management activities are also discussed in Chapter 3, Natural Resources: Vegetation. The NPS concurs that gap dynamics and light availability are essential components of healthy ecosystems in the Mariposa Grove area. The FEIS defers to the 2004 “Final Yosemite Fire Management Plan” and the “Operational Fire Management Plan” for more detailed and up-to-date descriptions of the interaction of fire and the specific communities in the south end of Yosemite (Appendix B). Appendix B also summarizes the U.S. Forest Service fuels reduction and forests rehabilitation projects in adjacent lands to Yosemite.

MG2400 – Restoration/Stewardship – Cultural Resources

Concern ID: 46939

CONCERN STATEMENT: The National Park Service should carefully consider the use of the museum building as a historic structure to reduce deterioration and for visitors to ponder the setting that Galin Clark so much enjoyed.

Representative Quote(s): **Corr. ID:** 76 **Organization:** *Not Specified*

Comment ID: 320584 **Organization Type:** Unaffiliated Individual

Representative Quote: 3. What to do with Clark’s Cabin/Museum? The proposed usage to repurpose the building as a hiker’s shelter doesn’t make any sense. Left unsupervised it will be subject to vandalism or perhaps worse. The building itself is fragile (especially the roof) and if left unmaintained over time it will decay and become a nuisance eventually requiring its removal. I propose moving the cabin from the Upper Grove to the Lower Grove or South Entrance to continue its use as a Museum or visitor contact station. The Museum site could be restored returning the site to meadow. I would recommend signing the area especially to point out the young and adolescent sequoias that grow near the cabin.

Corr. ID: 99 **Organization:** *Not Specified*

Comment ID: 321081 **Organization Type:** Unaffiliated Individual

Representative Quote: The Mariposa Grove Museum is a great example of National Park Rustic Architecture. Also, the museum offers a historical connection with the grove that a contact center located at the entrance could not. Many photos have been taken of this historic structure along with fellow travelers that allows a more personal connection to the grove. If the building were repurposed, there is a great potential for delay which will likely lead to deterioration and eventual removal of the structure.

Response: Under Alternative 2, the museum structure is proposed to remain in place, although the function of the building would change. The Mariposa Grove museum building has been individually listed in the National Register since 1978, and it is described as a contributing feature of the Mariposa Grove Historic District in Chapter 3 of the EIS (see DEIS page 3-95 through 3-99.) The potential impacts related to a change in function of the museum building are addressed on DEIS

page 3-109. No physical alteration of the building is planned in order to preserve the integrity of the building. Any actions affecting the building would comply with the Secretary of the Interior's Standards for the Treatment of Historic Properties. The NPS would continue to maintain this structure to prevent deterioration, regardless of its use.

Concern ID: 46954

CONCERN STATEMENT: The National Park Service should consider a balance between accessibility and historic considerations.

Representative Quote(s): Corr. ID: 99

Comment ID: 321077

Representative Quote: Since there will be a new comfort station at the South Entrance Hub that would be ADA accessible, I would like to see any accessibility improvements to the current comfort station be abandoned. The current comfort station would then retain it's historical look and significance to the area.

Response: As discussed in the cultural resources section of Chapter 3 (beginning on page 3-93 of the DEIS), balancing cultural/historic resources, natural resources, and visitor use has long been the goal of management decisions in the Mariposa Grove. Future activities in Yosemite National Park must be in compliance with *Architectural Barriers Act Accessibility Standards for Federal Facilities* (GSA 2006), *The Secretary of the Interior's Standards for the Treatment of Historic Properties* (NPS 1995), Director's Order 42: *Accessibility for Visitors with Disabilities in National Park Service Programs and Services* (NPS 2000a), and other applicable guidance.

MG3000 – Potential Impacts on Wetlands

Concern ID: 46284

CONCERN STATEMENT: The National Park Service should move trails, converted roads, and new facilities outside of wetlands and stream corridors such as, the trail that cuts through the Rattlesnake Creek meadow and the facilities at the South Entrance.

Representative Quote(s): Corr. ID: 109 **Organization:** Not Specified

Comment ID: 321183 **Organization Type:** Unaffiliated Individual

Representative Quote: Conversion of existing roads within a wetland and stream corridor to a raised accessible trail is counter productive to ecological restoration. Instead, a conventional accessible trail could be constructed outside of the wetland to the South or North at less cost and greater restorative effect.

Response: Wetlands within the Mariposa Grove, South Entrance area, and other areas that are potentially affected by the actions proposed under the alternatives were mapped and reviewed (see Chapter 3, beginning page 3-50 of the DEIS). Throughout the process of developing the alternatives evaluated in this EIS, the goal was to avoid disturbance of wetlands. However, some impacts were determined to be unavoidable in order to accommodate visitation to the Mariposa Grove. In those cases, NPS identified additional mitigation measures that are outlined in Appendices E and F of the EIS.

Concern ID: 46285

CONCERN STATEMENT: The National Park Service should include the removal of parking, climate change, the absence of fire, and the elimination of the water line leak in wetlands discussions in the EIS.

Representative Quote(s): **Corr. ID:** 331 **Organization:** *Not Specified*

Comment ID: 321331 **Organization Type:** Unaffiliated Individual

Representative Quote: What percentage of wetland restoration would not be accomplished if the existing 115 space parking lot was not removed? What is this percentage related to? If climate change equates to a drying weather pattern, what is the likelihood that the wetlands are going to disappear anyway? What percentage of wetland loss is due to the absence of a frequent fire regime? What effect would the complete elimination of leaking water lines have on Grove health and on wetland areas?

Response: Under Alternative 2, about 1.0 acre of wetlands would be restored as a result of ecological restoration activities in the lower Grove area and removal of trails and road narrowing in the upper Grove area. Climate change may have an effect on the ecosystem that cannot be quantified at this time; however, ecological restoration of giant sequoia habitat is intended to reduce stresses on the ecosystem that may make it more resilient and adaptive to change.

As discussed in Chapter 3 (page 3-55 in the DEIS), there would be temporary minor adverse impacts in the lower Grove during removal of infrastructure and in the upper Grove during water line repair and/or replacement. The repair of leaking water pipes could have small local impacts on water tables, as it would eliminate unintended leakage. It is difficult to quantify or locate site-specific underground leaks in such a complex and large system, but overall, replacement of water lines could contribute to localized minor decreases in water levels, leading to restoration of natural water levels.

Concern ID: 46570

CONCERN STATEMENT: The National Park Service should modify the South Entrance parking to protect wetlands.

Representative Quote(s): **Corr. ID:** 83 **Organization:** CSERC

Comment ID: 322030 **Organization Type:** Conservation/Preservation

Representative Quote: The configuration of the proposed parking area at the South Entrance Hub originally proposed a design that would have resulted in paved parking overlapping a 0.24- acre wetland. As Park planning staff has already agreed, this impact is entirely unnecessary as equivalent parking could be provided North of the wetland, closer to the Mariposa Grove Road, or other design modifications could avoid the wetland.

Response: NPS has worked extensively with the design team to modify the layout for parking at the South Entrance hub to accommodate visitors and services while also minimizing impacts on wetlands and other sensitive resources under Alternatives 2 and 4. This area is subject to many constraints due to topography and environmental resource considerations. The most recent version of the design drawings (Figure 2-6) shows that the parking lot would not be constructed directly over the existing wetlands. While an improvement, the NPS does not want to overstate the beneficial impact of this revision, as the water supply to the wetland would likely be substantially removed, and

there would not be a large buffer between the parking lot and the buffer. The impact analysis continues to acknowledge the loss of this wetland.

MG3100 – Potential Impacts on Wildlife/Habitat

Concern ID: 46292

CONCERN STATEMENT: The National Park Service should relocate the “South Entrance to Grove Trail” to the shoulder of the Mariposa Grove Road to avoid impacts to fisher habitat.

Representative Quote(s): Corr. ID: 83 **Organization:** CSERC

Comment ID: 321013 **Organization Type:** Unaffiliated Individual

Representative Quote: A reasonable alternative to constructing the trail in its proposed location would be to modify the main Mariposa Grove road to accommodate a walking and/or bike path along the shoulder to avoid a high degree of human disturbance into critical furbearer habitat.

Response: Potential impacts on fisher habitat are addressed in Chapter 3, Natural Resources: Special-status Species. The location of the new trail would not be immediately adjacent to any known fisher dens. Wildlife biologists will be consulted prior to finalizing the design of the trail to ensure protection of fisher habitat. The U.S. Fish and Wildlife Service and NPS wildlife biologists developed the mitigation measures in the EIS, as described in Appendix E. These mitigation measures include direction that any new trail construction or re-alignment would occur during the non-denning season for fisher. The proposed trail between the South Entrance and the lower Grove would be located in a previously disturbed area since it follows an abandoned road alignment to the picnic area, and would parallel Mariposa Grove Road between the picnic area and the lower Grove area. Another reason to construct the trail is to avoid the inherent conflict between vehicles including shuttles and pedestrians walking along the road shoulder. In addition, walking along a trail that is separated from a road would enhance the hiker’s natural experience, especially when entering the Grove.

Concern ID: 46293

CONCERN STATEMENT: The National Park Service should provide a wildlife underpass at the wetlands near the South Entrance.

Representative Quote(s): Corr. ID: 109 **Organization:** Not Specified

Comment ID: 321192 **Organization Type:** Unaffiliated Individual

Representative Quote: Provide wildlife underpass at wetlands south of Park entrance.

Response: It is assumed that the commenter is referring to the delineated wetland area in the vicinity of the South Entrance kiosks that are under construction in 2013. The design of the kiosks was developed and evaluated as part of a previous permitting/compliance effort, and was not reconsidered as part of this EIS analysis. A wildlife underpass is under construction as part of this adjacent project.

MG4000 – Visitor Facilities

Concern ID: 46339

CONCERN STATEMENT: The National Park Service should consider a high line (not a zip line) so that visitors can experience the top of the tree canopy.

Representative Quote(s): **Corr. ID:** 7 **Organization:** *Not Specified*

Comment ID: 320128 **Organization Type:** Unaffiliated Individual

Representative Quote: Has anyone ever consider setting up a high line (not a zip line) in a big tree grove so that visitors can safely experience the trees at the top of the canopy?

Response: A high line type of use was considered as one of many options through the planning phase during which the alternatives were developed. It was not included in the alternatives that were evaluated in the EIS since it does not meet the fundamental purpose of restoration of the giant sequoia habitat.

Concern ID: 46340

CONCERN STATEMENT: The National Park Service should not eliminate stock use from the Grove.

Representative Quote(s): **Corr. ID:** 50 **Organization:** *Not Specified*

Comment ID: 320545 **Organization Type:** Unaffiliated Individual

Representative Quote: Please do not eliminate stock use from the grove. Now that I'm older I enjoy so much riding from Fish Camp to Biledo through the grove. There are MANY other riders who feel the same way. We obey the rules and stay on the outer loop.

Response: Existing equestrian trails would not be impacted by the project.

Concern ID: 46341

CONCERN STATEMENT: The National Park Service should have more logs or benches for people with mobility concerns and people who want to meditate among the giant trees.

Representative Quote(s): **Corr. ID:** 85 **Organization:** Yosemite Conservancy

Comment ID: 321034 **Organization Type:** Unaffiliated Individual

Representative Quote: In the past, I have been able to take the tram to the top, and then, using canes, slowly walk down the trails among the grove. It renews the spirit to be able to stop and meditate amongst the old giants. (Can I suggest more logs or benches to sit upon and rest?)

Response: Under the action alternatives, the design includes additional accessible trails are proposed in the lower Grove and Grizzly Giant areas that would allow visitors of all abilities the opportunity to enjoy the beauty and tranquility of Yosemite's giant sequoia forest in a more peaceful setting than is available under current conditions. Final design will integrate benches or structures where people can rest.

Concern ID: 46346

CONCERN STATEMENT: The National Park Service should retain non-historic trails to help disperse visitors and deter new trails from being created elsewhere, if impacts can be minimized.

Representative Quote(s): Corr. ID: 109 **Organization:** *Not Specified*

Comment ID: 321188 **Organization Type:** Unaffiliated Individual

Representative Quote: Removing existing “non historic” trails from the grove may just lead to new trail forming elsewhere. If their impacts can be minimized, those trails may help disperse visitors and provide better opportunities for solitude within the grove.

Response: In accordance with the goal of restoring the giant sequoia, the NPS intends to encourage and enforce (through signage and park staff) that visitors stay on established trails. As part of the action alternatives, new and extended trails are contemplated that would expand the range of trail experiences, including additional accessible trails for those with mobility limitations, and/or improved solitude and soundscapes.

Concern ID: 46347

CONCERN STATEMENT: The National Park Service should explain the difference between visitor “typologies” and demographics.

Representative Quote(s): Corr. ID: 331 **Organization:** *Not Specified*

Comment ID: 321351 **Organization Type:** Unaffiliated Individual

Representative Quote: How does visitor “typologies” differ from visitor demographics?

Response: Visitor typologies, such as those described in Table 3-11, represent different types of visitor experiences in terms of the amount of time to be spent, mobility considerations, and preferred setting. Demographics would include the socioeconomic profiles of visitors rather than a type of visitor experience or setting.

Concern ID: 46352

CONCERN STATEMENT: The National Park Service should clarify the need for the shooting practice range.

Representative Quote(s): Corr. ID: 331 **Organization:** *Not Specified*

Comment ID: 321341 **Organization Type:** Unaffiliated Individual

Representative Quote: Regarding the shooting range, why can’t this facility be closed and rangers trained at nearby county facilities?

Response: Actions related to a shooting practice range are not included in any of the alternatives evaluated in this EIS.

Concern ID: 46368

CONCERN STATEMENT: If the museum function is moved, then the National Park Service should use the building as an overnight ski hut for cross-country skiers.

Representative Quote(s): Corr. ID: 113

Comment ID: 321202

Representative Quote: If the museum function in the Upper Grove is moved to the lower Grove or South Gate, I suggest using the building as an overnight skihut for cross-country skiers.

Response: The action alternatives include relocating the museum function but do not specify new uses beyond the requirement that any future use must be compatible with maintaining the historic attributes of the structure in accordance with applicable statutes and policy or agency guidance.

Concern ID: 46369

CONCERN STATEMENT: The National Park Service should remove the water fountain at the museum so the treatment station can be moved to the lower Grove area.

Representative Quote(s): Corr. ID: 76

Comment ID: 320586

Representative Quote: I also recommend removing the water fountain at the Museum. The proposal is silent on this; but it might be assumed since it discusses moving the water treatment unit and storage unit to the Lower Grove. The hikers can surely carry their own water. Signs can be posted at the trail head warning hikers that there is no water available in the Upper Grove. This assures that the treatment station can be moved downslope to the Lower Grove. If the water fountain stays, then the treatment facility must be maintained in the Upper Grove.

Response: The two drinking fountains in the upper Grove area are a historic feature of the Grove dating to 1931, and are contributing elements to the Mariposa Grove Historic District (see Chapter 3, Cultural Resources: Historic Structures). Removal of the fountain would adversely affect the cultural landscape. Under Alternative 2, the water supply treatment unit and storage tank currently located along the loop road would be relocated to eliminate the need for maintenance vehicle access along the southern segment of the loop road. The NPS plans to install new chlorination and water tank at the comfort station under all alternatives.

MG4100 – Visitor Facilities – Restrooms/Septic System

Concern ID: 46294

CONCERN STATEMENT: The National Park Service should move the comfort station in the upper Grove area to the lower Grove area or the South Entrance once the tram tours are discontinued.

Representative Quote(s): Corr. ID: 76 **Organization:** Not Specified

Comment ID: 320585 **Organization Type:** Unaffiliated Individual

Representative Quote: 4. Maintaining the Comfort Station in the Upper Grove is a waste of resources once the tram tours are discontinued. Hikers to the Upper Grove number in the few hundreds per day currently and not everyone uses the Comfort Station. The Comfort Station has the capacity to handle thousands of visits per day. I recommend dismantling the Station and moving it as well to the South Entrance or Lower Grove once the tours are discontinued.

If a toilet is required in the Grove then keep the current vault toilet near the old hotel site and reroute trail to the current vault toilet. This allows for elimination of the trail that currently cuts through the Rattlesnake Creek meadow and facilitates complete restoration of the meadow. Rerouting the trail should be done regardless of the disposition of the Comfort Station and vault toilet. This can be accomplished by using the road/trail.

Response: Under all action alternatives, the comfort station is retained since hikers or other visitors would be present in the upper Grove and may benefit from those existing facilities. The upper Grove area comfort station is a contributing element of the Mariposa Grove Historic District, and therefore relocation would adversely affect the District.

Concern ID: 46295

CONCERN STATEMENT: The National Park Service should locate the toilet facilities more centrally and conveniently as in Alternative 3, rather than concentrating them at one end of the Grove.

Representative Quote(s): Corr. ID: 61 **Organization:** *Not Specified*

Comment ID: 320564 **Organization Type:** Unaffiliated Individual

Representative Quote: Alternative 3 locates most toilet facilities more centrally and conveniently, instead of concentrating them at one end of the Grove?

Response: Each action alternative considers improvements to toilet facilities that would improve the amenities for visitors within the concept of each alternative. For example, Alternative 3 places the hub for visitor services at Grizzly Giant whereas Alternatives 2 and 4 place the hub at the South Entrance. However, under all alternatives there would be toilet facilities at the South Entrance, lower Grove, Grizzly Giant, and upper Grove.

Concern ID: 46296

CONCERN STATEMENT: The National Park Service should analyze the leach field at the lower Grove area to determine if it can accommodate restroom use by all the passengers from tour buses.

Representative Quote(s): Corr. ID: 83 **Organization:** CSERC

Comment ID: 321018 **Organization Type:** Conservation/Preservation

Representative Quote: Allowing tour buses under 40 feet to load and unload at the Lower Grove means that the restroom facilities at the Lower Grove will be the first opportunity for those passengers to have access to a restroom. Our Center is concerned that this may cause an unnecessary stress on the leach field in the Lower Grove.

The Park should include in its analysis whether the leach field is designed to support this kind of capacity. If the leach field is not going to be able to keep up with the influx of passengers from the shorter tour buses, the Park should request that the shorter tour buses allow their passengers a restroom break at a facility with a greater capacity.

Response: Since the DEIS was published, geotechnical and other investigations have been ongoing to continue to evaluate the feasibility of a leach field in the lower Grove and throughout the study area. The final selection of flush and/or vault fixtures would be contingent on the feasibility of the septic system and leach field based on the continuing investigation of site-specific conditions. The management of tour bus visitors would be contingent upon facility capacity and shuttle operations under Alternatives 2 and 4. This is clarified in Chapter 2 of the FEIS.

Concern ID: 46297

CONCERN STATEMENT: The National Park Service should consider the elimination of flush toilets, especially in the Grove where there would be new leach fields or sewer lines.

Representative Quote(s): Corr. ID: 109 **Organization:** *Not Specified*

Comment ID: 321185 **Organization Type:** Unaffiliated Individual

Representative Quote: I am also disturbed by the prospect of new leach fields or sewer lines in the grove, and wonder if alternatives to conventional or vault toilets have been fully considered.

Corr. ID: 332 **Organization:** *Not Specified*

Comment ID: 321380 **Organization Type:** Unaffiliated Individual

Representative Quote: To alleviate water and sewage issues, why not eliminate flush toilets altogether in the entire project?

Response: It was clarified in Chapter 2 of the FEIS that the final determination of flush or vault fixtures would be contingent on the feasibility of the septic system and leach field based on the continuing investigation of site-specific conditions. The range of options still includes installation of flush toilets, vault toilets, a set of opportunities for leach field sites, and an option to install a sewer line from the lower Grove to the South Entrance. The final determination of which types of fixtures would be based on results of the continuing geotechnical investigations and soil surveys and to ability to avoid or minimize impacts on archeological or other sensitive resources.

MG4300 – Visitor Facilities – Utility lines**Concern ID:** 46299**CONCERN STATEMENT:** The National Park Service should evaluate if enough water will be available if a 2 inch slip lining is installed in the current 4 inch water supply line.**Representative Quote(s):** Corr. ID: 32 Organization: Self**Comment ID:** 320520 **Organization Type:** Unaffiliated Individual

Representative Quote: This is in reference to Appendix C of the “Draft Environmental Impact Statement”, page C-24 & C-25 reference “Utilites”. The plan of action calls for slip lining the entire length of the water supply line, a 4 inch Cast Iron pipe, with 2” HDPE (plastic pipe). The concern with the 2 inch pipe is it sufficiently sized to carry the amount of flow, volume, necessary to supply the grove and the entrance station?

For example: The flow rate of 100ft length of 2 inch pipe is approx. 18 gallons. A 4 inch pipe of 100ft will carry 67 gallons. These rates are approximate and gathered from the Internet. Water usage, length of distribution lines, the affects of gravity, water storage, are other factors that determine pipe sizing.

Response: The EIS does not include this level of design detail in the alternatives, and this decision would be under the purview of Yosemite National Park facilities and maintenance staff. Park staff will take this comment under advisement.

MG4400 – Visitor Facilities – Trails**Concern ID:** 46942**CONCERN STATEMENT:** The National Park Service should elevate pathways above hiking surfaces to minimize off-path hiking.**Representative Quote(s):** Corr. ID: 41 Organization: BergmannDesign**Comment ID:** 320531 **Organization Type:** Unaffiliated Individual

Representative Quote: Pathways should all be elevated from the surface and off path hiking should be minimized.

Response: As discussed in Chapter 3, day use activities would continue to cause vegetation impacts in the Mariposa Grove because of the level of visitor interest in and use of Mariposa Grove. Pedestrian traffic would include direct impacts on the trails from soil compaction, erosion, and root exposure that could affect the health of giant sequoia; but much of this can be minimized through clear trail delineation. Vandalism, such as stripping off bark from giant sequoia, could continue in high-use areas, but the impact would be minimized with proper fencing, educational programs and signage, and regular management and patrols of these areas. The addition of way-finding signs and improving visitor orientation could reduce off-trail use, indirectly improving plant community composition and structure. Under Alternatives 2 and 4, accessible trails that cross wetland areas in the lower Grove would be elevated on boardwalks in sensitive locations.

Concern ID: 46946

CONCERN STATEMENT: The National Park Service should not develop a trail from the South Entrance to the lower Grove area because there is not enough demand, the trail has numerous elevation gains and losses, and it goes through old growth forest.

Representative Quote(s): Corr. ID: 89 **Organization:** *Not Specified*

Comment ID: 321046 **Organization Type:** Unaffiliated Individual

Representative Quote: Hiking trail from South Entrance to picnic area and extension thereof to Lower Grove. I seriously doubt there is enough demand for this to warrant the expenditure of funds to do this and keep it maintained.... The existing trail from the South entrance is gnarly and has numerous elevation gains and losses.... It was also mentioned that this trail goes through old growth forest which should be protected instead of having a trail built through it.

Response: The proposed trail from the South Entrance to the lower Grove under Alternatives 2 and 4 would provide an alternative way to enter the Grove from the new hub besides the shuttle. Demand for such a trail would be expected to grow due to the relocation of the hub for transportation and visitor services to the South Entrance. New disturbance would be minimized due to locating the trail along an existing road alignment and adjacent to Mariposa Grove Road.

Concern ID: 46948

CONCERN STATEMENT: The National Park Service should convert the lower portion of the upper Grove area loop road to a hiking trail as long as all the other trails remain.

Representative Quote(s): Corr. ID: 330 **Organization:** *Not Specified*

Comment ID: 321315 **Organization Type:** Unaffiliated Individual

Representative Quote: I am in favor of converting the south portion of the upper Grove loop road to a hiking trail; but I want all of the other trails in the Upper Grove to stay.

Response: Trail redundancy is being eliminated to restore sequoia habitat in Alternatives 2 and 4.

Concern ID: 46952

CONCERN STATEMENT: The National Park Service should publicize the hiking trail from Wawona to the Mariposa Grove.

Representative Quote(s): Corr. ID: 51 **Organization:** *Not Specified*

Comment ID: 320627 **Organization Type:** Unaffiliated Individual

Representative Quote: Better information and path that is currently from the tunnel tree to Wawona. 6 miles is a lot for some, but there are a lot of people who don't even know about that option.

Response: Improved signage would be included under all action alternatives. The relocation of interpretive and visitor services to the main hub under all action alternatives would be expected to make information and park staff more accessible to visitors.

MG4500 – Visitor Facilities – Communications**Concern ID:** 46950

CONCERN STATEMENT: The National Park Service should clarify whether there are other uses at the communications facility at Wawona Point in addition to park administration, why it is considered a critical link when it was not available in previous years, and whether a larger fuel storage tank could reduce the number of fueling trips.

Representative Quote(s): Corr. ID: 331 **Organization:** *Not Specified*

Comment ID: 321335 **Organization Type:** Unaffiliated Individual

Representative Quote: Regarding the communications facility at Wawona Point, is the facility only for Park administration or does it serve for other wireless uses? What did the NPS do for radio communications in the previous 50 years? Why is it now considered a critical link? Since the facility has been “recently” installed is this not an example of what can take place under the so-called “No Action Alternative?” Can a larger fuel storage tank be installed to reduce the number of fueling trips?

Response: The Wawona Point communications tower is a critical component of the park-wide communications network. The communications facility houses the radio networks, a repeater for concessioner use related to parkwide tours, and a cell tower. In addition to NPS functions, these facilities benefit park visitors by providing cellular phone service in the area. The tower requires maintenance throughout the year and must be accessible to service vehicles. The NPS reviewed alternative sites for tower relocation, and the potential locations would not be feasible, as they were located in Wilderness. Relocation costs would be prohibitive, possibly exceeding several million dollars. The NPS also considered alternative power supplies and determined that new power transmission lines would cross through Wilderness, solar panels would be unreliable in the winter due to snow cover, and delivery of propane via other transportation modes (e.g., helicopter) during winter months would require extensive site preparation and delivery would be expensive and unreliable during inclement weather. Should the telecommunications tower become obsolete due to technological advances, the NPS would consider removal of the equipment.

MG6000 – Transportation**Concern ID:** 46302

CONCERN STATEMENT: The National Park Service should eliminate all vehicles within one mile of the Grove.

Representative Quote(s): Corr. ID: 41 **Organization:** BergmannDesign

Comment ID: 320530 **Organization Type:** Unaffiliated Individual

Representative Quote: Vehicles should not be allowed within at least a mile of any of the groves.

Response: In accordance with the Organic Act of 1916, NPS pursues a balance between restoration and protection of unique resources like Mariposa Grove and public access to experience these special areas. Alternatives 2 and 4 would limit private vehicular traffic into Mariposa Grove, by relocating the main transportation and visitor services hub to South Entrance and providing shuttle services and new trail connections between South Entrance and the Grove. NPS is not able to

eliminate all vehicles within the Grove because park staff vehicles must access the Grove for maintenance and access by placarded vehicles provides additional access for visitors with limited mobility. In addition, the shuttle would not be operating during the off-season and shoulder seasons, and limited vehicular access would be permitted to the Grove during those times.

Concern ID: 46305

CONCERN STATEMENT: The National Park Service should evaluate whether a shift to more shuttle use and the road realignment would adversely affect the sense of arrival or a positive experience of the “first view” of the Grove.

Representative Quote(s): Corr. ID: 99 **Organization:** *Not Specified*

Comment ID: 321078 **Organization Type:** Unaffiliated Individual

Representative Quote: There are two aspects related to a person’s sense of arrival to the grove that I am concerned about. If you get on a shuttle at the South Entrance, how will you visually know you have arrived to the grove when you are in a crowded shuttle and not a private car? A visitor’s first view of the sequoias is currently the Sentinels, which gives one a hint of what is to come. How will the realignment of the road impact this first view?

Corr. ID: 99 **Organization:** *Not Specified*

Comment ID: 321076 **Organization Type:** Unaffiliated Individual

Representative Quote: I don’t want my first view of the park, as I drive up to the South Entrance Kiosks, to be a large parking lot and associated structures. I don’t want to feel like I am arriving at Disneyland. How well will the hub be screened from view along the 41?

Response: Under Alternatives 2 and 4, the sense of arrival would be the same for many people arriving to the Grove because over 40 percent currently arrive by shuttle bus. The NPS considered the change in the sense of arrival for those who currently arrive in private vehicles (see Chapter 3; Visitor Experience). Having only one parking lot option will reduce the stress of arriving, and the shuttle will allow visitors the time and opportunity to “shift gears.” Upon arrival in the lower Grove area, the newly opened views of the lower Grove sequoias will enhance the visitors’ sense of arrival into a much larger sequoia grove experience. Related to the arrival sequence at South Entrance, the design will ensure that there is sufficient vegetative screening to avoid looking into a parking lot, whether through natural vegetation or by new planting to screen the parking area.

Concern ID: 46307

CONCERN STATEMENT: The National Park Service should consider the trade-offs between using shuttles or private vehicles to get to the Grove in terms of congestion patterns.

Representative Quote(s): Corr. ID: 103 **Organization:** Delaware North Companies Parks and Resorts

Comment ID: 321131 **Organization Type:** Business

Representative Quote: There has been no determination of the number of people who bypass the Mariposa Grove and the addition of a parking area at the South Entrance is no guarantee of reduced crowds or traffic. The congestion may just occur at a single location and perhaps later in the day with the modest increase in parking places.

Corr. ID: 331 **Organization:** *Not Specified*

Comment ID: 321334 **Organization Type:** Unaffiliated Individual

Representative Quote: If the NPS consolidates all parking at a new parking lot near the South Entrance, what is to keep people from parking at Wawona or elsewhere and riding a bus to the Mariposa Grove location? How do you accommodate the additional visitors from other parking lots?

Corr. ID: 331 **Organization:** *Not Specified*

Comment ID: 321345 **Organization Type:** Unaffiliated Individual

Representative Quote: Where is the discussion about the weight impact on roadways of shuttle buses and tour buses versus private passenger vehicles?

Corr. ID: 331 **Organization:** *Not Specified*

Comment ID: 321346 **Organization Type:** Unaffiliated Individual

Representative Quote: Where is the discussion on the fact that buses can bring more people per hour to the Mariposa Grove than private passenger vehicles?

Where is the discussion on disbursed visitor arrival via private passenger vehicle versus concentrated visitor arrival via tour or shuttle bus? Bus passengers disgorge at one time at one location cars carry far fewer people and arrive and depart across a greater timeframe than buses.

Response: This topic is addressed in Chapter 3, Visitor Experience. The options for transportation into Mariposa Grove were evaluated in terms of the capacity each would accommodate relative to existing conditions (see for example, Table 3-12). It is possible that some visitors would be turned away on peak visitation days under all alternatives, given the high demand to visit the Grove and physical constraints on parking capacity. Pulsing currently occurs during the peak times of the day when the lower Grove lot is full and the vast majority of visitors arrive on shuttles. The addition of trails in the lower Grove, new interpretive signs, and the three-quarter mile hike to the Grizzly Giant will disperse visitors and moderate any pulsing from shuttle deliveries. A key consideration with the arrival of many people at one time (for example, on a tour bus) is the adequacy of visitor facilities such as toilets. These issues were addressed in the design of the alternatives, to make sure plumbing fixtures and septic system feasibility correspond to possible visitation levels based on bus, shuttle, and parking capacities. In the future, the NPS may need to institute a permit reservation system for commercial tour buses, if future demand exceeds the capacity of the septic system or commercial bus parking space.

Concern ID: 46310

CONCERN STATEMENT: The National Park Service should clarify how the design standard of 85% peak visitation capacity is applied in the analysis to assess parking and other topics.

Representative Quote(s): **Corr. ID:** 103 **Organization:** Delaware North Companies Parks and Resorts

Comment ID: 321135 **Organization Type:** Business

Representative Quote: The Plan mentions a design standard at 85% of peak day visitation. It is unclear to us how this standard is being applied as it is necessary for certain plan elements (parking, for example), to be designed at 100% of peak day attendance to achieve the 85% standard elsewhere.

Response: The design of parking facilities and shuttle service is guided by factors including physical constraints, minimizing impacts on sensitive resources, and availability of funding. The NPS designs are intended to accommodate the 85th percentile of visitation. Table 3-12 was clarified to show estimates of how many visitors would be accommodated by mode of arrival on a day when visitation meets the 85th percentile under all alternatives.

Concern ID: 46311

CONCERN STATEMENT: The National Park Service should clarify the reasons for increased recreational vehicle parking, and the relationship between the size of the parking lot impact area.

Representative Quote(s): Corr. ID: 331 **Organization:** *Not Specified*

Comment ID: 321324 **Organization Type:** Unaffiliated Individual

Representative Quote: Under the action alternatives it is proposed to increase RV parking to around 30 spaces. Please define what RV or oversized spaces are in relation to physical area impacted. Why the proposed increases?

Response: RV and oversized parking spaces are provided in response to visitor demand. The spaces would consolidate the vehicles that currently park in Wawona, the South Entrance, and the lower Grove whose passengers want to go to the Grove. Oversized spaces can also be managed as flexible parking areas and can be used in other capacities as needed.

Concern ID: 46314

CONCERN STATEMENT: The National Park Service should consider effects on air quality from shifting more visitors to shuttle buses from private vehicles.

Representative Quote(s): Corr. ID: 331 **Organization:** *Not Specified*

Comment ID: 321355 **Organization Type:** Unaffiliated Individual

Representative Quote: Air quality and noise associated with bus traffic appear understated.

Corr. ID: 331 **Organization:** *Not Specified*

Comment ID: 321349 **Organization Type:** Unaffiliated Individual

Representative Quote: Where is the evidence to substantiate the claim that replacing private passenger vehicle traffic with shuttle bus traffic on the access road from the South Entrance to the lower Grove would “substantially reduce vehicle emissions?” One fully loaded shuttle bus may displace about 15 cars (theoretically) but how many vehicles add up to the same emission and carbon footprint of one bus? Who decided that cars are bad and buses are good? What is the evidence to support that position?

Response: This topic is addressed in Chapter 3, Air Quality and Climate Change. Under the preferred alternative, automobile and bus emissions would be moved to the South Entrance. Under

Alternative 2, privately owned vehicle use would be reduced substantially between the South Entrance Hub and the lower Grove as privately owned vehicle access to the grove during peak and shoulder seasons would be replaced by shuttle service from a new South Entrance Hub. Consequently, exhaust and dust emissions from visitor vehicles traveling on the South Entrance to lower Grove road segment would be replaced by shuttle bus emissions, which would substantially reduce vehicle emissions along this road segment. This would reduce the exposure of Grove visitors to exhaust and dust emissions. It is unknown which technology would be used for the shuttles so the amount of emissions reduced cannot yet be determined.

MG6100 – Transportation – Circulation and Crowding

Concern ID: 46319

CONCERN STATEMENT: The National Park Service should not use roundabouts where pedestrians use intersections, to protect the safety of pedestrians.

Representative Quote(s): Corr. ID: 56 **Organization:** Not Specified

Comment ID: 320554 **Organization Type:** Unaffiliated Individual

Representative Quote: I am not a big supporter of traffic circles where there is a potential for pedestrians. I have witnessed how impatient pedestrians attempt to cut across the center, rather than going around, resulting in hazardous situations. I like the intersection concept “F” better. The transitions appear to be cleaner, and take up less space. Pedestrians need only to watch for oncoming traffic from one direction source at a time.

Response: Pedestrian safety would be considered in the design if a roundabout is selected for implementation. Possible mitigation to enhance pedestrian safety at the roundabout may include proper signage, fencing, and design of sidewalks to minimize the potential for conflicts.

Concern ID: 46320

CONCERN STATEMENT: The National Park Service should compare the crowding effects of Alternative 3, where visitors would distribute uphill and downhill, and Alternative 2, where visitors all begin from the lower Grove area.

Representative Quote(s): Corr. ID: 61

Comment ID: 320561

Representative Quote: Alternative 3 delivers customers to the Grizzly Giant area. This allows customers to distribute themselves uphill and downhill in the Grove for less concentration and a lower impact. Alternative 2 concentrates everyone at the lower grove – which is contrary to both goals.

Response: Crowding potential is assessed in Chapter 3, Visitor Experience. Visitor concentration would be affected by the layout of visitor facilities as well as capacity like parking. It is not known how visitors would disperse in Alternative 3 because the Grizzly Giant is perceived by many visitors as the primary destination in the Grove. As a result of parking so close to their destination, some may choose to not hike at all. However, it is likely that more visitors would hike to the upper Grove than current levels. This would lead to greater impacts to the resources in the less-impacted part of the Grove and would result in reduced opportunities for solitude and increased crowding in the upper Grove.

Concern ID: 46321

CONCERN STATEMENT: The National Park Service should minimize impacts on giant sequoias when determining locations for transit facilities in the lower Grove area.

Representative Quote(s): Corr. ID: 76 Organization: *Not Specified*

Comment ID: 320588 **Organization Type:** Unaffiliated Individual

Representative Quote: In the Preferred Alternative the current tram ticketing and turnaround area is to be repurposed to a small transit hub. I recommend that the turn around area be restored since it contains a number of sequoias; and that the transit hub be constructed in the area currently occupied by the snack shack/office and current shuttle bus parking area.

Response: The overall purpose of actions in Mariposa Grove is to restore and protect the giant sequoia habitat, and layouts for developed areas have been refined in order to minimize impacts on those habitats as well as archaeological resources, wetlands, and other sensitive resources.

Concern ID: 46323

CONCERN STATEMENT: The National Park Service should evaluate potential impacts on traffic congestion through analysis of parking capacity and traffic flow.

Representative Quote(s): Corr. ID: 89

Comment ID: 321048

Representative Quote: With the centralization at the South Entrance of traffic to the Grove, expanded hours will also be necessary in order to avoid congestion in the mornings. Currently the public parking lot in the Grove fills up by 9:00 a.m. in summer. With the elimination of public parking in the Grove, the start time for the shuttles should be no later than 7:30 a.m. during the peak season to better manage the flow of visitors into the Grove.

Corr. ID: 103

Comment ID: 321130

Representative Quote: During a typical day, 15-20 tour busses stop to access the Wawona shuttle. Numerous concessioner traffic attendants are also situated at the South Entrance parking, at the Grove and sometimes at Wawona. Adding this traffic control staff creates capacity in the various lots beyond their static parking capacity, which is not factored into the analysis.

Corr. ID: 331

Comment ID: 321325

Representative Quote: It is stated that the current fragmented parking causes “backtracking.” What is backtracking? How was this identified as a problem? Would this problem not also plague the proposed transit plans that the NPS wants to implement Park-wide, i.e. YARTS?

Corr. ID: 331

Comment ID: 321359

Representative Quote: The real issue is total capacity. If the current private vehicle access system is pushing crowding within the Mariposa Grove to unacceptable limits, the bus plan surely will make matters worse. Why was this not more fully analyzed in the Mariposa Grove DEIS?

Response: The goal of the project is to serve the same number of visitors that currently arrive at the Grove on a typical busy summer day. A thorough analysis was completed to determine the appropriate number of parking spaces and level of shuttle services to accommodate existing visitation. In addition to improvements to existing circulation and parking layout, potential congestion will be addressed through traffic management strategies such as the use of traffic control staff at the intersection and in the parking lot.

Congestion would also be alleviated by consolidating parking, which reduces backtracking. For clarification, an example of backtracking would include visitors coming from Yosemite Valley who arrived at the parking lot at the South Entrance, found the parking lots at the Grove and South Entrance were full, then had to travel back to Wawona to park and ride the shuttle to the Grove.

Concern ID: 46324

CONCERN STATEMENT: The National Park Service should consider congestion pricing if the implemented plan does not reduce traffic congestion.

Representative Quote(s): Corr. ID: 92 **Organization:** *Not Specified*

Comment ID: 321057 **Organization Type:** Unaffiliated Individual

Representative Quote: If it is too crowded, use congestion access pricing like they do on carpool lanes. This variable pricing can be adjusted seasonally as well as for holidays.

Response: NPS policies would not allow for determining ease of access to park resources based on the ability to pay additional fees.

Concern ID: 46729

CONCERN STATEMENT: The National Park Service should consider the potential crowding issues that would result from consolidating parking into one parking lot, funneling people into shuttle buses, and closing the tram in the upper Grove area.

Representative Quote(s): Corr. ID: 103 **Organization:** Delaware North Companies Parks and Resorts

Comment ID: 321108 **Organization Type:** Unaffiliated Individual

Representative Quote: Today, more than half of the visitation to the upper Grove comes from tram passengers. If that service is not available, we would expect far fewer people to actually observe the entire Grove. This could result in crowding and congestion at lower Grove areas such as Grizzly Giant, possibly adversely affecting natural resources and visitor experience at this popular destination

Corr. ID: 331 **Organization:** *Not Specified*

Comment ID: 321337 **Organization Type:** Unaffiliated Individual

Representative Quote: Considering the impacts on visitation to the Tuolumne Grove when the NPS cut-off private vehicle access should that experience not have been disclosed in the Mariposa Grove DEIS? The NPS is to tailor their plans around protecting visitor experience. How does funneling Mariposa Grove visitors to a single parking lot by the South Entrance and funneling people into a shuttle bus not degrade visitor experience?

Response: This topic is considered in Chapter 3, Visitor Experience. Potential congestion issues around hub locations may occur on high visitation days under all alternatives. Alternative 2 includes the possibility of a roundabout as needed to address persistent congestion issues. Currently, about 37 percent of visitors to the Grove spend at least some time in the upper Grove. Most Mariposa Grove visitors reach the upper Grove by hiking (27 percent), while about 10 percent arrive on the commercial tram service. We do not expect an overall decline in visitation to the Mariposa Grove as visitors will have a range of options for arriving at the Grove, including taking a shuttle into the Grove, or hiking in, making this a different experience than that at the Tuolumne and Merced Groves.

MG6300 – Transportation – Shuttles

Concern ID: 46328

CONCERN STATEMENT: The National Park Service should modify or enhance shuttle service with:
 -Twice-daily shuttle from Yosemite Valley to the Grove during summer months
 -Shuttles from Wawona at least once an hour that travel directly to the lower Grove area rather than stop for a transfer at South Entrance
 -Shuttle connections to North park parking
 -Longer shuttle service hours (sunrise to sunset).

Representative Quote(s): **Corr. ID:** 330 **Organization:** *Not Specified*

Comment ID: 321319 **Organization Type:** Unaffiliated Individual

Representative Quote: I am concerned about the reduction of shuttle service from Wawona.... Whatever shuttles there are from Wawona, they should fill-up remaining spaces on the shuttle at the South Entrance and then continue to the Grove.... Shuttle bus service should start much earlier than in the past (sunrise) and continue later than in the past. (sunset)

Response: Final determination of the shuttle service operations would be determined at a later time based on available funding.

MG6350 – Transportation – Tram Access to Upper Grove

Concern ID: 46329

CONCERN STATEMENT: The National Park Service should provide additional access to the upper Grove area for certain visitor populations including the elderly, people with disabilities, or families with young children.

Representative Quote(s): **Corr. ID:** 3 **Organization:** Private Citizen

Comment ID: 320124 **Organization Type:** Unaffiliated Individual

Representative Quote: If at all possible, please keep the tram. For those of us who are older, and can't hike as much as we used to -- the tram is wonderful -- and for disabled people, the tram is probably the only way for them to enjoy the majesty and splendor of the Grove.

Corr. ID: 112 **Organization:** *Not Specified*

Comment ID: 321197 **Organization Type:** Unaffiliated Individual

Representative Quote: You are eliminating the opportunities of many peoples to experience this phenomenal grove. The fact that many in our society cannot walk to the top due to altitude, health, age or any other reason should not exclude them from this grove. Yes, the bottom part of the grove is outstandingly beautiful, but the upper portion should be seen also.

Response: The overall experience in Mariposa Grove for less mobile visitors has been a key consideration throughout the development of the alternatives. Under the preferred alternative, the tram would be discontinued. A wider range of experience would be provided at the lower Grove through the restoration of conditions in that area, the development of additional trails including accessible trails, and the modification of this area into a more natural setting with fewer mechanized noise and emissions.

MG6400 – Transportation – Parking lot at the South Entrance

Concern ID: 46342

CONCERN STATEMENT: The National Park Service should configure the parking to promote circulation and access for different types of vehicles and to minimize impacts on wetlands.

Representative Quote(s): **Corr. ID:** 50 **Organization:** *Not Specified*

Comment ID: 320546 **Organization Type:** Unaffiliated Individual

Representative Quote: I have also heard that you are considering turning the snowplay area parking lot into parking for the Mariposa Grove. If you do that I hope you will consider providing good parking for horse trailers up the road then. It is a safe place where us riders can park and then enjoy the National Forest trails.

Corr. ID: 103 **Organization:** Delaware North Companies Parks and Resorts

Comment ID: 321132 **Organization Type:** Business

Representative Quote: The parking configuration shown in the Plan will be limiting as there is only space for four tour busses, the lot shows a single entry/exit location and the stalls for motor homes are head-in only, which could create traffic circulation issues.

Corr. ID: 109 **Organization:** *Not Specified*

Comment ID: 321179 **Organization Type:** Unaffiliated Individual

Representative Quote: The South Entrance Hub for visitor parking and orientation seems the most logical, but I wonder if its shape or configuration can be modified to eliminate construction impacts over an existing wetland. Also, can the paved area be broken up to maintain more forest canopy for habitat and shaded parking.

Response: Since the DEIS, further refinement to the layout of the South Entrance hub under Alternatives 2 and 4 occurred to optimize parking and avoid additional wetland areas. The revised layout is shown in the FEIS.

Approximately three spaces will be provided for tour buses to use throughout the day. The spaces are anticipated to be along the road and not be within the parking lot, thus avoiding conflicts with other vehicles. The snow play area is on U.S. Forest Service lands (see Chapter 2 for Alternatives Considered but Dismissed from Further Analysis).

Concern ID: 46345

CONCERN STATEMENT: The National Park Service should provide additional parking in the lower Grove area.

Representative Quote(s): Corr. ID: 89 **Organization:** *Not Specified*

Comment ID: 321047 **Organization Type:** Unaffiliated Individual

Representative Quote: Public parking in the Grove. The preferred alternative only allows 50 “seasonal” public parking spaces for use when the shuttles stop running for the season, and eliminates public parking in the Lower Grove the rest of the time. In addition to these “seasonal” spaces, additional year-round public parking in the Lower Grove area on a first come first serve basis could be made available on the unpaved leach field of the bathrooms. I would like to see the feasibility of this option explored by the NPS.

Corr. ID: 333 **Organization:** *Not Specified*

Comment ID: 321386 **Organization Type:** Unaffiliated Individual

Representative Quote: The bureau supports adding the parking area at South Entrance. However, this should be additional to the existing parking in the lower grove. Shuttles can ferry visitors from the south entrance to the lower grove as in the past without the obvious traffic congestion in Wawona and the necessity of vehicles going back and forth from South Entrance.

Response: Since the DEIS, the NPS has looked more closely at parking in the lower Grove under Alternatives 2 and 4. Although private vehicles that are not placarded would not be permitted to enter Mariposa Grove under those alternatives, entry would be allowed when the shuttle operation is not running. In the FEIS, the parking in the Grove when the shuttle is not operating was expanded under these alternatives to provide approximately 80 spaces in the lower Grove area and near the picnic area along Mariposa Grove Road. The final number of parking spaces would be determined during the final design stage. No changes were made to Alternative 3, since it would already provide year-round parking for private vehicles within the Grove unless the road is closed due to snow. During those times, visitors would need to walk from the South Entrance under any one of the action alternatives.

MG6600 – Transportation – Parking – Other Options**Concern ID:** 46348**CONCERN STATEMENT:** The National Park Service should consider additional parking locations beyond what is proposed in the alternatives.**Representative Quote(s):** **Corr. ID:** 73 **Organization:** *Not Specified***Comment ID:** 320578 **Organization Type:** Unaffiliated Individual**Representative Quote:** How about a big parking lot in Wawona there is lots of flat ground in Wawona and you don't have to clear out a lot of trees.**Corr. ID:** 90 **Organization:** *Not Specified***Comment ID:** 321055 **Organization Type:** Unaffiliated Individual**Representative Quote:** Put a parking lot outside YNP up the Snow Play Area Road. It's a short walk to the Grizzley Giant.**Corr. ID:** 330 **Organization:** *Not Specified***Comment ID:** 321317 **Organization Type:** Unaffiliated Individual**Representative Quote:** I am very much AGAINST the designated bus parking spaces at Wawona. If more bus parking is needed, put it elsewhere. Please consider putting them at the Snow Play area or Tenaya Hotel or the old Fish Camp Gas station area or ANYPLACE between the South Entrance and Fish Camp.**Corr. ID:** 331 **Organization:** *Not Specified***Comment ID:** 321322 **Organization Type:** Unaffiliated Individual**Representative Quote:** Considering the diversity of the origination of visitors to the Mariposa Grove would not dispersed parking lots be a more effective approach to traffic management? Both the TRP and the MRP propose a network of large parking lots to intercept visitors

Response: Since the DEIS, the NPS has considered opportunities to optimize parking while protecting sensitive resources. Locations were only considered within the study area, since NPS does not have jurisdiction outside of the park and other planning efforts are addressing other areas of the park. Alternatives 2 and 4 in the FEIS were refined to include a reconfigured parking area and additional spaces in the South Entrance and for off-season use in the lower Grove area and near the picnic area along Mariposa Grove Road.

MG7000 – Signage and Wayfinding**Concern ID:** 46306**CONCERN STATEMENT:** The National Park Service should improve signage in the Mariposa Grove.**Representative Quote(s):** **Corr. ID:** 41 **Organization:** BergmannDesign**Comment ID:** 320532 **Organization Type:** Unaffiliated Individual

Representative Quote: There should be no food or drink allowed that cannot be carried out. Sufficient warning at the trailhead about there being no drinking fountains, trash cans, etc and everything that enters the grove must leave the grove.

Corr. ID: 80 **Organization:** *Not Specified*

Comment ID: 321002 **Organization Type:** Unaffiliated Individual

Representative Quote: Please have your signs asking people to NOT walk near the Sequoia's base in more languages than English. We recently visited and the couple ahead of us seemed unaware of the signs as both went right up to the tree to take their picture touching the tree. They were not speaking English so probably did not understand the signage.

Corr. ID: 103 **Organization:** Delaware North Companies Parks and Resorts

Comment ID: 321112 **Organization Type:** Business

Representative Quote: We believe that improvements to trail way-finding, which were noted as a considerable visitor concern in public scoping, will help reduce incidents of tram-pedestrian conflicts as it will be easier for visitors to stay on the trails. Where trails cross the road, appropriate signage could help improve this situation and the reduction in tram service hours called for in Alternative 4 will further reduce the potential for adverse effects.

Response: Under all action alternatives, signage would be improved in the Mariposa Grove. This is noted under the "Actions Common to All Action Alternatives" section of Chapter 2.

Concern ID: 46313

CONCERN STATEMENT: The National Park Service should eliminate electronic signs.

Representative Quote(s): **Corr. ID:** 109

Comment ID: 321181

Representative Quote: I also think that electronic signs should be eliminated, as they are ugly, unnecessary modern contrivance that do not add value to the visitor experience.

Response: Specific signage has not been identified for Mariposa Grove at this time, however changeable message signs may be considered. Final determinations on signage would be include as part of final design activities and would be identified based on physical constraints and the objectives for signage improvements.

Concern ID: 46934

CONCERN STATEMENT: The National Park Service should mention that the 2011 new audio equipment mitigates noise through use of headphones, and clarify the percent of noise impacts from the tram versus other noise generators in the Grove.

Representative Quote(s): **Corr. ID:** 103 **Organization:** Delaware North Companies Parks and Resorts

Comment ID: 321110 **Organization Type:** Business

Representative Quote: The noise issues related to the trams' audio equipment have been addressed by the replacement of audio equipment in late summer 2011. This means that the audio is played over headsets to each visitor aboard the tram, so noise pollution from the audio equipment has been mitigated.

We believe noise issues related to the trams' diesel engines are successfully mitigated in Alternative 4 with limits on operating hours and route. The Environmental Consequences discussed in Chapter 3 concluded the soundscapes were exactly the same for all three action alternatives, suggesting that the retention of a limited tram service under Alternative 4 would have no measurable adverse impacts to the natural soundscape within the Grove as compared to the other alternatives.

Corr. ID: 331 **Organization:** *Not Specified*

Comment ID: 321328 **Organization Type:** Unaffiliated Individual

Representative Quote: What percentage of soundscape impacts are associated with the commercial tram versus the gift store generator versus the parking lot at the lower Grove?

Response: Revisions were made in the FEIS to acknowledge the impacts of vehicle type and use of headphones in mitigating noise potential from the tram. The other noise sources such as the generator and parking lot are currently concentrated in one location in the lower Grove area, unlike the commercial tram that traverses throughout the lower Grove and into the upper Grove.

MG7500 – Socioeconomic or Cost Analysis

Concern ID: 46330

CONCERN STATEMENT: The National Park Service should include the yearly maintenance costs of operating shuttles, including labor, vehicle repair, and vehicle replacement in cost estimates cited in the plan.

Representative Quote(s): **Corr. ID:** 61 **Organization:** *Not Specified*

Comment ID: 320563 **Organization Type:** Unaffiliated Individual

Representative Quote: Alternative 3 significantly reduces the need for shuttle buses to the Grove. Shuttle busses would be a year-after year YNP expense in Alternative 2.

Corr. ID: 331 **Organization:** *Not Specified*

Comment ID: 321354 **Organization Type:** Unaffiliated Individual

Representative Quote: The operation and maintenance costs stated in the Mariposa Grove DEIS for the expanded shuttle bus system are grossly understated, and fail to adequately take into account labor costs, and increased infrastructure repair and replacement costs associated with the use of heavy vehicles.

Response: The preliminary cost estimate associated with planning level information that is evaluated in the EIS is presented in Table 2-1. More detailed cost estimates would be developed in concert with final design activities. For planning purposes, the current funding, contractual agreement, and

hourly rate were used as a basis for assumptions. For park owned 40-foot shuttles, current service hour rates were used as well as an amortization rate for park-owned vehicles (\$600,000 per vehicle with a 10-year life span divided by annual hours of service).

Concern ID: 46331

CONCERN STATEMENT: The National Park Service should augment the EIS analysis to include consideration of socioeconomic impacts such as loss of jobs, impacts on small businesses that require vehicular access into the Grove, or park revenue lost due to the discontinuation of the tram, gift shop, or other concessioner activities.

Representative Quote(s): **Corr. ID: 58** **Organization:** Yosemite Trails Pack Station

Comment ID: 320557 **Organization Type:** Unaffiliated Individual

Representative Quote: For the last 48 years my family has been escorting small groups of the people to the Mariposa Grove. It's about a 2 hour ride from our Pack Station and we stop and take short break just to the south east of the Grizzly Giant. We cater to many segments of the general public, many of whom have physical limitations and would not be able to make the trip other then riding in a car.

I support the No Action Alternative. If on the other hand this option is taken off the table, I strongly request that our ability to access the Grizzly Giant not be diminished by the final plan. Our ability to provide access to the public would be severely curtailed and the financial consequences to our family run company would be catastrophic.

Corr. ID: 103 **Organization:** Delaware North Companies Parks and Resorts

Comment ID: 321129 **Organization Type:** Business

Representative Quote: The Plan fails to consider the loss of concessioner jobs and visitor spending that significantly affects concessioner revenues and Park fees.

The concessioner operated services at the Grove generate revenues that annually provide the National Park Service approximately \$1 90,000 in direct fees. Ninety percent of this revenue is retained in Yosemite National Park. Not only was this revenue stream not considered in a socioeconomic analysis, it was not considered in the cost of the alternatives or in the analysis of Park Operations.... We know that there are more than twenty jobs in the Grove relating to tram and retail services and that the visitor spending for the trams will not be replaced as this is a unique service. It is also obvious that the removal of the gift shop (replaced by a book store) will have similar adverse economic impacts.

Corr. ID: 331 **Organization:** *Not Specified*

Comment ID: 321352 **Organization Type:** Unaffiliated Individual

Representative Quote: What is the socioeconomic impact of eliminating private vehicle access to the lower Grove parking area? How does this potentially impact the overall tourism market?

Response: A socioeconomic analysis for this purpose would evaluate potential impacts on the social environment, visitor populations, and the regional economy. The social and economic environments of the surrounding communities are primarily affected by changes in visitor levels, visitor spending, park and concessioner employment, and park and concessioner spending in the regional economy. Impacts on Yosemite National Park and the primary concessioner are addressed in the *Mariposa Grove FEIS* under Chapter 3, Park Operations.

There would be no measureable changes expected in park-wide annual visitation (estimated 3,951,393 people in 2011) as a result of the *Mariposa Grove FEIS*. The goal of the plan is to accommodate current visitor use levels. Concessioner employment associated with the tram, which is eliminated under Alternatives 2 and 4, is a nominal amount of employment and revenue generated within the park. The gift shop would be removed under all action alternatives. New visitor services at the South Entrance area (Alternative 2 or 4) or at Grizzly Giant (Alternative 3) would include visitor information, educational, and other sales items. Visitor convenience items would continue to be sold under a concession contract and it is anticipated that there would be little to no net employment change under the action alternatives.

Overall, the project is expected to result in negligible impacts on the socioeconomic environment, visitor populations, and the regional economy. Similarly, the project is not expected to result in growth-inducing impacts either regionally or in nearby communities; this is a consideration under the California Environmental Quality Act. Therefore, socioeconomics was dismissed from further analysis.

MG7700 – Cumulative Impacts

Concern ID: 46334

CONCERN STATEMENT: The National Park Service should evaluate cumulative impacts that address parkwide planning decisions as well as actions outside of the park boundaries.

Representative Quote(s): **Corr. ID:** 103 **Organization:** Delaware North Companies Parks and Resorts

Comment ID: 321128 **Organization Type:** Business

Representative Quote: The NPS has not adequately analyzed the cumulative effect on the visitor experience and recreation as a result of significant park wide reductions, removal and/or limitations on visitor services and recreational opportunities and that the removal of the gift shop and the tram tours only compounds this concern.

We are concerned that these and the many other services discontinued for a large number of visitors who choose to partake in them will significantly adversely impact the visitor experience for the majority of visitors to Yosemite. We recommend that the NPS issue a supplemental document that describes the cumulative cost, how the plans will be funded, ADA impacts and the reduction in visitor services, experiences and recreation options.

Corr. ID: 331 **Organization:** Not Specified

Comment ID: 321347 **Organization Type:** Unaffiliated Individual

Representative Quote: To what extent (in percentages) has the Grove's health been compromised by the absence of fire versus impacted by people trammeling the area? To what degree has air quality and air emissions impacts from external to the Park affected the Grove's health?

Response: Additional discussion was added to the FEIS to address parkwide planning and the relationship of plans to pursue restoration efforts in Mariposa Grove with those efforts (see Chapter 1 and cumulative impacts discussions in Chapter 3). Concerns such as air quality and air emissions are a larger regional issue. This plan would have minimal impacts on the larger air quality issue. Concerning the Grove's health, quantification of impacts from the absence of fire versus impacts from trammeling is a complex issue. Both have affected the Grove to various degrees. The NPS will continue to monitor the effects of fire and trammeling on the sequoias into the future.

Concern ID: 46535

CONCERN STATEMENT: The National Park Service should provide additional cumulative analysis, particularly in combination with the MRP and TRP.

Representative Quote(s): **Corr. ID:** 103 **Organization:** Delaware North Companies Parks and Resorts

Comment ID: 321133 **Organization Type:** Business

Representative Quote: The Plan does not indicate how it ties to the MRP with respect to parking at Wawona or the continued use of shuttle service from inside the Merced River corridor. Further, there does not appear to be a comprehensive analysis of park-wide traffic circulation that would affect the Grove and South Entrance area.

Corr. ID: 331 **Organization:** *Not Specified*

Comment ID: 321356 **Organization Type:** Unaffiliated Individual

Representative Quote: The projected increase in tour bus activity seems to contradict NPS projections for this visitor group as reported in the TRP and MRP. There is no adopted integrated Park-wide transportation plan.

Response: A discussion of the relationship between other planning efforts and the plan for restoration of the Mariposa Grove was added to Chapter 1 in the FEIS. The options proposed in the *Draft Merced Wild and Scenic River Comprehensive Management Plan* are integrated into planning for the *Mariposa Grove FEIS*. For example, facility and shuttle operations are being designed to accommodate anticipated public transit operations outlined in the MRP. The NPS is also preparing a comprehensive management plan for the Tuolumne Wild and Scenic River that flows through Yosemite National Park. This plan will concur with the same general approach of the in-progress *Draft Merced Wild and Scenic River Comprehensive Management Plan*.

MG8000 – ADA Compliance

Concern ID: 46355

CONCERN STATEMENT: The National Park Service should clarify what is meant by the term “accessibility” and “placarded vehicle.”

Representative Quote(s): **Corr. ID:** 331 **Organization:** *Not Specified*

Comment ID: 321332 **Organization Type:** Unaffiliated Individual

Representative Quote: What are “appropriately placarded” vehicles? Is there a difference between these and vehicles with accessibility placards? How is accessibility defined?

Response: The term accessibility is used in the EIS to refer to facilities that provide access to mobility-impaired visitors in compliance with the Americans with Disabilities Act (ADA). It is used to refer to trails, parking space, and other facilities that would be able to accommodate wheelchairs or other requirements by less mobile visitors. Placarded vehicles refers to the handicapped parking passes that are typically displayed on rearview mirrors that indicate that the car’s passengers require accessible facilities.

MG8100 – ADA – Parking/Access/Trails

Concern ID: 46356

CONCERN STATEMENT: The National Park Service should consider visitors of all ability levels.

Representative Quote(s): Corr. ID: 108 **Organization:** Yosemite Advocates

Comment ID: 321175 **Organization Type:** Unaffiliated Individual

Representative Quote: While we agree that the commercial tram operation should be discontinued, we nevertheless feel that there needs to be some provision for the continuation of handicapped access to the Upper Grove. Perhaps this could best be provided by permitting vehicles with a handicapped placard to travel on the service road, as is done on some of the restricted roads in Yosemite Valley.

Response: This has been an important consideration of the NPS throughout the planning process. The objective is to balance restoration efforts associated with the removal of pavement and other human disturbance with the ability to provide a high quality visitor experience to visitors of all ages and ability levels. Under the action alternatives, this has typically resulted in expansion of accessible trails and improving the quality of the setting and experience in those areas, while also slowing degradation in more primitive areas in the upper Grove.

Concern ID: 46357

CONCERN STATEMENT: The National Park Service should consider alternative means to provide access for people with disabilities that does not allow placarded private vehicles into the Grove.

Representative Quote(s): Corr. ID: 83 **Organization:** CSERC

Comment ID: 321021 **Organization Type:** Conservation/Preservation

Representative Quote: Our Center supports providing access to those who have limited mobility. However, we do not feel that it is necessary to allow those with placards to utilize their private vehicles in the Grove.

Corr. ID: 99 **Organization:** *Not Specified*

Comment ID: 321079 **Organization Type:** Unaffiliated Individual

Representative Quote: The plan needs to provide some other alternative means for handicapped access. One possibility would be to allow private vehicles to drive on the service road. Another suggestion would be to have a small fleet of NEV's (Neighborhood Electric Vehicles) that the handicapped could use.

Corr. ID: 104 **Organization:** *Not Specified*

Comment ID: 321139 **Organization Type:** Unaffiliated Individual

Representative Quote: I understand that after removing the tram road, you plan on creating a hardened dirt road from the Lower Grove to an area near the Grizzly Giant, which will accept handicapped (placard) drivers. Do you really prefer these types of drivers over park personnel operating a tram? Some of the placard drivers will absolutely interfere with hikers and other cars. First-timers will stop and gawk at every opportunity. You can plan on addressing a few car accidents per season (hopefully none involving redwoods).

Corr. ID: 109 **Organization:** *Not Specified*

Comment ID: 321182 **Organization Type:** Unaffiliated Individual

Representative Quote: Alternative transportation for disabled visitors should be considered to Grizzly Giant, such as ADA compliant shuttles, instead of providing for placarded vehicles and parking.

Response: Some visitors with disabilities may be able to ride the shuttle into Mariposa Grove. To address a variety of potential situations, the NPS is committed to providing some accessible parking within the Grove itself to enable greater access. The accessible parking within the Grove is linked to accessible trail connections. The short section of new road alignment below the Grizzly Giant would be signed to encourage visitors to use the pedestrian trail instead of the road so hikers and placarded vehicles would not be sharing the same space. Placarded vehicles would be required to park in designated spaces or pullouts along the way to avoid impacts to trees.