National Park Service
U.S. Department of the Interior

Sequoia and Kings Canyon National Parks

Restoration of Native Species in High Elevation Aquatic Ecosystems Environmental Impact Statement

Sequoia and Kings Canyon National Parks

Public Scoping Comment Analysis Report
from Initial Scoping in January-February 2007

August 2009

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INTRODUCTION AND GUIDE

INTRODUCTION

On January 17, 2007, Sequoia and Kings Canyon National Parks released a public scoping brochure for the Restoration of Mountain Yellow-legged Frogs and High Elevation Lakes and Streams environmental analysis. The brochure included background information on the proposed project, several preliminary alternatives, and a scoping comment form to assist the public with providing scoping comments. The scoping brochure was mailed to approximately 100 individuals, tribes, organizations, and agencies on the parks' mailing list. A news release announcing public scoping was also distributed to approximately 135 media outlets.

Public scoping was conducted from January 17 to February 6, 2007, but comments were accepted as late as April. During that time, the parks received comments from 35 different sources (several people submitted more than one comment letter). Six of the comment letters received were from organizations: High Sierra Hikers Association, Wilderness Watch, California Trout, Californians for Western Wilderness, National Parks and Conservation Association, and Californians for Alternatives to Toxics. Five commenters were affiliated with universities, three with businesses, one was affiliated with the U.S. Forest Service, and the parks received 22 comments from unaffiliated individuals.

In late 2007, a newsletter providing an update on the environmental analysis status was sent to approximately 100 individuals, agencies, interest groups, and tribes on the parks' mailing list including all those who provided comments during the scoping period. As a result of the newsletter, four additional comment letters were received between May 2007 and November 2008 and are included in the record. Two of those letters were from unaffiliated individuals (one had previously submitted comments), and two were from organizations, Western Environmental Law Center and High Sierra Hikers Association (previously submitted comments).

In total, 37 different individuals, groups, businesses, or agencies submitted comments on the proposed project. Commenters provided input by a variety of methods, including letters, email, and completing and submitting the form provided by the parks. All comments received were entered into the National Park Service (NPS) Planning, Environment, and Public Comment (PEPC) system and are a part of the public record.

Each comment letter was reviewed by park staff to determine the potential issues and impact topics related to the proposed project. Some of the comments provided park staff with additional materials and data to assist with the preparation of the environmental document. In late 2007, park staff began writing an environmental assessment for the proposed project. As staff prepared the EA, including the environmental analysis for the proposed project, and re-reviewed the public input on the proposal, it became clear that the project had the potential for significant impacts on the human environment. There was a level of controversy associated with the proposal, the potential for uncertain and potentially significant environmental effects (beneficial and adverse), and the project could result in unique and unknown environmental effects. For these reasons, in accordance with the National Environmental Policy Act (NEPA) section 102 (2)

(C), in early 2009, the Superintendent determined that an Environmental Impact Statement (EIS) would be more appropriate for this project.

This scoping report provides a synopsis of the comments generated during the original scoping period and subsequent letters received from the park after scoping ended. Scoping letters received during the initial public scoping period in 2007, and any letters received thereafter are included in the official record and duplicate letters do not need to be submitted by the original commenters.

A Notice of Intent (NOI) to prepare an EIS has been submitted to the Federal Register in late summer 2009 to generate additional comment letters during a second 30-day scoping period. This scoping report will be updated after the second public scoping period ends.

THE COMMENT ANALYSIS PROCESS

Comment analysis is a process used to compile and correlate similar public comments into a format that can be used by decision makers and the High Mountain Aquatic Ecosystem and Native Species Restoration/EIS team. Comment analysis assists the team in organizing, clarifying, and addressing technical information pursuant to *National Environmental Policy Act* (NEPA) regulations. It also aids in identifying the topics and issues to be evaluated and considered throughout the planning process.

The process includes five main components:

- developing a coding structure
- employing a comment database for comment management
- reading and coding of public comments
- interpreting and analyzing the comments to identify issues and themes
- preparing a comment summary

A coding structure was developed to help sort comments into logical groups by topics and issues. The coding structure was derived from an analysis of the range of topics discussed during internal NPS scoping, past planning documents, and the comments themselves. The coding structure was designed to capture all comment content rather than to restrict or exclude any ideas.

The NPS PEPC database was used for management of the comments. The database stores the full text of all correspondence and allows each comment to be coded by topic and issue. Some outputs from the database include tallies of the total number of correspondences and comments received, sorting and reporting of comments by a particular topic or issue, and demographic information regarding the sources of the comments.

Analysis of the public comments involved the assignment of the codes to statements made by the public in their letters, email messages, and written comment forms. All comments were read and analyzed, including those of a technical nature; opinions, feelings, and preferences of one element or one potential alternative over another; and comments of a personal or philosophical nature.

Although the analysis process attempts to capture the full range of public concerns, this content analysis report should be used with caution. Comments from people who chose to respond do not necessarily represent the sentiments of the entire public. Furthermore, this was not a vote-counting process, and the emphasis was on the content of the comment rather than the number of times a comment was received, or whether a commenter supported or opposed the proposed project or alternatives.

Definition of Terms
Primary terms used in the document are defined below.

Correspondence: A correspondence is the entire document received from a commenter. It can be in the form of a letter, email, written comment form, note card, open house transcript, or petition.

Comment: A comment is a portion of the text within a correspondence that addresses a single subject. It could include such information as opinions on the use of a potential management tool, to request or provide additional data regarding the existing condition, to provide information on laws and regulations, or provide an opinion debating the adequacy of an analysis.

Code: A grouping centered on a common subject. The codes were developed during the scoping process and are used to track major subjects throughout the EIS process.

Concern: Concerns are subdivisions of codes. Codes can be further separated into several concern statements if necessary to provide a better focus on the content of comments. For the purpose of this scoping report, the entire comment on an issue was included but concern statements were not developed. Concern statements will be developed for the supplemental comment summary report which will be prepared after the second scoping period after the publication of the NOI. In cases where no comments were received on an issue, the issue was not identified or discussed in this report.

All scoping comments were considered to be important as useful guidance and public input to the scoping process, but only substantive comments were analyzed in the Public Scoping Comment Summary Report. At this phase of the project, almost all comments are treated as being substantive. No opinions expressing support or opposition for the proposed project are included in this summary.

Guide to This Document
This report is organized as follows:

Content Analysis Report- This is the basic report produced from PEPC that provides information on the numbers and types of comments received, organized by code. The first section of the report provides a summary of the number of comments that were coded under each topic. The second section provides general demographic information, such as the states where commenters live, the number of letters received from different categories of organizations, etc.

Public Scoping Comment Summary- This report summarizes the substantive comments received during the scoping process. These comments are organized by codes and have been taken from the text of the public's comments.

Correspondence Index of Organizations- This table provides a listing of all groups that submitted comments, arranged and grouped by the following organization types as defined by PEPC (and in this order): businesses; conservation/preservation groups; federal government; university/professional society. Each piece of correspondence was assigned a unique identification number upon entry into PEPC. This number can be used to assist the public in identifying the way NPS addressed their comments.

Correspondence Index of Individual Commenters- This table provides a listing of all of the individuals who submitted comments during the initial public scoping period. Like the previous index, each correspondence was assigned a unique identification number which can be used to assist individuals in identifying the way in which NPS addressed their comments. This list is organized alphabetically.

Index By Organization Type- This list identifies all of the codes that were assigned to each individual piece of correspondence and is arranged by organization type. Individual commenters are also included in this report and are identified as Unaffiliated Individuals.

Index by Code- This table lists which commenters or authors (identified by PEPC organization type) commented on which topics, as identified by the codes used in this analysis. The report is organized by code, and under each code is a list of the authors who submitted comments that fell under that code, and their correspondence numbers. Those correspondences identified as N/A represent unaffiliated individuals.

CONTENT ANALYSIS REPORT

Table 1 Summary of Issue Topics, Codes, and Number of Comments Received

Code	Description	# of Comments
AE10000	Affected Environment: Rare Or Unusual Vegetation	1
AE11000	Affected Environment: Species Of Special Concern	4
AE12000	Affected Environment: Wildlife And Wildlife Habitat	5
AE30000	Affected Environment: Baseline information	60
AL2000	Alternatives: Alternatives Eliminated	2
AL4000	Alternatives: New Alternatives Or Elements	43
AL5000	Management Preferred Alternative	1
AL6000	Alternatives: Degree to which alternatives meet project objectives	33
AL7000	Alternatives: Full range of feasible alternatives considered	10
AL8000	Alternatives: Full disclosure of alternative components	39
AQU1000	Aquatic Habitat: Affected Environment	25
AQU2000	Aquatic Habitat: Impacts to Aquatic Ecosystems	57
AQU3000	Aquatic Habitat: Cumulative Effects	19
CC1000	Consultation and Coordination: General Comments	6
CL1000	Climate Change: Climate change analysis	2
CM1000	Cumulative Effects: List of Actions	4
CM2000	Cumulative Effects: Future Foreseeable Actions	3
CM3000	Cumulative Effects: General cumulative effects analysis	12
GA1000	Impact Analysis: Impact Analyses	19
GA2000	Impact Analysis: Use Trends And Assumptions	1
GA5000	Impact Analysis: General Impacts from Alternatives	22
II1000	Irretrievable Impacts: General Comments	7
INF1000	Informational: Available research and studies	43
INF2000	Informational: Permit requirements	1
MI1000	Mitigation: Suggested mitigation	7
MO1000	Monitoring: Monitoring and response plan for project success and/or failure	12

MT1000	Miscellaneous Topics: General Comments	1
ON1000	Other NEPA Issues: General Comments	7
PN1000	Purpose And Need: Planning Process And Policy	8
PN11000	Purpose And Need: Other Policies And Mandates	6
PN4000	Purpose And Need: Park Legislation/Authority	2
PN8000	Purpose And Need: Objectives In Taking Action	18
SC4000	Scenic Resources: Impact of Proposal and Alternatives	2
SO4000	Soundscapes: Impact of Proposal and Alternatives	5
TE4000	Threatened And Endangered Species: Impact Of Proposal And Alternatives	7
UI1000	Unavoidable Impacts: General Comments	10
VE4000	Visitor Experience: Impact Of Proposal And Alternatives	8
VR4000	Vegetation And Riparian Areas: Impact Of Proposal And Alternatives	6
VS4000	Visitor Conflicts And Safety: Impact Of Proposal And Alternatives	9
VU4000	Visitor Use: Impact Of Proposal And Alternatives	6
WH4000	Wildlife And Wildlife Habitat: Impact Of Proposal And Alternatives	30
WH5000	Wildlife And Wildlife Habitat: Cumulative Impacts	3
WI1000	Wilderness: Guiding Policies, Regs, Laws	14
WI2000	Wilderness: Methodology and Assumptions	1
WI3000	Wilderness: Affected Environment	2
WI4000	Wilderness: Impact of Proposal and Alternatives	15
WI5000	Wilderness: Cumulative Effects	2
WQ1000	Water Resources: Guiding Policies, Regs And Laws	1
WQ3000	Water Resources: Study Area	6
WQ4000	Water Resources: Impact Of Proposal And Alternatives	13
WQ5000	Water Resources: Cumulative Impacts	1
Total		**263**

Table 2. Comments Received by State

State	Percentage	# of Correspondences
UNKNOWN	7%	3
MN	2%	1
CA	60%	25
ND	2%	1
AR	2%	1
NM	2%	1
MA	2%	1
OH	2%	1
UT	2%	1
MT	2%	1
WA	2%	1
TX	2%	1
OR	7%	3
Total		**42**

Table 3. Comments Received by Commenter Type

Organization Type	# of Correspondences
Business	4
Federal Government	1
University/Professional Society	7
Conservation/Preservation	9
Unaffiliated Individual	21
Total	**42**

Table 4. Comments Received by Correspondence Type

Type	# of Correspondences
Park Form	3
Letter	18
E-mail	21
Total	**42**

Public Scoping Comment Summary Report

These comments were scanned and copied from letters, emails, and forms received during the initial public comment period through January 2009. They have been paraphrased or modified to clarify content, and to correct grammatical or spelling errors, but the intent of the comment has not been altered.

Comments referencing more than one topic/issue may have multiple subject codes. Corresponding codes are provided as appropriate under the first occurrence of the comment. Refer to table 1 for all code abbreviations and descriptions.

AE10000 Affected Environment: Rare Or Unusual Vegetation

Correspondence Id: 18 **Comment Id:** 96349

Comment Text: Are there endemic or locally rare species of plants that will be affected by the poisoning?

Organization: Californians for Western Wilderness

Other Corresponding Codes: AE30000, AQU1000, AQU2000, GA5000, UL1000

AE11000 Affected Environment: Species Of Special Concern

Correspondence Id: 18 **Comment Id:** 96349

Comment Text: What species of animals live in the lakes to be poisoned? Has the park surveyed all of them? Are there endemic species or locally rare species of animals that will be affected by the poisoning?

Organization: Californians for Western Wilderness

Other Corresponding Codes: AE12000, AE30000, AQU1000, AQU2000, GA5000, UL1000, WH4000

Correspondence Id: 13 **Comment Id:** 96356

Comment Text: First please identify lakes that have been treated and through what methodology? What has been the success first in eliminating trout and second in reintroducing mountain yellow-legged frogs (MYLFs)?

Other Corresponding Codes: AE30000, AQU1000, CM1000, INF1000

Correspondence Id: 2 **Comment Id:** 96229

Comment Text: The fundamental questions arising from the application of antimycin and rotenone to aquatic systems should be, 1) are species of non-target animals disappearing from the single or repeated use of poisons over many years? 2) Is the community of species changing in terms of relative proportions and numbers of individuals? And 3) what are the aquatic and terrestrial food web effects of these changes or losses in the short- and long-term?

Organization: University of California, Davis

Other Corresponding Codes: AE12000, AE30000, AQU1000, AQU2000, AQU3000, WH4000, WH5000

Correspondence Id: 2 **Comment Id:** 96228

Comment Text: Many of the "restoration" projects being proposed and conducted at present are in water most likely to have endemic and rare species of amphibians and invertebrates as well as rare species of fish.

Organization: University of California, Davis

Other Corresponding Codes: AE12000, AE30000, AQU1000

AE12000 Affected Environment: Wildlife And Wildlife Habitat

Correspondence Id: 33 **Comment Id:** 96392

Comment Text: In California's Sierra Nevada alpine ecosystem, non-native fish diminish the strength of the aquatic to terrestrial movement of resources, and thereby indirectly affect terrestrial predators.

Organization: U.C. Davis

Other Corresponding Codes: AE30000, AQU1000, AQU2000

Correspondence Id: 16 **Comment Id:** 96381

Comment Text: Poisons are non-selective and can affect amphibians and invertebrates as well as the targeted fish populations. Many of the wilderness waters where the proposal plans to use poisons have not been fully surveyed, so you don't know what non-target species may be affected.

Other Corresponding Codes:AE30000, AQU1000, AQU2000

AE30000 Affected Environment: Baseline information

Correspondence Id: 33 **Comment Id:** 96393

Comment Text: Considering that the need for your proposed action includes the restoration of "naturally functioning aquatic ecosystems within restoration areas" it is important for management to consider how aquatic ecosystems are linked to terrestrial ecosystems, and thus, how non-native aquatic predators might indirectly affect native terrestrial predators. I recognize that the MYLF is endanger of extinction and that the park has a responsibility to protect this species on park lands, however, I suggest that indirect effects of fish on terrestrial predators be considered so that fish removal is not limited to recovery of a single species (the MYLF).

I suggest that the park include an experimental design (such as a Before, After, Control, Impact or BACI) to evaluate the ecological response (beyond a MYLF response) likely to be detected at the fish-removal lakes. In addition to monitoring MYLF populations (i.e., using a BACI design), the park should also monitor aquatic invertebrate species diversity and biomass as well as passerine diversity and abundance. Following fish removal, I would expect aquatic invertebrates and birds to respond positively.

Organization: U.C. Davis

Other Corresponding Codes: AL6000, AQU2000, GA5000, MO1000, WH4000

Correspondence Id: 31 **Comment Id:** 96401

Comment Text: I would just like to add that improved public access to information and thorough justification of alternatives through robust data will be very helpful in terms of gaining public support.

Organization: California State University, Fresno

Other Corresponding Codes: AL6000, AL8000, INF1000

Correspondence Id: 30 **Comment Id:** 96405

Comment Text: Chemical fish poisons kill many non-target species including other fish species, the tadpoles of frogs and toads, and aquatic invertebrates like stoneflies and other macro-invertebrates. The effects of chemical fish poison are not temporary since studies have shown that macro-invertebrate populations have not recovered for many years after chemical fish poisoning has been used. Chemical fish poisons contain solvents, emulsifiers, dispersants, and other additives that are potentially harmful to aquatic life and human health.

Other Corresponding Codes: AQU2000, GA5000, II1000, UI1000, VS4000, WH4000

Correspondence Id: 29 **Comment Id:** 96337

Comment Text: What are the relative depths of the lakes? Both electro shocking and poisoning are more effective in shallower lakes than in deep ones.

Organization: Wilderness Watch

Other Corresponding Codes: AL4000, AL6000, AL8000, WQ3000

Correspondence Id: 29 **Comment Id:** 96333

Comment Text: Which lakes in the parks provide the best habitat for the MYLF?

Organization: Wilderness Watch

Other Corresponding Codes: AQU1000

Correspondence Id: 26 **Comment Id:** 96367

Correspondence Id: 28 **Comment Id:** 96288

Comment Text: Blaming the trout in these high mountain lakes for the decline of the yellow-legged frog is very disturbing for several reasons. You cannot ignore the fact that the trout and the MYLF have coexisted for over 150 years in these high mountain lakes without a problem until the last two decades. The trout didn't just suddenly acquire a taste for frogs; they have been part of the balanced food chain for nearly 150 years. The root cause of the decline of the yellow-legged frog is not the trout but a worldwide fungus called the Chytrid fungus. Berkley researcher Vance Vredenburg found piles of mountain yellow-legged frogs dead from the Chytrid fungus (chytridomycosis) in the Sierra Nevada two and a half years ago.

Other Corresponding Codes: INF1000

Correspondence Id: 17 **Comment Id:** 96354

Comment Text: Use of poisons may have the desired effect of getting rid of the unwanted fish species. However, what other life forms in the water and surrounding shoreline will also be affected by the use of the poisons?

Other Corresponding Codes: AQU2000, UI1000, WH4000, WQ4000

Correspondence Id: 18 **Comment Id:** 96344

Comment Text: Our concern is whether non-native fish are the predominant factor in this decline. Increasingly, the evidence seems to be that pesticide drift from the Central Valley may be playing a major role. Thus, even if non-native species are eliminated, the problem may not be solved. If this is the case, then poisoning may be an incomplete solution, and the aftereffects may be worse than the current situation.

Organization: Californians for Western Wilderness

Other Corresponding Codes: AL6000, AQU3000, CM3000, INF1000

Correspondence Id: 21 **Comment Id:** 96375

Comment Text: Non-native trout are only one of various reasons suggested for decline in MYLF. It might be good to address some of the other reasons (fungus, pollution from outside area, etc.)

Other Corresponding Codes: AQU1000, CM3000

Correspondence Id: 22 **Comment Id:** 96371

Comment Text: Include in your analysis a historic overview of all piscicide projects, both those that have succeeded for a long period of time, and those that have not, and an analysis of those factors that have been blamed for project failures.

Organization: Californians for Alternatives to Toxics

Other Corresponding Codes: CM1000, INF1000

Correspondence Id: 22 **Comment Id:** 96373

Comment Text: Since all state and federal agencies are working in cooperation concerning recovering the MYLF, and have been working in cooperation with each other for some time on joint piscicide projects, this analysis should consider both current effects to recovery from all projects as a whole, as well as the cumulative aspect of these projects.

Organization: Californians for Alternatives to Toxics

Other Corresponding Codes: CC1000, CM1000, CM3000

Correspondence Id: 24 **Comment Id:** 96407

Comment Text: It is highly inappropriate to use chemical fish poisons in the SEKI Wilderness, even if for an important purpose like restoring the MYLFs. Chemical fish poisons are toxic to all gill-breathing organisms, and will kill not only the target fish species but also tadpoles and aquatic invertebrates. At other sites in the Sierra Nevada, studies have shown that populations of rare stoneflies and other macroinvertebrates have failed to recover even years after stream poisonings. Such poisons create significant long-term and perhaps permanent effects, and can hardly be considered temporary.

Other Corresponding Codes: AQU2000, AQU3000, GA5000, II1000, UI1000

Correspondence Id: 25 **Comment Id:** 96402

Comment Text: Using poisons would harm all of the ecology of the lakes. I have worked on research on Sierra lakes and know how fragile they are. The biota in them follows certain natural yearly life cycles that might be disrupted. Poisoning them is a decided overkill.

Other Corresponding Codes: AQU1000, AQU2000, AWU3000, GA5000, II1000

Correspondence Id: 2 **Comment Id:** 96236

Comment Text: It is likely that low level residues of pesticides are present now in many aquatic habitats, and these levels may increase without the further review or analysis previously required by NPDES permits. At present, we are unaware of any fish poisoning project that has analyzed water or sediments for low level pesticide residue prior to applying rotenone formulations or antimycin.

Organization: University of California, Davis

Other Corresponding Codes: AQU3000

Correspondence Id: 6 **Comment Id:** 96211

Comment Text: Provide the names of lakes and estimated dates for fish extermination and frog restoration. The ability for the public to go online and confirm the list of lakes having been restored or currently undergoing preparation for restoration, as well as any census data on restored lake frog populations and other observed or measured effects on local fauna.

Other Corresponding Codes: AL8000

Correspondence Id: 7 **Comment Id:** 96218

Comment Text: Measure existing conditions at high elevation lakes. How does acid precipitation impact these high elevation lakes and what would be the cumulative effect of adding additional chemicals?

Other Corresponding Codes: AQU1000, WA5000

Correspondence Id: 7 **Comment Id:** 96219

Comment Text: Are there any missing components from the aquatic ecosystems, besides MYLFs? Is the invertebrate fauna still impact?

Other Corresponding Codes: AQU1000

Correspondence Id: 7 **Comment Id:** 96220

Comment Text: Are all of the 30 to 85 lakes connected by streams?

Other Corresponding Codes: WQ3000

Correspondence Id: 9 **Comment Id:** 96272

Comment Text: There should be comprehensive pre-action assessment of water quality and wildlife, especially amphibian surveys, and surveys of macroinvertebrates at the species level. There should be long-term post-action monitoring of these parameters.

Other Corresponding Codes: MO1000

Correspondence Id: 10 **Comment Id:** 96268

Comment Text: Establish an "ideal" state for the reproduction of MYLFs. Identify all other predators and threats to the frog's survival (e.g. Chytrid Fungus) and possible means of eliminating these threats. Also, identify other threats to the ecosystem, including pesticide run-off or damaging substances that could harm the immune system of the frogs or other organisms. Work to return the entire ecosystem to its original state- not just for the frogs, but for all species (amphibians, insects, etc) that rely on this habitat.

Organization: National Parks and Conservation Association

Other Corresponding Codes: AL4000

Correspondence Id: 2 **Comment Id:** 96230

Comment Text: To our knowledge, no inventories of species have been done anywhere in the western US prior to a stream or lake poisoning operation. The monitoring studies done in co-ordination with poisoning operations are conducted at broader taxonomic levels than species, that is, at genus, family, order, and class levels. Total taxa and EPT (Ephemeroptera, Plecoptera, Trichoptera) measurements are not precise enough to answer the most fundamental questions about the outcomes of poisoning.

Organization: University of California, Davis

Correspondence Id: 11 **Comment Id:** 96304

Comment Text: Provide a list of all aquatic species in these habitats, including all invertebrates.

Organization: University of California, Davis

Other Corresponding Codes: AQU1000

Correspondence Id: 11 **Comment Id:** 96310

Comment Text: Review the evidence that the prevailing cause of mountain yellow-legged frog decline is due only to exotic fish and chytrid fungus. Discuss chytrid fungus effects on MYLFs in systems with native fish.

Organization: University of California, Davis

Other Corresponding Codes: INF1000

Correspondence Id: 11 **Comment Id:** 96311

Comment Text: Analyze the historic role that rotenone formulations and antimycin have played in causing the declines of MYLF in California over the 60 or 70 years. These poisons have been used by California Department of Fish and Game without public review or knowledge.

Organization: University of California, Davis

Other Corresponding Codes: INF1000

Correspondence Id: 11 **Comment Id:** 96313

Comment Text: Discuss evidence for current and historic pesticide residue in SEKI aquatic systems including annual increments from windblown particles onto snow and in rain. Discuss how these residues interact with chytrid fungus or other disease agents that are linked to frog declines.

Organization: University of California, Davis

Other Corresponding Codes: AQU3000, WH5000

Correspondence Id: 11 **Comment Id:** 96314

Comment Text: Review the possible toxic interaction of various rotenone formulations with residues of other pesticides on aquatic life. Review the evidence that pesticide residue, including PCB residue, multiplies or adds to the toxicity of rotenone (or other aquatic poisons) to aquatic life. Discuss how the NPS can ensure that non-target organisms will be protected from toxicological interactions between aquatic pesticides and air born pesticides already in the water. Discuss how the NPS plans to determine what species of invertebrates are sensitive to rotenone and other active ingredients in rotenone formulations (or antimycin formulas) and to interactions between rotenone and other chemicals already in the environment.

Organization: University of California, Davis

Other Corresponding Codes: AQU2000, AQU3000, CM3000

Correspondence Id: 11 **Comment Id:** 96320

Comment Text: Provide data on food habit studies of MYLF in the parks.

Organization: University of California, Davis

Other Corresponding Codes: INF1000

Correspondence Id: 11 **Comment Id:** 96321

Comment Text: Provide all other locations of MYLF in California.

Organization: University of California, Davis

Other Corresponding Codes: INF1000

Correspondence Id: 11 **Comment Id:** 96318

Comment Text: Provide specific data showing evidence that chytrid resistance is emerging in sites that had large populations of MYLF prior to infection, as referred to in the Scoping Notice.

Organization: University of California, Davis

Other Corresponding Codes: INF1000

Correspondence Id: 13 **Comment Id:** 96361

Comment Text: If it could be demonstrated that even prized fishing waters were uniquely qualified for successful reintroduction of MYLF then I would support treatment, but I would need to have demonstrated that all other fishbearing lakes lacking a quality fishery were examined as well.

Other Corresponding Codes: AL4000, AL7000

Correspondence Id: 13 **Comment Id:** 96364

Comment Text: Before selecting an alternative that included chemical treatment please demonstrate how the elimination of macroinvertebrates would be conducive to the successful reintroduction of MYLF.

Other Corresponding Codes: AL6000, AQU1000, AQU2000

Correspondence Id: 13 **Comment Id:** 96357

Comment Text: Clearly identify the threat caused by chytrid fungus. Can its presence or absence be definitively established prior to treatment? If it is absent can you determine with any level of certainty that it will not be introduced after treatment and reintroduction of MYLF? Can the surveying and/or treatment of lakes lead to the introduction of the chytrid fungus?

Other Corresponding Codes: AL6000, AQU1000, GA1000, INF1000

Correspondence Id: 14 **Comment Id:** 96258

Comment Text: Our understanding of the factors causing the decline of the MYLF has increased recently, particularly with the scientific community's documentation of the role played by the chytrid fungus, chytridiomycosis (see, Rachowitz et al., 2006, Briggs et al., 2005, Fellers et al., 2001). Although these recent publications suggest that MYLF can possibly survive in waters contaminated with the chytrid fungus, this issue must be taken into account when considering fish removal.

Organization: California Trout

Other Corresponding Codes: AQU1000, INF1000

Correspondence Id: 14 **Comment Id:** 96261

Comment Text: Additional research should be conducted to help better understand factors that may optimize the survival of the MYLF in High Sierra lakes. Despite recent work, such as that of Rachowicz et al. (2006), much remains to be learned about which lakes are most likely to provide good habitat for the MYLF. For example, since the pathogen may be carried and transported by other species, better understanding the interaction of these populations and the MYLF would be helpful in site selection.

Organization: California Trout

Other Corresponding Codes: INF1000

Correspondence Id: 15 **Comment Id:** 96412

Comment Text: No one knows what species have yet to be discovered in those lakes, including insects. Who knows what other species are represented in those lakes? I am certain you have not completed a full analysis as wilderness designation would never allow such an analysis to take place (the equipment and footprint would be too severe). But most certainly such many millions of living things are at stake here.

Organization: Alpine WildSeed

Other Corresponding Codes: AQU1000, INF1000, WI1000

Correspondence Id: 29 **Comment Id:** 96326

Comment Text: We ask that the EA provide details on any surveys and their findings regarding macro-invertebrates at each of the target lakes. At a minimum such inventories must be completed by qualified macro-invertebrate biologists prior to even considering the use of piscicides (see Californians for Alternatives to Taxies v. Troyer, Federal District Court for the Eastern District of California, 2005). Neither an EA nor an EIS can adequately analyze and disclose the likely environmental impacts of the proposal without this basic information.

Organization: Wilderness Watch

Other Corresponding Codes: INF1000

Correspondence Id: 29 **Comment Id:** 96334

Comment Text: What criteria will be used to select the lakes to be addressed by the project, and will the specific lakes differ depending on which alternative is selected?

Organization: Wilderness Watch

Other Corresponding Codes: AL8000, AQU1000

Correspondence Id: 29 **Comment Id:** 96336

Comment Text: What is the range in surface acreage for the selected lakes, and what is the average surface acreage? Smaller lakes are more conducive to successful electroshocking than large lakes.

Organization: Wilderness Watch

Other Corresponding Codes: AL6000, AL8000, WQ3000

Correspondence Id: 29 **Comment Id:** 96339

Comment Text: Provide a description of the scope and number of macro-invertebrate surveys that have been conducted at the selected lakes and the survey findings

Organization: Wilderness Watch

Other Corresponding Codes: AQU1000, INF1000

Correspondence Id: 31 **Comment Id:** 96395

Comment Text: Provide the public with more data and information so that we can more intelligently comment on the proposal.

Organization: California State University, Fresno

Other Corresponding Codes: AL8000, INF1000

Correspondence Id: 31 **Comment Id:** 96396

Comment Text: I would like see more complete data showing the recovery of MYLF populations in lakes where fish have been removed. The small number of frogs and tadpoles, and lack of spatial information, and small number of total lakes, in the two simple plots included in the scoping document do not give a reader a good indication of whether the recovery is really ongoing. I would like to see raw data from each of the six lakes, for example. In addition, fish kills have been conducted in the surrounding wilderness areas. I would like to see data from those lakes as well. Collectively, the data from more lakes (wilderness plus park) give one a picture that is more statistically robust. It is important to see real data supporting MYLF recovery in fish-killed lakes, because it would be wasteful to exterminate fish without a reasonable possibility that the extermination will aid MYLF recovery. There are certainly many major lakes in Sequoia-Kings Canyon National Parks in which neither MYLF nor trout can be found.

Organization: California State University, Fresno

Other Corresponding Codes:INF1000

AL2000 Alternatives: Alternatives Eliminated

Correspondence Id: 19 **Comment Id:** 96411

Comment Text: I have heard "fishing derbies" have been considered in aiding fish extermination efforts. I would be opposed to this idea out of my concern for the fragile habitat. I would also like to see some attention to the effort of putting these frogs in some currently fish-barren lakes.

Other Corresponding Codes: AL4000

Correspondence Id: 9 **Comment Id:** 96275

Comment Text: Rotenone-containing products are the only piscicides available for use in California because antimycin (Fintrol) is not registered for use there.

AL4000 Alternatives: New Alternatives Or Elements

Correspondence Id: 36 **Comment Id:** 96386

Comment Text: If a lake is only a couple miles from the road, would vandals reintroduce fish? Should we spend time and money on those lakes? Or should you restore lakes near roads that are easiest to patrol?

Other Corresponding Codes: Al6000, MO1000

Correspondence Id: 36 **Comment Id:** 96385

Comment Text: I hope you can restore the frog with meticulous detail to most of the lakes and leave some of the lakes for fish. I suggest leaving fish in lakes that are a day's hike from the nearest trailhead.

Correspondence Id: 33 **Comment Id:** 96394

Comment Text: I did not find any mention of how many treatment lakes and streams the park is considering. In order to recover the MYLF on lands managed by the park, it is important that the number of treatments be high enough to provide multiple breeding sites and refugia from predators and disease within each basin occupied by the MYLF. At a minimum this should include lakes and streams within the same basin that have surface water connectivity to occupied sites. Basins historically occupied by the MYLF should also be considered for fish removal, especially if natural recolonization of MYLF is likely to occur, but also if MYLF reintroduction is feasible.

Organization: U.C. Davis

Correspondence Id: 31 **Comment Id:** 96400

Comment Text: I believe there is another fish removal alternative that should be considered and this is a phased physical, then physical and/or chemical removal. This alternative would implement physical removal for the first stage of the project. If data collected in the meantime both within the parks and surrounding wilderness areas more convincingly supports MYLF recovery, then chemical treatment can be applied in lakes where physical removal is ineffective or impractical. The advantage of this approach is that is buys a little bit of time for additional data to be collected demonstrating the benefits of fish removal. If data shows no MYLF recovery, then the fish kills can be halted, and fewer lakes will be affected, owing to the fact that physical removal of fish is much slower to implement than chemical removal.

Organization: California State University, Fresno

Other Corresponding Codes: MO1000

Correspondence Id: 31 **Comment Id:** 96398

Comment Text: I am aware of areas in Triple Divide-Kaweah region where dozens of lakes, including several major basins, have neither fish nor frogs. Some of these lakes once held fish and went fishless upon cessation of stocking) whereas many of the basins draining into the Kern-Kaweah River may not have ever had trout introduced. The point I make here is that a trout-bearing lake in this part of the Sierra (such as Josephine Lake, or the two lakes at the head of Ferguson Creek) should not be targeted for fish removal because it is clear that there is another cause for the lack of frogs there.

In terms of an example of striking a balance between recreational fisheries and frog recovery, one might look at the Sawmill Pass-Taboose Pass area as an example. Marjorie Lake and a few neighboring lakelets are overpopulated with stunted brook trout. It would be no great loss to the angling community if these lakes had their fish culled. Many of the unnamed lakes around Woods Lake are similar. I've seen MYLF at Woods Lake in spite of the enormous population of trout there and in surrounding lakes. Losing Woods itself might be a blow to anglers given the fish are not all that small in that lake, but all the surrounding lakes are teeming with the garden variety stunted brook trout, and few anglers would protest the removal of fish there. Moreover, the presence of MYLF in the area in the face of all odds suggests that they might do quite well if fish were removed.

In contrast, the two lakes below Striped Mtn. have both fish and MYLF, but the rainbow trout fisheries there are among the best in the entire Sierra in terms of fish size. Similarly, there is an unnamed lake just south of Pinchot Pass with some of the best golden trout in the park. Removal of fish from such lakes would be a big blow to the more enterprising and ambitious Sierran angler.

Organization: California State University, Fresno

Other Corresponding Codes: AL8000

Correspondence Id: 29 **Comment Id:** 96335

Comment Text: How many of the selected lakes are closed cirque basins (i.e. no in-flowing side streams?) The fewer side streams the less work there would be to erect spawning barriers or install matting to inhibit spawning.

Organization: Wilderness Watch

Other Corresponding Codes: AL4000, AL6000

Correspondence Id: 29 **Comment Id:** 96331

Comment Text: The EA should examine the potential to cultivate volunteer groups to conduct the manual treatments over time. We ask that the EA discuss the possibility of implementing an Adopt-A-Lake program,

and highlight the participants and the work being done in park publications and visitor center displays.

Organization: Wilderness Watch

Correspondence Id: 29 **Comment Id:** 96330

Comment Text: The manual treatment alternative should fully explore using a full range of manual treatments that include: 1. Placing barriers to prevent fish from accessing spawning beds in shallow side streams 2. Cover fish spawning beds- in side streams or along the lake shore with dense matting to inhibit successful spawning 3. Gillnetting and electroshocking using rowboat, kayak, or canoe 4. Eliminate daily catch limits on fish (if any are in place) -- encourage the public to fish in the lakes, and prohibit catch and release fishing

Organization: Wilderness Watch

Correspondence Id: 29 **Comment Id:** 96329

Comment Text: The EA should include a non-chemical, manual treatment alternative that would be conducted entirely by non-motorized means -- i.e. no helicopter transport of people or supplies, and no motors on boats used for electroshocking and gillnetting.

Organization: Wilderness Watch

Correspondence Id: 22 **Comment Id:** 96370

Comment Text: All possible alternatives should be included in the analysis, including restoration potential throughout the High Sierra's (not limited to SEKI MYLF project area).

Organization: Californians for Alternatives to Toxics

Other Corresponding Codes: AL7000

Correspondence Id: 19 **Comment Id:** 96409

Comment Text: I see little reason or evidence for sterilizing these larger lakes and their associated streams, simply leave them to the fish. I would assume there are plenty of lakes that are of a size that allow for current gill netting and electro-fishing methods, providing ample habitat for the recovery of these frogs. Perhaps a few larger lakes could be treated chemically to allow for overall success in any given basin. Perhaps some of these larger lakes will be more conducive to the recovery of the MYLF, and having a few larger lakes will allow for some studies in comparison to smaller lakes.

Other Corresponding Codes: AL6000, AL7000

Correspondence Id: 16 **Comment Id:** 96384

Comment Text: Only physical treatments using manual methods such as gill nets and electro-shockers can meet the "minimum tool" test of the Wilderness Act if removal of the non-native trout is necessary.

Other Corresponding Codes: WI1000

Correspondence Id: 14 **Comment Id:** 96263

Comment Text: California Trout strongly recommends that the NPS research captive breeding strategies for the MYLF. Understanding how to breed and raise the frog in captivity will allow the NPS to establish future refugia populations and wide scale reintroductions into the wild.

Organization: California Trout

Correspondence Id: 14 **Comment Id:** 96262

Comment Text: The NPS should secure and establish several MYLF populations in uncontaminated environments. Recent experience with the loss of genetic purity of the California golden trout demonstrates how critical it is to retain multiple-physically disjunctive populations of threatened species.

Organization: California Trout

Correspondence Id: 13 **Comment Id:** 96360

Comment Text: Most lakes in the Roaring River drainage are barren including: Along the great western divide except Big and Little Brewer and Colby Lake, all Lakes on Glacier Divide except Josephine, the lakes at the head of box canyon, and Crescent, Ranger and a couple of unnamed lakes below Siliman. Leaving fish in Beville, Lost, Seville, Big and Little Brewer, and the two Upper Ferguson lakes seems a reasonable compromise and would leave less than 20% of the Lakes in this basin with fish and would reduce the number of lakes with fish by 30%.

Correspondence Id: 12 **Comment Id:** 96366

Comment Text: Remove non-native trout using manual methods only

Correspondence Id: 12 **Comment Id:** 96365

Comment Text: No helicopter or other forms of motorized access should be authorized.

Other Corresponding Codes: WI1000, WI3000, WI4000

Correspondence Id: 11 **Comment Id:** 96315

Comment Text: Describe re-education program to prevent the general public and the California Department of Fish and Game from making future introductions of non-native species into the project areas.

Organization: University of California, Davis

Other Corresponding Codes: MI1000

Correspondence Id: 11 **Comment Id:** 96316

Comment Text: Describe how the NPS will prevent transfer of fish from the 85%-95% of other waters in the park where fish will continue to occur to streams and lakes where fish will be removed.

Organization: University of California, Davis

Other Corresponding Codes: MO1000

Correspondence Id: 10 **Comment Id:** 96269

Comment Text: Proper public education will assist the NPS in a successful, obstacle free restoration effort. For example: The removal of fish from specified lakes and ponds are going to draw concerns from the fishing community. Likewise, unexplained use of chemical use in water sources-many of which feed to neighboring gateway communities-will cause alarm to the general public. Without proper public education, Sequoia and Kings Canyon staff faces potential conflict and road-blocks in their efforts to preserve this diminishing species.

Organization: National Parks and Conservation Association

Correspondence Id: 10 **Comment Id:** 96270

Comment Text: As an advocate for national parks and park visitors alike, we urge Sequoia and Kings Canyon planning and public outreach staff to communicate essential messages to the public. For example: 1. Explain the importance of preserving this rare and unique species. 2. Communicate that fishing is still permitted within the park and where permitted fishing locations exist. 3. Explain the restoration process, identifying chemicals used and any harmful effects to humans or environment. 4. Identify the steps the public can take to assist with this restoration process, including behavior in/near treated areas.

Organization: National Parks and Conservation Association

Correspondence Id: 10 **Comment Id:** 96267

Comment Text: In addition to removing non-native fish, steps should be taken to restore targeted lakes and ponds to their natural state. For example: While non-native fish are a major part of the MYLF's demise, other factors-such as the Chytrid Fungus-play a role as well. Additionally, many other microorganisms and species compliment this environment and could contribute to restoring a healthy habitat for the MYLF to thrive.

Organization: National Parks and Conservation Association

Correspondence Id: 9 **Comment Id:** 96285

Comment Text: Ceasing stocking of non-native fish should be analyzed as a separate alternative and in combination with other potential actions to restore MYLF.

Correspondence Id: 9 **Comment Id:** 96284

Comment Text: A separate alternative should be analyzed that uses netting and fishing to remove fish and reintroduces MYLF to sites where they have been extirpated. This alternative would use no poisons or electro-fishing.

Correspondence Id: 6 **Comment Id:** 96212

Comment Text: Keep the use of poisons for fish removal held to an absolute minimum. For any lakes where poison figures to be the only viable strategy, delaying the implementation of its use towards the end of this project allowing more time for alternative strategies to become available.

Other Corresponding Codes: MI1000

Correspondence Id: 6 **Comment Id:** 96215

Comment Text: The following lakes should remain in their current state including: Crabtree Lakes Basin, Lake South America and these other nearby lakes forming the headwaters to the Kern River, Vidette Lakes Basin, Whale Lakes Basin, Wright Lakes Basin, Wallace Lakes Basin, Lakes along eastern escarpment entrances including Bench, Baxter, Woods, and Cottonwood. Upper Treasure Lakes, Lake Basin, Dumbbell Lakes Basin, Martha Lake, Davis Lake, Darwin Bench, Upper Lamark and the East Creek drainage.

Correspondence Id: 6 **Comment Id:** 96214

Comment Text: Lakes that should be restored for MYLF include: Upper Dusy Basin, Center Basin, Upper McGee Basin, Palisade Basin, Inonian Basin, the lakes from Evolution Basin down to and including Evolution Lake, the lakes above Rae Lakes Basin (Dragon, for example), Hitchcock Lakes Basin, Kaweah Gap Lakes, and Rocky Basin Lakes.

Correspondence Id: 6 **Comment Id:** 96213

Comment Text: Criteria suggested for lake restoration: 1) Restoration of as many lakes with populations of brook trout as NPS criteria permit. These fish are the least liked fish within SEKI by serious anglers. 2) Allow as many lakes as possible containing larger specimens of rainbow, cutthroat, and goldens (hybrids) to remain.

Correspondence Id: 2 **Comment Id:** 96235

Comment Text: Monitoring or oversight by any independent agency should be required.

Organization: University of California, Davis

Correspondence Id: 1 **Comment Id:** 96202

Comment Text: Non-native fish can be removed without poisons. We note that many other areas concerned about non-native fish are now removing harmful fish with manual methods instead of chemical poisons. For example, extensive (i.e., long-term and spatially large) restoration and fish removal projects in the Sierra Nevada are being proposed without chemical poisons at Yosemite National Park, Upper Truckee River, and Desolation Wilderness. These projects demonstrate that it is imminently feasible to remove fish from wilderness lakes and streams without the use of chemical poisons. These data must inform both the hard look SEKI takes at this proposal, and its presentation and consideration of a reasonable range of alternatives.

Organization: Western Environmental Law Center

Other Corresponding Codes: INF1000

AL5000 Management Preferred Alternative

Correspondence Id: 34 **Comment Id:** 96391

Comment Text: Use both physical and chemical treatments. Careful use of piscicides will not have lasting deleterious effects to non target organisms.

Organization: U.S. Forest Service, Intermountain Region

Other Corresponding Codes: GA5000

AL6000 Alternatives: Degree to which alternatives meet project objectives

Correspondence Id: 38 **Comment Id:** 96239

Comment Text: What are the benchmarks of project success and/or failure?

Correspondence Id: 34 **Comment Id:** 96390

Comment Text: Although there are no guarantees against illegal reintroduction of game fish, the more ownership that sports fishing people have in the process, the more likely the restoration will be a success.

Organization: U.S. Forest Service, Intermountain Region

Other Corresponding Codes: CC1000

Correspondence Id: 7 **Comment Id:** 96223

Comment Text: Under the proposed action, would the chytrid fungus have the potential to kill the reintroduced MYLFs? Doing research on the fungus would be a high priority.

Other Corresponding Codes: GA1000, INF1000

Correspondence Id: 11 **Comment Id:** 96299

Comment Text: Few poisoning projects are successful in the long-term for even their fish management objectives.

Organization: University of California, Davis

Correspondence Id: 13 **Comment Id:** 96358

Comment Text: Though the removal of fish may be a necessary condition to the successful increase or reintroduction of the MYLF it may not be a sufficient condition.

Correspondence Id: 13 **Comment Id:** 96362

Comment Text: Demonstrate that reintroduction in the proposed lakes after treatment will be successful through a careful environmental consequences and cumulative effects analysis.

Other Corresponding Codes: CM3000, GA5000

Correspondence Id: 18 **Comment Id:** 96350

Comment Text: How will the poisoning affect existing populations of MYLFs and their tadpoles and their eggs?

Organization: Californians for Western Wilderness

Other Corresponding Codes: AQU2000, GA1000

Correspondence Id: 1 **Comment Id:** 96203

Comment Text: Amphibian reintroductions at SEKI have failed. Recent reports document that frog reintroduction efforts often fail, because programs to reestablish amphibian populations are often flawed by not investigating the cause(s) of the original decline or extirpation. Specifically, scientists recently reintroduced MYLFs and tadpoles to a portion of SEKI only to watch them die and disappear within a year. The reported cause of the rapid decline was a fungal disease and/or exposure to airborne pesticides, not fish predation. Therefore it is possible that the current proposal to poison numerous lakes and streams to eliminate fish would not achieve the objective of reestablishing frog populations.

Organization: Western Environmental Law Center

Other Corresponding Codes: PN8000

Correspondence Id: 2 **Comment Id:** 96233

Comment Text: Agency personnel have difficulty correctly applying the target dose of antimycin to streams.

Organization: University of California, Davis

Other Corresponding Codes: MT1000

Correspondence Id: 2 **Comment Id:** 96238

Comment Text: Stream and lake poisoning projects to eliminate unwanted fish species have a poor record of long-term success. Agencies poison waters for two or three years, unwanted fish return within about 10 years, and the agencies begin poisoning again. Agencies have a long record of errors and mishaps with their poisoning operations.

Organization: University of California, Davis

Correspondence Id: 5 **Comment Id:** 96210

Comment Text: The manual removal of non-native fish from SEKI's lakes and ponds would not pose any of the adverse impacts related to fish poison(s), and would not require the use of helicopters within the SEKI Wilderness.

Organization: High Sierra Hikers Association

Other Corresponding Codes:WI4000

Correspondence Id: 7 **Comment Id:** 96217

Comment Text: Will removing trout from 30 to 85 lakes and restoring MYLFs restore the aquatic ecosystems?

Other Corresponding Codes: PN8000

Correspondence Id: 3 **Comment Id:** 96244

Comment Text: Nowhere in your plan do you discuss what will happen if the MYLF restoration fails. What will be your benchmarks of completion and/or failure?

Organization: California School of Flyfishing

Other Corresponding Codes: MO1000

Correspondence Id: 22 **Comment Id:** 96368

Comment Text: The use of rotenone has never shown itself to be an effective eradicator of any target species over time except in isolated cases, is extremely toxic to numerous other species, has never been studied in relation to long term cumulative effects to plant and animal species common to SEKI, and is nothing more than an attempt at a quick fix to correct past mismanagement of our wilderness areas.

Organization: Californians for Alternatives to Toxics

Other Corresponding Codes: AQU3000, CM3000

Correspondence Id: 27 **Comment Id:** 96254

Comment Text: Manual gill-nets and electro shockers have been shown to be very effective at eliminating non-native trout from lakes/ponds.

Correspondence Id: 28 **Comment Id:** 96289

Comment Text: The eradication of trout is based on a 2001 National Parks study that simply ignores other causes such as the Chytrid fungus, which was known at the time to have devastating effects on frog populations. Relying on junk science, decision-makers at Sequoia and Kings Canyon are once again ignoring overwhelming evidence that demonstrates that it is the fungus and not the trout that has caused the decline of the MYLF. By singling out the trout from a host of predators with the knowledge that the fungus has caused over 120 amphibian species to vanish throughout the world and recently decimating the MYLF in the park sets a frightening precedent. This most likely will result in fishless and frogless high mountain lakes and a waste of taxpayer money. Science should determine what should be done, rather than the baseless approach of blaming trout. Killing trout does not address the problem. I would hope that the NPS would be more concerned with the potential devastation that this fungus may have on the entire ecosystem in the park before ruining some of the best fishing in California.

Correspondence Id: 29 **Comment Id:** 96327

Comment Text: The extent of the likely benefits and drawbacks to all affected species must be described in detail in an EIS. We question the benefit of using poison because piscicides kill MYLF tadpoles. The tadpole stage of the MYLF lasts for four years, leaving the MYLF species highly vulnerable to poisoning projects.

Organization: Wilderness Watch

Other Corresponding Codes: AQU2000, PN8000

Correspondence Id: 29 **Comment Id:** 96328

Comment Text: We support removal of the non-native fish, restoring high elevation lakes to their naturally fishless condition, and improving protection for the MYLF as well as other native and endemic species. To achieve these outcomes while doing the least amount of harm should be the top priority, rather than the amount of time required to accomplish these goals. We ask that the analysis specifically adopt this priority and weigh each alternative according to how closely it meshes with this priority.

Organization: Wilderness Watch

Other Corresponding Codes: AL7000, PN8000

Correspondence Id: 35 **Comment Id:** 96388

Comment Text: Employ the strongest possible means to protect all remaining MYLFs, and to preserve and enlarge suitable habitat with extreme urgency. As you know, this species could be extinct in ten years, unless concerted and effective actions are taken immediately.

AL7000 Alternatives: Full range of feasible alternatives considered

Correspondence Id: 17 **Comment Id:** 96355

Comment Text: Due to the wilderness aspect of this area, helicopters or other forms of motorized access should not be used for any phase of this project.

Other Corresponding Codes: WI1000, WI4000

Correspondence Id: 9 **Comment Id:** 96287

Comment Text: The lakes and streams proposed for restoration in this project are some of the most pristine water bodies left in existence. Efforts to protect and restore them, as well as the native MYLF, are important, but need to be exceedingly gentle in nudging the ecosystems in a healthy direction. This may not create the "perfect" outcome of total extirpation of fish in all lakes, but can be sufficient to adequately protect MYLF and other indigenous species. The use of poisons and even electroshocking are too heavy-handed and could easily cause more harm than good. Efforts to restore MYLF should proceed in a timely manner, but the sense of urgency should not be inflated and used as an excuse to use counterproductive methods.

Other Corresponding Codes: PN8000

Correspondence Id: 1 **Comment Id:** 96204

Comment Text: An EIS is clearly required if SEKI would use chemical poisons for this project. Any such EIS must: (1) fully consider (and select) feasible alternatives to the use of chemical poisons, (2) carefully evaluate and fully disclose the impacts of chemical poisons, and (3) evaluate the cause(s) of the original amphibian decline before SEKI proposes to poison sensitive aquatic ecosystems.

Organization: Western Environmental Law Center

Other Corresponding Codes: AQU1000, AQU2000, AQU3000, GA1000, GA5000

Correspondence Id: 7 **Comment Id:** 96222

Comment Text: Within the scoping brochure, under “Preliminary Alternatives” delete “all” in the second sentence. There are other viable alternatives that the public comes up with that could be considered.

Correspondence Id: 18 **Comment Id:** 96353

Comment Text: What non-chemical alternatives are available? We urge the use of non-chemical means to the greatest extent possible.

Organization: Californians for Western Wilderness

Correspondence Id: 22 **Comment Id:** 96372

Comment Text: If alternatives exist that would provide habitat in other areas outside the MYLF project area, (i.e. other wilderness areas in the High Sierra) that could be achieved without the use of poisons, include this in your analysis.

Organization: Californians for Alternatives to Toxics

AL8000 Alternatives: Full disclosure of alternative components

Correspondence Id: 38 **Comment Id:** 96241

Comment Text: Past use of piscicides in backcountry waters has not been the best solution (e.g. rotenone use on Silver King creek, Little Kern River, Upper Truckee River and the S.F. Kern). Delineate what piscicides and precisely how they will be used and under what qualifications, so that alternatives 2 and 4 can be better evaluated.

Correspondence Id: 11 **Comment Id:** 96306

Comment Text: List exact formulations of poisons to be used, including all active and inactive ingredients by amount and percentage. Include composition of neutralization chemicals. Describe methods of application of poisons.

Organization: University of California, Davis

Correspondence Id: 11 **Comment Id:** 96309

Comment Text: Explain how drifting stream invertebrates that have absorbed rotenone and moved out of the project area will remain out of the food chain in areas not to be poisoned.

Organization: University of California, Davis

Other Corresponding Codes: AQU2000

Correspondence Id: 11 **Comment Id:** 96312

Comment Text: Discuss sources ("closest genetic forms available" referred to on p.3, column 2, Scoping Notice) for re-introduction of the MYLF after the frogs are extirpated by the poisoning.

Organization: University of California, Davis

Correspondence Id: 11 **Comment Id:** 96319

Comment Text: Provide location data and details on California Department of Fish and Game’s program "restoring" about a dozen lakes, as referred to in the Scoping Notice.

Organization: University of California, Davis

Correspondence Id: 11 **Comment Id:** 96317

Comment Text: Give detailed information on how the dead fish will be dealt with.

Organization: University of California, Davis

Correspondence Id: 13 **Comment Id:** 96363

Comment Text: Please demonstrate that quality fishing opportunities will continue to be available throughout the park.

Other Corresponding Codes: VE4000, VU4000

Correspondence Id: 14 **Comment Id:** 96257

Comment Text: California Trout's primary concern about the proposed action is to ensure that the public has an opportunity to provide comment and input into the NPS selection of lakes from which fish are to be removed. Providing a transparent and open process will allow the public to provide information that will help inform and strengthen the NPS's final decision and build the necessary support to ensure its successful execution.

Organization: California Trout

Correspondence Id: 18 **Comment Id:** 96347

Comment Text: How will backpackers and hikers be informed and become aware of the project so that they do not inadvertently consume water from poisoned lakes and streams?

Organization: Californians for Western Wilderness

Other Corresponding Codes: CC1000, MI1000, VE4000, VS4000

Correspondence Id: 18 **Comment Id:** 96348

Comment Text: How long will the chemicals persist? How will you ensure that they do not spread beyond their intended target waters?

Organization: Californians for Western Wilderness

Other Corresponding Codes: AQU1000, AQU2000, GA5000, MO1000

Correspondence Id: 2 **Comment Id:** 96234

Comment Text: Reveal the poison or formulation that you propose to use.

Organization: University of California, Davis

Correspondence Id: 7 **Comment Id:** 96221

Comment Text: What lakes are being considered for treatment?

Other Corresponding Codes: AQU1000, WQ3000

Correspondence Id: 9 **Comment Id:** 96280

Comment Text: The environmental assessment should make clear whether potassium permanganate is proposed for use to neutralize rotenone and make note of the fact that potassium permanganate does not neutralize other ingredients in rotenone-formulations, which continue to flow downstream of project areas and/or persist in lakes where it is applied.

Other Corresponding Codes: GA1000, GA2000

Correspondence Id: 11 **Comment Id:** 96303

Comment Text: Prepare a complete map of all lakes, streams, and springs that the NPS plans to poison.

Organization: University of California, Davis

Correspondence Id: 11 **Comment Id:** 96305

Comment Text: Present the schedule of poisoning by year and specify frequency of poisoning each habitat per year.

Organization: University of California, Davis

Correspondence Id: 18 **Comment Id:** 96352

Comment Text: Will pack animals be used? What impact will animals have on trails and streams (urination/defecation, stream erosion, grazing in meadows)?

Organization: Californians for Western Wilderness

Other Corresponding Codes: AQU2000, VE4000, VR4000, WI4000, WQ4000

Correspondence Id: 3 **Comment Id:** 96248

Comment Text: Before the public can reasonably comment on alternatives 2 and 4, it must be disclosed exactly what type of piscicides will be used, how they will be used, and under what qualifications. The project is an ambitious one that covers many extremes in watershed. It would be interesting to see examples of similar projects where piscicides were successfully used for long term fish control.

Organization: California School of Flyfishing

Correspondence Id: 3 **Comment Id:** 96249

Comment Text: We are in absolute favor of pursuing whatever management techniques are required to restore MYLF to their natural habitat. At the same time we are adamant that the entire process be kept honest and transparent.

Organization: California School of Flyfishing

Correspondence Id: 29 **Comment Id:** 96338

Comment Text: Which piscicides proposed for use are registered for use in the State of California and which are not (for example, to our knowledge antimycin is not registered)

Organization: Wilderness Watch

Other Corresponding Codes: PN11000

Correspondence Id: 29 **Comment Id:** 96342

Comment Text: Specify the amount of motorized intrusion, if any, which may be required under each alternative.

Organization: Wilderness Watch

Correspondence Id: 31 **Comment Id:** 96397

Comment Text: Provide a listing of the 30 to 85 lakes proposed for trout extermination because I believe the public should have some comment on the feasibility and fairness of the plan. The location and identity of the lakes is important, both with respect to aiding in MYLF recovery, and for striking a balance between

recreational resources (fishing) and MYLF recovery.

Organization: California State University, Fresno

Correspondence Id: 31 **Comment Id:** 96399

Comment Text: When fish eradication plans are finalized, there should be some way the public may obtain information on the specific lakes that will be targeted. Most backcountry hikers and anglers have precious few days we can spend in the Sierra. To find that the lakes one wanted to fish in one's only backpacking trip of the year are fishless after lots of hard hiking to reach them would be a very unpleasant experience.

Organization: California State University, Fresno

Other Corresponding Codes: CC1000, MI1000, VE4000, VU4000

AQU1000 Aquatic Habitat: Affected Environment

Correspondence Id: 7 **Comment Id:** 96224

Comment Text: Aquatic resources are not mentioned for "resource considerations."

Correspondence Id: 8 **Comment Id:** 96255

Comment Text: The introduction of nonnative trout into virtually all park watersheds has profoundly altered these aquatic ecosystems. Trout predation is well-documented to have caused the elimination of mountain yellow-legged frogs, garter snakes, and dozens of invertebrate species from many of the park's water bodies.

Organization: University of California, Sierra Nevada Aquatic Research Laboratory

Other Corresponding Codes: AQU2000, AQU3000

AQU2000 Aquatic Habitat: Impacts to Aquatic Ecosystems

Correspondence Id: 29 **Comment Id:** 96340

Comment Text: Describe the environmental impacts of each alternative on all species that would be affected, including the environmental effects of the "non-active" ingredients contained in piscicides including emulsifiers, solvents, dispersants and neutralizers, and the "life span" of these additive ingredients.

Organization: Wilderness Watch

Other Corresponding Codes: GA1000, WH4000

Correspondence Id: 29 **Comment Id:** 96325

Comment Text: Piscicides such as rotenone or antimycin are deadly to all gill-breathing creatures including aquatic macro-invertebrates, fish, and tadpoles. It is known that highly specialized endemic populations of macro-invertebrates often evolve in isolated locations. If localized endemic populations are eradicated due to a lake or stream poisoning project they quite likely will never "recover" because the entire population has been destroyed. Non-specialized, nonendemic species may eventually move into that niche but species that were endemic to a particular location will likely be lost forever.

Organization: Wilderness Watch

Other Corresponding Codes: II1000

Correspondence Id: 23 **Comment Id:** 96291

Comment Text: Poisoning rainbow trout without understanding the possible implications is not only foolhardy, but quite possibly detrimental to yellow-legged frogs themselves. It certainly could be detrimental

to other aquatic creatures besides rainbow trout, as well as anything that might feed on the poisoned fish.

Other Corresponding Codes: GA5000, WH4000

Correspondence Id: 1 **Comment Id:** 96201

Comment Text: SEKI must consider all readily available information. SEKI is required to consider all readily available information, not only that which may be available in published scientific literature. For example, Nancy Erman (retired, UC Davis) and David Herbst (Sierra Nevada Aquatic Research Laboratory) have reviewed the monitoring results for past similar poisoning projects in the Sierra Nevada. These experts have concluded that such poisoning projects result in significant and long-term impacts to aquatic ecosystems. Further, experts employed by the California Water Boards have concluded that such poisoning projects violate state water quality standards and otherwise result in significant effects. We assume that SEKI staff has assembled and considered such information regarding past stream and lake poisoning projects in the Sierra Nevada.

Organization: Western Environmental Law Center

Other Corresponding Codes: INF1000, WQ4000

Correspondence Id: 2 **Comment Id:** 96231

Comment Text: Some species will be highly sensitive to antimycin and will disappear; others will be less so. Some species will rapidly inhabit a recently vacated ecological niche and will expand in numbers.

Organization: University of California, Davis

Other Corresponding Codes: GA5000

Correspondence Id: 2 **Comment Id:** 96232

Comment Text: A study in California, South Fork of the Kern River, on drift of invertebrates following antimycin application showed major drift as a result of the poisoning (Stefferud 1977). Drift occurred as dead or dying invertebrates lost their hold on the bottom substrate and drifted in the water column. The data gathered in this study indicate that use of antimycin as a piscicide has a definite effect upon the aquatic invertebrate community in cold mountain streams (Stefferud 1977). Dead or dying tadpoles were also collected in the drift nets (Stefferud 1977).

Organization: University of California, Davis

Other Corresponding Codes: INF1000

Correspondence Id: 2 **Comment Id:** 96237

Comment Text: Antimycin clearly affects non-target species and probably eliminates some and, possibly many, invertebrates and amphibians. Some species may be permanently exterminated. No studies to date have proven that antimycin is harmless. Several studies have shown impacts to non-target animals and communities at broad taxonomic levels.

Organization: University of California, Davis

Other Corresponding Codes: INF1000, WH4000

Correspondence Id: 2 **Comment Id:** 96226

Comment Text: Antimycin, like the various formulations of rotenone, cannot be referred to merely as a "piscicide," thereby implying that it kills only fish. In fact, antimycin acts as a poison on many non-target organisms. It readily kills aquatic invertebrates and amphibians, as the EPA risk assessment has acknowledged.

Organization: University of California, Davis
Other Corresponding Codes: INF1000, WH4000

Correspondence Id: 5 **Comment Id:** 96205
Comment Text: The use of chemical poison(s) to remove fish from these water bodies would likely: (1) kill non-target fauna; (2) alter the natural color of water bodies; (3) create offensive odors and tastes in surface waters; (4) introduce noise; (5) introduce equipment, personnel, and other changes to natural ecosystems that would adversely affect the wilderness character; and (6) be highly controversial. Taken together, these impacts would constitute significant adverse effects to the environment, and an environmental impact statement (EIS) is clearly required for any such poisoning project(s).
Organization: High Sierra Hikers Association
Other Corresponding Codes: SC4000, SO4000, VE4000, VS4000, VU4000, WH4000, WI4000, WQ4000

Correspondence Id: 5 **Comment Id:** 96206
Comment Text: Chemical fish poisons are known to kill non-target animals, such as amphibians and aquatic invertebrates. Monitoring in other parts of the Sierra Nevada (i.e., Silver Creek and Silver King Creek at the Toiyabe National Forest) has shown that aquatic ecosystems are significantly affected by such poisoning projects, and that the adverse effects are long-lasting.
Organization: High Sierra Hikers Association
Other Corresponding Codes: AQU3000, WH4000

Correspondence Id: 5 **Comment Id:** 96208
Comment Text: Endemic species affected by the poisoning may be extirpated or become extinct.
Organization: High Sierra Hikers Association
Other Corresponding Codes: UI1000, WH4000

Correspondence Id: 5 **Comment Id:** 96207
Comment Text: Rare aquatic taxa (such as certain stoneflies) have failed to recover many years after such poisoning projects.
Organization: High Sierra Hikers Association
Other Corresponding Codes: AQU3000, INF1000

Correspondence Id: 8 **Comment Id:** 96256
Comment Text: Piscicides such as rotenone are effective at eliminating fish populations but also have negative effects on other gill-breathing organisms (e.g., aquatic invertebrates). Impacts on native species could likely be minimized through careful planning and piscicide application. However, given the potential for negative impacts, it is imperative that the park carefully monitor aquatic communities in the affected watersheds before and after the use of piscicides. The resulting information would provide a much-needed description of the ability of native species to recover from both the piscicide application and from the effects of fish predation. These results will be critically important in guiding the park in the development of subsequent fish removal projects that minimize short-term impacts and maximize long-term benefits.
Organization: University of California, Sierra Nevada Aquatic Research Laboratory
Other Corresponding Codes: MO1000, WH4000

Correspondence Id: 9 **Comment Id:** 96271

Comment Text: Actions taken to benefit MYLFs should not harm them. Therefore, no poisons should be used, and electro fishing should be discontinued, since both of these actions harm MYLF.

Other Corresponding Codes: GA5000, WH4000

Correspondence Id: 9 **Comment Id:** 96273

Comment Text: The chemical analysis of any piscicides should be known and disclosed and all ingredients (not just active ingredient) should be assessed for their persistence in soil and water and their potential to cause short-and long-term impacts to water and wildlife.

Other Corresponding Codes: WH4000, WQ4000

Correspondence Id: 9 **Comment Id:** 96279

Comment Text: The environmental assessment should acknowledge the long-term adverse impacts on macroinvertebrates following piscicide use that have been documented in scientific studies as well as in National Forest Service data obtained in previous California poisoning projects.

Other Corresponding Codes: GA1000, INF1000, TE4000, WH4000

Correspondence Id: 10 **Comment Id:** 96265

Comment Text: Use of piscicides poses a risk to the immediate area and downstream recipients. While chemical treatment is a preferred alternative because of its cost efficiency and effectiveness in rapid removal of non-native trout, chemical treatment is a modern technology that has not been perfected. Rotenone, though broken down quite quickly when exposed to sunlight, can result in high sun sensitivity when consumed by plants. Additionally, strong concentrations of the chemical could prolong the breakdown process, therefore posing a larger threat to plant or organism species that come in contact with the treated water. Also, concern should be given to other micro-organisms that could be negatively impacted by chemical treatment.

Organization: National Parks and Conservation Association

Other Corresponding Codes: AQU3000, WQ3000, WQ4000

Correspondence Id: 10 **Comment Id:** 96266

Comment Text: All potential environmental impacts to immediate and surrounding ecosystems must be evaluated prior to the implementation of alternative two or alternative four. While the ultimate goal is to remove non-native trout from the area, the other effects of chemical treatment on the plants, micro-organisms, and soils-factors that would assist in the restoration of the MYLF's habitat-should be evaluated.

Organization: National Parks and Conservation Association

Other Corresponding Codes: VR4000, WQ4000

Correspondence Id: 21 **Comment Id:** 96374

Comment Text: Manual removal does not impact non-target species uncontrollably (this is a serious concern about poisoning).

Other Corresponding Codes: GA5000, PN8000, UI1000

Correspondence Id: 21 **Comment Id:** 96376

Comment Text: The claim that effects of the poisoning are "temporary" is dubious at best. Anything short of "forever" could be termed "temporary." There are indications that in other poisoned areas in the Sierra Nevada, some populations such as stoneflies and other stream-dwelling fauna have failed to recover after many years. Fish poisons could leave significant long-term effects. One problem is that no one is really sure how long term.

Other Corresponding Codes: AQU3000, CA5000, INF1000, MO1000, UI1000

Correspondence Id: 11 **Comment Id:** 96295

Comment Text: We do not support the use of aquatic poisons in the park and wilderness area. So-called "piscicides" (formulations of rotenone compounds and antimycin compounds), kill many non-target species of aquatic invertebrates and amphibians, not just the targeted, unwanted fish. They have unintended effects that are not being acknowledged or evaluated by state and federal agencies. These poisons have long-term impacts on aquatic and terrestrial food webs, on aquatic animal communities, and may lead to extinction of some native, aquatic, non-target species. Aquatic poisons are controversial, and there is disagreement among experts regarding their harm and benefits. Aquatic poisons have a high probability of eliminating rare and endemic aquatic invertebrate species. Some species are highly specialized and restricted to narrow, localized habitats. The aquatic habitats in wilderness areas and national parks are likely to contain such species. Once removed by poisoning, such species may never recover.

Organization: University of California, Davis

Other Corresponding Codes: TE4000, WH4000

Correspondence Id: 11 **Comment Id:** 96297

Comment Text: The ecological risk assessment of rotenone states that rotenone is very highly toxic to fish and invertebrates on an acute exposure basis with median lethal concentration (LC50) values less than 10 ug/L and that the use of rotenone for fishery management at maximum application rates would likely eliminate both aquatic vertebrates and invertebrates in the treatment area. Although the lowest toxicity value for freshwater invertebrates (48-hr EC50=3.7 ug/L) was chosen for risk assessment purposes, it is likely that more sensitive invertebrates could be found in the wild. In this case, at maximum application rates, acute mortality of aquatic invertebrates would be expected. Despite the fact that invertebrates are less conspicuous members of the aquatic community, they are a major component of aquatic ecosystems and food webs.

Organization: University of California, Davis

Other Corresponding Codes: INF1000

Correspondence Id: 11 **Comment Id:** 96298

Comment Text: Any significant effects on invertebrates would most likely influence other components of the ecosystem. Effects may not be limited to merely a change in total biomass as a result of widespread mortality but any changes associated with differential sensitivity could bring about significant changes in the community structure, which could alter system function.

Organization: University of California, Davis

Other Corresponding Codes: GA1000, GA5000, II1000

Correspondence Id: 11 **Comment Id:** 96300

Comment Text: Applications of stream and lake poisons are difficult to control, often have unforeseen consequences, too often cause accidents, and produce residues outside of the project boundaries and/ or over a longer time than anticipated, as documented in California agency files and reports.

Organization: University of California, Davis

Other Corresponding Codes: GA1000, INF1000

Correspondence Id: 11 **Comment Id:** 96307

Comment Text: Analyze the food web effects of poisoning on terrestrial as well as aquatic communities. Include birds, amphibians, reptiles, mammals, and terrestrial invertebrates that depend on emerging insects for food as well as those that depend on aquatic invertebrate forms for food.

Organization: University of California, Davis

Other Corresponding Codes: GA5000, TE4000, VR4000, WH4000, WQ4000

Correspondence Id: 14 **Comment Id:** 96260

Comment Text: Although our policy does not address the use of physical removal, if the NPS employs gillnets and other equipment to remove fish, we urge that it take all precautions necessary (see, Fellers et al., 2001) to reduce the possibility of contaminating chytrid-free lakes with the pathogen.

Organization: California Trout

Other Corresponding Codes: MI1000

Correspondence Id: 27 **Comment Id:** 96253

Comment Text: Chemical fish poisons are toxic to all gill-breathing animals, and thus kill not only fish, but also the tadpoles of frogs and toads, as well as aquatic invertebrates that form the base of the food chain. Available data clearly indicate that fish poisons create significant long-term (and possibly permanent) effects.

Other Corresponding Codes: INF1000

AQU3000 Aquatic Habitat: Cumulative Effects

Correspondence Id: 22 **Comment Id:** 96369

Comment Text: Please include in your analysis all possible cumulative effects from the use of rotenone in relation to other stressors found in the SEKI MYLF project area.

Organization: Californians for Alternatives to Toxics

Other Corresponding Codes: CM1000, CM3000

Correspondence Id: 9 **Comment Id:** 96281

Comment Text: The cumulative impacts of piscicide use should be analyzed. This includes the identification of any historical use of piscicides in the project area, the impacts of multiple piscicide deployments in the same water body during the current project, as well as the combined impacts on MYLFs of piscicides, increasing temperatures and UV irradiation, chythrid fungus, and any other pollutants present in the project area.

CC1000 Consultation and Coordination: General Comments

Correspondence Id: 36 **Comment Id:** 96387

Comment Text: Coordinate with USFS.

Correspondence Id: 34 **Comment Id:** 96389

Comment Text: Make special efforts to engage the recreational fishing community so that they are fully on board and supportive of frog restoration.

Organization: U.S. Forest Service, Intermountain Region

CL1000 Climate Change: Climate change analysis

Correspondence Id: 9 **Comment Id:** 96276

Comment Text: The impacts of global warming should be taken into account in determining the best sites for MYLF restoration and the likelihood that restoration efforts in the Sequoia and Kings Canyon National Parks will be successful in the long run.

Correspondence Id: 7 **Comment Id:** 96216

Comment Text: Will global climate change have an impact on the mountain yellow-legged frog? If so, what would be the possible impacts?

CM2000 Cumulative Effects: Future Foreseeable Actions

Correspondence Id: 38 **Comment Id:** 96240

Correspondence Id: 3 **Comment Id:** 96245

Comment Text: If the frog goes extinct will fishless basins be returned to their current fishery status?

Organization: California School of Flyfishing

CM3000 Cumulative Effects: General cumulative effects analysis

Correspondence Id: 30 **Comment Id:** 96404

Comment Text: The NPS must use the CEQ's January 1997 document, "Considering Cumulative Effects Under the National Environmental Policy Act" for determining cumulative impacts and carrying out its analysis, assessment, and evaluation. It is clear that the NPS has an affirmative duty, a statutory duty, and a regulatory duty to carry out cumulative impacts assessment.

Correspondence Id: 11 **Comment Id:** 96308

Comment Text: Explain how the NPS will assess possible cumulative effects of chemicals in the aquatic pesticides in the food chain.

Organization: University of California, Davis

Correspondence Id: 30 **Comment Id:** 96403

Comment Text: All cumulative impacts must be considered in the EIS regarding the poisoning of 85 lakes in mostly wilderness areas.

Other Corresponding Codes: WI5000

GA1000 Impact Analysis: Impact Analyses

Correspondence Id: 29 **Comment Id:** 96324

Comment Text: The proposal to use poisons to remove fish poses significant impacts to a number of other species, including the MYLF. The limited analysis of an EA is therefore insufficient for evaluating this proposal and the more detailed analysis of an EIS is required.

Organization: Wilderness Watch
Other Corresponding Codes: ON1000

Correspondence Id: 28 **Comment Id:** 96290
Comment Text: Conduct an unbiased environmental assessment by a respected scientist on the impact the chytridomycosis fungus is having on the frogs and the ecosystem within the high mountain lakes before killing more trout.
Other Corresponding Codes: ON1000

Correspondence Id: 20 **Comment Id:** 96378
Comment Text: The use of poison will have too many deleterious effects. It is impossible to evaluate all the factors and life-forms involved and promise no negative results.
Other Corresponding Codes: UI1000

Correspondence Id: 9 **Comment Id:** 96286
Comment Text: Rotenone is a highly toxic mitochondrial poison whose mode of action is similar to antimycin. It is used to induce Parkinson-like illnesses in lab animals. Rotenone is more persistent in the environment than antimycin. Rotenone products are often formulated with toxic solvents such as trichloroethylene, xylene, trimethylbenzene, naphthalene, 1-m-naphthalene, 2m- naphthalene, toluene and a liver poison piperonyl butoxide (PBO). Piperonyl butoxide is a possible human carcinogen according to the EPA, and naphthalene and trichloroethylene are known to the state of California to cause cancer. CFT Legumine contains rotenone (active ingredient) 5%, other associated resins 5%, rotenolone (rotenone breakdown product), n-methyl-2-pyrrolidone, diethylene glycol ethyl ether, 1,3,5 - trimethylbenzene, sec-butylbenzene, nbutylbenzene, naphthalene, methyl naphthalene, p-isopropyl toluene. (Source: LFT Legumine label and analytical report submitted by California Dept of Fish & Game to the Lahontan Regional Water Quality Control Board on July 8, 2004). Both n-methyl pyrrolidone and diethylene glycol ethyl ether are reproductive toxins. N-methyl pyrrolidone is on the Proposition 65 list of chemicals known to the state of California to cause reproductive toxicity. The MSDS notes that this chemical is rapidly absorbed by the skin and may affect pregnancy and fetal development. There are no safe levels for developmental or reproductive toxins. NIOSH Registry of Toxic Effects of Chemical Substances (RTECS) lists diethylene glycol ethyl ether as a "mutagen, reproductive effector, and primary irritant". Naphthalene is classified as a possible human carcinogen by the U.s. EPA and is known by the State of California to cause cancer. There are no safe levels for carcinogens.
Other Corresponding Codes: INF1000, VS4000, WH4000

Correspondence Id: 9 **Comment Id:** 96278
Comment Text: Consideration needs to be given to the fact that the tadpole stage of MYLF can last for years and it is highly likely there would be mortalities if poisons are used. Identify the source of MYLFs that will be reintroduced to areas where they have been extirpated and methods that can be used to prevent the introduction of chytrid fungus.
Other Corresponding Codes: INF1000, TE4000, WH4000

Correspondence Id: 9 **Comment Id:** 96277
Comment Text: Chytrid fungus is identified as a threat to MYLF. Consideration needs to be given to the impact that using toxic chemicals in their environment might have on suppressing their immune systems and increasing their susceptibility to fungal infections.

Other Corresponding Codes: TE5000, WH4000

Correspondence Id: 9 **Comment Id:** 96274

Comment Text: Impacts analyzed need to address effects on reproduction, development, the immune and nervous systems, and ability to cause cancer and mutations. They should not rely solely on mortality end points (such as LD50 type analyses).

Other Corresponding Codes: VS4000

GA5000 Impact Analysis: General Impacts from Alternatives

Correspondence Id: 1 **Comment Id:** 96200

Comment Text: The use of chemical poison(s) to remove fish from these water bodies would likely: (l) kill non-target fauna, including rare and/or undiscovered endemic species; (2)alter the natural color of water bodies; (3) create offensive odors and tastes in surface waters; (4) introduce noise; (5) introduce equipment, personnel, and other changes to natural ecosystems that would adversely affect the wilderness character; and (6) be highly controversial in terms of environmental effects.

Organization: Western Environmental Law Center

Other Corresponding Codes: SC4000, SO4000, VR4000, VS4000, VU4000, WH4000, WI4000, WQ4000

Correspondence Id: 11 **Comment Id:** 96322

Comment Text: This single-species management approach ignores the aquatic community in which the MYLF evolved. It puts many non-target species at risk.

Organization: University of California, Davis

Other Corresponding Codes: UI1000, WH4000

INF1000 Informational: Available research and studies

Correspondence Id: 19 **Comment Id:** 96410

Comment Text: Provide updated information to the public on the progress of this effort for continued opportunity to modify any approved plan when and if deemed appropriate based on sound science and continued public feedback.

Other Corresponding Codes: MO1000

INF2000 Informational: Permit requirements

Correspondence Id: 9 **Comment Id:** 96283

Comment Text: An NPDES permit (National Pollutant Discharge Elimination System) needs to be obtained prior to any piscicide use.

ON1000 Other NEPA Issues: General Comments

Correspondence Id: 27 **Comment Id:** 96252

Comment Text: I want to register my support for Alternative 3 (Physical Treatment Only) which would remove non-native trout using manual methods only (i.e., gill nets, electroshockers). I oppose any use of chemical fish poisons in the SEKI Wilderness without detailed environmental analysis and more opportunities for public comments. An EIS must be prepared before SEKI considers any use of fish poisons.

Correspondence Id: 23 **Comment Id:** 96292

Comment Text: Apply proper scientific procedures and prepare an EIS, and provide a more realistic opportunity for public comment. If these actions cannot be taken then I suggest alternative 3 be selected, (physical removal methods only) for the eradication of non-native rainbow trout.

Correspondence Id: 11 **Comment Id:** 96302

Comment Text: Poisoning lakes and streams on public land requires preparation of an EIS (See Preliminary Injunction, US District Court, Eastern District of California, August 31, 2005).

Organization: University of California, Davis

Correspondence Id: 9 **Comment Id:** 96282

Comment Text: A joint Environmental Impact Statement (EIS) / Environmental Impact Report (EIR) must be prepared because of the documented long-term impacts to macroinvertebrates, and because, at the least, there is controversy among scientific experts as to these impacts, as well as extensive uncertainties regarding the impacts of using piscicides.

PN1000 Purpose And Need: Planning Process And Policy

Correspondence Id: 38 **Comment Id:** 96242

Comment Text: It has been pointed out that maintaining fishing opportunities in the park for non-native fish seems at odds with section 4.4.1.1 of NPS *Management Policies 2006*. Please comment on this apparent conflict.

Correspondence Id: 3 **Comment Id:** 96247

Comment Text: Why is the park interested in maintaining "fishing opportunities" (for non-native fishes) in approximately 500 lakes in violation of section 4.4.1.1? Why is the park promoting the act of fishing when it is illegal to hunt, pick a flower, or even remove a stone in a National Park? This seems to fly in the face of section 4.4.1. Our bigger question: is the MYLF being used as a convenient agent to rectify these apparent anomalies in your management plan?

Organization: California School of Flyfishing

Other Corresponding Codes: PN11000, PN8000

Correspondence Id: 16 **Comment Id:** 96379

Comment Text: The wilderness designation of the parks requires the highest standards of management. All manipulation of the environment is prohibited by the Wilderness Act, except the absolute minimum necessary to achieve the purposes of the Act. Remember, this exception is not to achieve the purposes or convenience of the managing agency, but the purposes of the Act: to maintain an enduring resource of wilderness. There is no exception to the Wilderness Act for convenience or cost!

Other Corresponding Codes: PN8000, WI1000

Correspondence Id: 11 **Comment Id:** 96301

Comment Text: This project is not an emergency or crisis. Fish have been in these habitats for many decades. Amphibians have been disappearing throughout many parts of the world in habitats with and without fish for twenty or more years.

Organization: University of California, Davis

Correspondence Id: 11 **Comment Id:** 96296

Comment Text: Management with non-specific poison is in contradiction to the principles of National Park Service *Management Policies 2006* as stated on p. 2, column 1, of your Scoping Notice.

Organization: University of California, Davis

Other Corresponding Codes: PN11000, PN4000, PN8000

PN11000 Purpose And Need: Other Policies And Mandates

Correspondence Id: 29 **Comment Id:** 96341

Comment Text: Discuss each alternatives' compatibility with the Clean Water Act and Wilderness Act

Organization: Wilderness Watch

Other Corresponding Codes: WI1000, WQ1000

PN8000 Purpose And Need: Objectives In Taking Action

Correspondence Id: 38 **Comment Id:** 96243

Comment Text: Is restoring the MYLF populations the true single intention of the proposal? Include information on past restoration failures.

Correspondence Id: 3 **Comment Id:** 96246

Comment Text: Is the MYLF restoration plan simply the first step in a bigger, hidden, agenda to rid the Park of nonnative fishes?

Organization: California School of Flyfishing

Correspondence Id: 16 **Comment Id:** 96380

Comment Text: Even assuming that removal of non-native fish will restore the native amphibian population, which could be interpreted as maintenance of wilderness character, poisons are not the minimum tool for this job.

Other Corresponding Codes: WI1000

Correspondence Id: 11 **Comment Id:** 96323

Comment Text: This proposal to poison aquatic systems does not show much understanding of "minimizing human impacts on native plants, animals, populations, communities, and ecosystems, and the processes that sustain them," that is stated in the Scoping Notice as one of the general principles guiding management aspects of NPS lands.

Organization: University of California, Davis

Correspondence Id: 2 **Comment Id:** 96227

Comment Text: It was never the intention of the Endangered Species Act to attempt to save one species while putting other species at risk of extinction. Therefore, whether or not all species of aquatic invertebrates and amphibians are present and survive the use of aquatic poisons must be examined in detail. Examine the long-term or permanent success rate of using aquatic poisons to "restore" the target species.

Organization: University of California, Davis

Other Corresponding Codes: WI4000

SO4000 Soundscapes: Impact of Proposal and Alternatives

Correspondence Id: 30 **Comment Id:** 96406

Comment Text: The use of chemical fish poisons in wilderness is a trammeling of wilderness and degrades wilderness character via the use or generation of noise, helicopters, chemicals, placement of warning signs, area closures, and killing of non-target animals.

Other Corresponding Codes: VE4000, VU4000, WH4000, WI1000, WI4000, WI5000

Correspondence Id: 29 **Comment Id:** 96332

Comment Text: Every alternative that is considered must specifically assess the impacts to wilderness character in accordance with the provisions and intent of the Wilderness Act, including the tangible and intangible qualities of wilderness character. Examples include the impacts to natural quiet, presence of large work crews onsite, intrusion of motorized equipment or aircraft, use of activities not allowed under the Wilderness Act (pesticides are not authorized under the Act), and any temporary closures that would affect opportunities for solitude or primitive and unconfined recreation.

Organization: Wilderness Watch

Other Corresponding Codes: WI4000

Correspondence Id: 21 **Comment Id:** 96377

Comment Text: The poisoning process would logistically and physically cause a major impact on the wilderness. Equipment and personnel, maybe even helicopters, could be used. Noise, chemicals, warning signs, area closures, and killing of native animals not targeted would damage wilderness character.

Other Corresponding Codes: WH4000, WI4000

VE4000 Visitor Experience: Impact Of Proposal And Alternatives

Correspondence Id: 16 **Comment Id:** 96383

Comment Text: The application process for the poisons would also seriously impact wilderness values. Tons of equipment and numerous personnel would likely be required. How can they be used in the wilderness without impacting the wilderness values with noise, the chemicals themselves (and don't forget the possibility of leaks and soil contamination), closures, and just the obvious presence of personnel and equipment engaged in a disruptive activity?

Other Corresponding Codes: VS4000, VU4000, WI1000, WI4000

Correspondence Id: 16 **Comment Id:** 96382

Comment Text: These proposed fish poisons contain solvents, emulsifiers, dispersants, synergists, and other additives that are potentially harmful to human health. These chemicals are known to persist for months, possibly even longer, in cold mountain lakes and many of their effects have not been tested. Thus, this proposal may adversely impact human visitors to the parks' wilderness, who rely on natural waters for consumption.

Other Corresponding Codes: VS4000, WQ4000

VS4000 Visitor Conflicts And Safety: Impact Of Proposal And Alternatives

Correspondence Id: 18 **Comment Id:** 96346

Comment Text: The park should address in its EIS the effects on human health of the chemicals it might use in poisoning the lakes.

Organization: Californians for Western Wilderness

WH4000 Wildlife And Wildlife Habitat: Impact Of Proposal And Alternatives

Correspondence Id: 18 **Comment Id:** 96345

Comment Text: Although the NPS says that the effects of poisoning are temporary, there are studies showing that populations of invertebrates and other fauna may never recover. Poisoning is a step that should be taken only as a last resort and only after great care and study.

Organization: Californians for Western Wilderness

Other Corresponding Codes: AL6000, AQU3000, CM3000, INF1000

Correspondence Id: 2 **Comment Id:** 96225

Comment Text: Two myths arise repeatedly in discussions of antimycin. One is that antimycin is an antibiotic (e.g., Dawson and Kolar 2003). The second is that it has no lasting impact on non-target species. We know of no record that antimycin has ever been registered with the FDA as an antibiotic for either human or veterinary use. It has been known since at least 1973 that it does not kill most bacteria, and is therefore not an antibiotic in the common sense (Lennon and Vezina 1973).

Organization: University of California, Davis

Other Corresponding Codes: GA5000, INF1000, WH4000

WI1000 Wilderness: Guiding Policies, Regs, Laws

Correspondence Id: 29 **Comment Id:** 96343

Comment Text: A minimum requirement analysis is needed to examine the "need" for each treatment tool under consideration and its compatibility with wilderness.

Organization: Wilderness Watch

Other Corresponding Codes: WI2000, WI4000

Correspondence Id: 24 **Comment Id:** 96408

Comment Text: The proposal to poison lakes and streams would make the SEKI Wilderness an extremely trammeled wilderness, and would seem to violate the Wilderness Act. The physical treatment-only option would have a far less trammeling effect on the SEKI Wilderness.

Other Corresponding Codes: WI4000

Correspondence Id: 23 **Comment Id:** 96293

Comment Text: Proceeding with a fish poisoning plan in wilderness areas without due consideration or oversight is breaking a measure of that trust and acting without full responsibility.

Correspondence Id: 18 **Comment Id:** 96351

Comment Text: How will the project and its scope affect the wilderness character of the parks? What equipment will be used? Will helicopters be used to shuttle staff and/or equipment? What impact will helicopters have on wilderness character? (A major impact is likely.)

Organization: Californians for Western Wilderness

Other Corresponding Codes: WI3000, WI4000

Correspondence Id: 5 **Comment Id:** 96209

Comment Text: Your environmental analysis must address the use of helicopters, which are generally prohibited within the SEKI Wilderness.

Organization: High Sierra Hikers Association

Other Corresponding Codes: WI4000

APPENDIX A – Correspondence Indexes

Table 5. Index of Organizations

Correspondence ID	Receipt Date	Name	Organization
Businesses			
3	3/16/2007	Cutter, Ralph and Lisa .	California School of Flyfishing
4	3/5/2007	Villavicencio, Dennis R.	Buckeye Tree Lodge and Sequoia Village, Inc.
15	2/5/2007	Boettger, Kenneth J.	Alpine WildSeed
Conservation/Preservation			
29	2/6/2007	Ekker, TinaMarie .	Wilderness Watch
1	11/3/2008	Frost, Peter M.	Western Environmental Law Center
10	2/10/2007	Whitehouse, Laura .	National Parks and Conservation Association
5	2/5/2007 and 2/16/2008	Browning, Peter .	High Sierra Hikers Association
18	2/6/2007	Painter, Michael J.	Californians for Western Wilderness
22	2/5/2007	Zimmerman, Dan .	Californians for Alternatives to Toxics
14	2/10/2007	Feierabend, J. Scott .	California Trout
Federal Government			
34	1/24/2007	Tait, Cynthia K.	U.S. Forest Service, Intermountain Region
University/Professional Society			
8	2/12/2007	Knapp, Roland A.	University of California, Sierra Nevada Aquatic Research Laboratory

2	4/30/2007	Erman, Nancy A.	University of California, Davis
11	2/8/2007	Erman, Nancy .	University of California, Davis
33	1/24/2007	Epanchin, Pete .	U.C. Davis
32	1/25/2007	Mahoney, R. Stephen .	Johnson & Wales University
31	1/26/2007	Wakabayashi, John .	California State University, Fresno

Table 6. Correspondence Index of Individual Commenters

Correspondence ID	Receipt Date	Name
7	2/14/2008	Bancroft, Larry .
27	2/12/2007	Barnett, Justin .
28	2/8/2007	Boothroyd, Bert T.
6	2/15/2008	Bowerman, Greg .
19	2/2/2007	Bowerman, Greg .
26	2/5/2007	Duba, Larry L.
17	2/6/2007	Fairchild, Stephanie M.
16	2/5/2007	Farrell, Phil .
20	2/5/2007	Foskett, MaryAnna .
21	2/5/2007	Hoover, Vicky .
12	2/6/2007	Larson, Gary .
30	2/1/2007	Mannchen, Brandt .
9	2/10/2007	McCampbell, Ann .
35	1/23/2007	Perlman, Janine .
24	2/1/2007	Proescholdt, Kevin .
23	2/8/2007	Schiller, Chris .
38	3/16/2007	Schramm, Steve .
25	1/31/2007	Thomas, William H.
36	1/23/2007	Unger, Arthur .
37	1/23/2007	Weece, Doyle D.
13	2/6/2007	Williams, Mike .

APPENDIX B – Index by Organization Type and Individuals

The Index by Org Type reports display the number of correspondence IDs that have coded comments associated with them. Each correspondence ID can be associated with multiple comments/codes and use the same code as another correspondence ID. Each correspondence ID is only counted once.

Table 7. Index by Organization Type - Businesses

Organization	Corr. ID	Code	Description
Alpine WildSeed	15	AE30000	Affected Environment: Baseline information
		AQU1000	Aquatic Habitat: Affected Environment
		INF1000	Informational: Available research and studies
		WI1000	Wilderness: Guiding Policies, Regs, Laws
Buckeye Tree Lodge and Sequoia Village, Inc.	4	AL6000	Alternatives: Degree to which alternatives meet project objectives
California School of Flyfishing	3	AL6000	Alternatives: Degree to which alternatives meet project objectives
		AL8000	Alternatives: Full disclosure of alternative components
		CM2000	Cumulative Effects: Future Foreseeable Actions
		MO1000	Monitoring: Monitoring and response plan for project success and/or failure
		PN1000	Purpose And Need: Planning Process And Policy
		PN11000	Purpose And Need: Other Policies And Mandates
		PN8000	Purpose And Need: Objectives In Taking Action

Table 8. Index by Organization Type - Organizations

Organization	Corr. ID	Code	Description
California Trout	14	AE30000	Affected Environment: Baseline information
		AL4000	Alternatives: New Alternatives Or Elements
		AL8000	Alternatives: Full disclosure of alternative components
		AQU1000	Aquatic Habitat: Affected Environment
		AQU2000	Aquatic Habitat: Impacts to Aquatic Ecosystems
		INF1000	Informational: Available research and studies
		MI1000	Mitigation: Suggested mitigation
Californians for Alternatives to Toxics	22	AE30000	Affected Environment: Baseline information
		AL4000	Alternatives: New Alternatives Or Elements
		AL6000	Alternatives: Degree to which alternatives meet project objectives
		AL7000	Alternatives: Full range of feasible alternatives considered

		AQU3000	Aquatic Habitat: Cumulative Effects
		CC1000	Consultation and Coordination: General Comments
		CM1000	Cumulative Effects: List of Actions
		CM3000	Cumulative Effects: General cumulative effects analysis
		INF1000	Informational: Available research and studies
Californians for Western Wilderness	18	AE10000	Affected Environment: Rare Or Unusual Vegetation
		AE11000	Affected Environment: Species Of Special Concern
		AE12000	Affected Environment: Wildlife And Wildlife Habitat
		AE30000	Affected Environment: Baseline information
		AL4000	Alternatives: New Alternatives Or Elements
		AL6000	Alternatives: Degree to which alternatives meet project objectives
		AL7000	Alternatives: Full range of feasible alternatives considered
		AL8000	Alternatives: Full disclosure of alternative components
		AQU1000	Aquatic Habitat: Affected Environment
		AQU2000	Aquatic Habitat: Impacts to Aquatic Ecosystems
		AQU3000	Aquatic Habitat: Cumulative Effects
		CC1000	Consultation and Coordination: General Comments
		CM3000	Cumulative Effects: General cumulative effects analysis
		GA1000	Impact Analysis: Impact Analyses
		GA5000	Impact Analysis: General Impacts from Alternatives
		II1000	Irretrievable Impacts: General Comments
		INF1000	Informational: Available research and studies
		MI1000	Mitigation: Suggested mitigation
		MO1000	Monitoring: Monitoring and response plan for project success and/or failure
		UI1000	Unavoidable Impacts: General Comments
		VE4000	Visitor Experience: Impact Of Proposal And Alternatives
		VR4000	Vegetation And Riparian Areas: Impact Of Proposal And Alternatives
		VS4000	Visitor Conflicts And Safety: Impact Of Proposal And Alternatives
		WH4000	Wildlife And Wildlife Habitat: Impact Of Proposal And Alternatives
		WI1000	Wilderness: Guiding Policies, Regs, Laws
		WI3000	Wilderness: Affected Environment
		WI4000	Wilderness: Impact of Proposal and Alternatives
		WQ4000	Water Resources: Impact Of Proposal And Alternatives
High Sierra Hikers Association	5	AL6000	Alternatives: Degree to which alternatives meet project objectives
		AQU2000	Aquatic Habitat: Impacts to Aquatic Ecosystems
		AQU3000	Aquatic Habitat: Cumulative Effects
		INF1000	Informational: Available research and studies
		SC4000	Scenic Resources: Impact of Proposal and Alternatives
		SO4000	Soundscapes: Impact of Proposal and Alternatives
		UI1000	Unavoidable Impacts: General Comments

		VE4000	Visitor Experience: Impact Of Proposal And Alternatives
		VS4000	Visitor Conflicts And Safety: Impact Of Proposal And Alternatives
		VU4000	Visitor Use: Impact Of Proposal And Alternatives
		WH4000	Wildlife And Wildlife Habitat: Impact Of Proposal And Alternatives
		WI1000	Wilderness: Guiding Policies, Regs, Laws
		WI4000	Wilderness: Impact of Proposal and Alternatives
		WQ4000	Water Resources: Impact Of Proposal And Alternatives
National Parks and Conservation Association	10	AE30000	Affected Environment: Baseline information
		AL4000	Alternatives: New Alternatives Or Elements
		AQU2000	Aquatic Habitat: Impacts to Aquatic Ecosystems
		AQU3000	Aquatic Habitat: Cumulative Effects
		VR4000	Vegetation And Riparian Areas: Impact Of Proposal And Alternatives
		WQ3000	Water Resources: Study Area
		WQ4000	Water Resources: Impact Of Proposal And Alternatives
Western Environmental Law Center	1	AL4000	Alternatives: New Alternatives Or Elements
		AL6000	Alternatives: Degree to which alternatives meet project objectives
		AL7000	Alternatives: Full range of feasible alternatives considered
		AQU1000	Aquatic Habitat: Affected Environment
		AQU2000	Aquatic Habitat: Impacts to Aquatic Ecosystems
		AQU3000	Aquatic Habitat: Cumulative Effects
		GA1000	Impact Analysis: Impact Analyses
		GA5000	Impact Analysis: General Impacts from Alternatives
		INF1000	Informational: Available research and studies
		PN8000	Purpose And Need: Objectives In Taking Action
		SC4000	Scenic Resources: Impact of Proposal and Alternatives
		SO4000	Soundscapes: Impact of Proposal and Alternatives
		VR4000	Vegetation And Riparian Areas: Impact Of Proposal And Alternatives
		VS4000	Visitor Conflicts And Safety: Impact Of Proposal And Alternatives
		VU4000	Visitor Use: Impact Of Proposal And Alternatives
		WH4000	Wildlife And Wildlife Habitat: Impact Of Proposal And Alternatives
		WI4000	Wilderness: Impact of Proposal and Alternatives
		WQ4000	Water Resources: Impact Of Proposal And Alternatives
Wilderness Watch	29	AE30000	Affected Environment: Baseline information
		AL4000	Alternatives: New Alternatives Or Elements
		AL6000	Alternatives: Degree to which alternatives meet project objectives
		AL7000	Alternatives: Full range of feasible alternatives considered
		AL8000	Alternatives: Full disclosure of alternative components
		AQU1000	Aquatic Habitat: Affected Environment
		AQU2000	Aquatic Habitat: Impacts to Aquatic Ecosystems

		GA1000	Impact Analysis: Impact Analyses
		II1000	Irretrievable Impacts: General Comments
		INF1000	Informational: Available research and studies
		ON1000	Other NEPA Issues: General Comments
		PN11000	Purpose And Need: Other Policies And Mandates
		PN8000	Purpose And Need: Objectives In Taking Action
		SO4000	Soundscapes: Impact of Proposal and Alternatives
		WH4000	Wildlife And Wildlife Habitat: Impact Of Proposal And Alternatives
		WI1000	Wilderness: Guiding Policies, Regs, Laws
		WI2000	Wilderness: Methodology and Assumptions
		WI4000	Wilderness: Impact of Proposal and Alternatives
		WQ1000	Water Resources: Guiding Policies, Regs And Laws
		WQ3000	Water Resources: Study Area

Table 9. Index by Organization Type – University/Professional Society

Organization	Corr. ID	Code	Description
California State University, Fresno	31	AE30000	Affected Environment: Baseline information
		AL4000	Alternatives: New Alternatives Or Elements
		AL6000	Alternatives: Degree to which alternatives meet project objectives
		AL8000	Alternatives: Full disclosure of alternative components
		CC1000	Consultation and Coordination: General Comments
		INF1000	Informational: Available research and studies
		MI1000	Mitigation: Suggested mitigation
		MO1000	Monitoring: Monitoring and response plan for project success and/or failure
		VE4000	Visitor Experience: Impact Of Proposal And Alternatives
		VU4000	Visitor Use: Impact Of Proposal And Alternatives
U.C. Davis	33	AE12000	Affected Environment: Wildlife And Wildlife Habitat
		AE30000	Affected Environment: Baseline information
		AL4000	Alternatives: New Alternatives Or Elements
		AL6000	Alternatives: Degree to which alternatives meet project objectives
		AQU1000	Aquatic Habitat: Affected Environment
		AQU2000	Aquatic Habitat: Impacts to Aquatic Ecosystems
		GA5000	Impact Analysis: General Impacts from Alternatives
		MO1000	Monitoring: Monitoring and response plan for project success and/or failure
		WH4000	Wildlife And Wildlife Habitat: Impact Of Proposal And Alternatives
University of California, Davis	2	AE11000	Affected Environment: Species Of Special Concern
		AE12000	Affected Environment: Wildlife And Wildlife Habitat
		AE30000	Affected Environment: Baseline information
		AL4000	Alternatives: New Alternatives Or Elements

		AL6000	Alternatives: Degree to which alternatives meet project objectives
		AL8000	Alternatives: Full disclosure of alternative components
		AQU1000	Aquatic Habitat: Affected Environment
		AQU2000	Aquatic Habitat: Impacts to Aquatic Ecosystems
		AQU3000	Aquatic Habitat: Cumulative Effects
		GA5000	Impact Analysis: General Impacts from Alternatives
		INF1000	Informational: Available research and studies
		MT1000	Miscellaneous Topics: General Comments
		PN8000	Purpose And Need: Objectives In Taking Action
		WH4000	Wildlife And Wildlife Habitat: Impact Of Proposal And Alternatives
		WH5000	Wildlife And Wildlife Habitat: Cumulative Impacts
		WI4000	Wilderness: Impact of Proposal and Alternatives
	11	AE30000	Affected Environment: Baseline information
		AL4000	Alternatives: New Alternatives Or Elements
		AL6000	Alternatives: Degree to which alternatives meet project objectives
		AL8000	Alternatives: Full disclosure of alternative components
		AQU1000	Aquatic Habitat: Affected Environment
		AQU2000	Aquatic Habitat: Impacts to Aquatic Ecosystems
		AQU3000	Aquatic Habitat: Cumulative Effects
		CM3000	Cumulative Effects: General cumulative effects analysis
		GA1000	Impact Analysis: Impact Analyses
		GA5000	Impact Analysis: General Impacts from Alternatives
		II1000	Irretrievable Impacts: General Comments
		INF1000	Informational: Available research and studies
		MI1000	Mitigation: Suggested mitigation
		MO1000	Monitoring: Monitoring and response plan for project success and/or failure
		ON1000	Other NEPA Issues: General Comments
		PN1000	Purpose And Need: Planning Process And Policy
		PN11000	Purpose And Need: Other Policies And Mandates
		PN4000	Purpose And Need: Park Legislation/Authority
		PN8000	Purpose And Need: Objectives In Taking Action
		TE4000	Threatened And Endangered Species: Impact Of Proposal And Alternatives
		UI1000	Unavoidable Impacts: General Comments
		VR4000	Vegetation And Riparian Areas: Impact Of Proposal And Alternatives
		WH4000	Wildlife And Wildlife Habitat: Impact Of Proposal And Alternatives
		WH5000	Wildlife And Wildlife Habitat: Cumulative Impacts
		WQ4000	Water Resources: Impact Of Proposal And Alternatives
University of California, Sierra Nevada Aquatic Research Laboratory	8	AQU1000	Aquatic Habitat: Affected Environment
		AQU2000	Aquatic Habitat: Impacts to Aquatic Ecosystems

	AQU3000	Aquatic Habitat: Cumulative Effects
	MO1000	Monitoring: Monitoring and response plan for project success and/or failure
	WH4000	Wildlife And Wildlife Habitat: Impact Of Proposal And Alternatives

Table 10. Index by Organization Type – Federal Agency

Organization	Corr. ID	Code	Description
U.S. Forest Service, Intermountain Region	34	AL5000	Management Preferred Alternative
		AL6000	Alternatives: Degree to which alternatives meet project objectives
		CC1000	Consultation and Coordination: General Comments
		GA5000	Impact Analysis: General Impacts from Alternatives

Table 11 Index by Organization Type – Unaffiliated Individuals

Corr. ID	Code	Description
6	AE30000	Affected Environment: Baseline information
	AL4000	Alternatives: New Alternatives Or Elements
	AL8000	Alternatives: Full disclosure of alternative components
	MI1000	Mitigation: Suggested mitigation
7	AE30000	Affected Environment: Baseline information
	AL6000	Alternatives: Degree to which alternatives meet project objectives
	AL7000	Alternatives: Full range of feasible alternatives considered
	AL8000	Alternatives: Full disclosure of alternative components
	AQU1000	Aquatic Habitat: Affected Environment
	CL1000	Climate Change: Climate change analysis
	GA1000	Impact Analysis: Impact Analyses
	INF1000	Informational: Available research and studies
	PN8000	Purpose And Need: Objectives In Taking Action
	WQ3000	Water Resources: Study Area
	WQ5000	Water Resources: Cumulative Impacts
9	AE30000	Affected Environment: Baseline information
	AL2000	Alternatives: Alternatives Eliminated
	AL4000	Alternatives: New Alternatives Or Elements
	AL7000	Alternatives: Full range of feasible alternatives considered
	AL8000	Alternatives: Full disclosure of alternative components
	AQU2000	Aquatic Habitat: Impacts to Aquatic Ecosystems
	AQU3000	Aquatic Habitat: Cumulative Effects
	CL1000	Climate Change: Climate change analysis
	GA1000	Impact Analysis: Impact Analyses
	GA2000	Impact Analysis: Use Trends And Assumptions
	GA5000	Impact Analysis: General Impacts from Alternatives
	INF1000	Informational: Available research and studies

	INF2000	Informational: Permit requirements
	MO1000	Monitoring: Monitoring and response plan for project success and/or failure
	ON1000	Other NEPA Issues: General Comments
	PN8000	Purpose And Need: Objectives In Taking Action
	TE4000	Threatened And Endangered Species: Impact Of Proposal And Alternatives
	VS4000	Visitor Conflicts And Safety: Impact Of Proposal And Alternatives
	WH4000	Wildlife And Wildlife Habitat: Impact Of Proposal And Alternatives
	WQ4000	Water Resources: Impact Of Proposal And Alternatives
12	AL4000	Alternatives: New Alternatives Or Elements
	WI1000	Wilderness: Guiding Policies, Regs, Laws
	WI3000	Wilderness: Affected Environment
	WI4000	Wilderness: Impact of Proposal and Alternatives
13	AE11000	Affected Environment: Species Of Special Concern
	AE30000	Affected Environment: Baseline information
	AL4000	Alternatives: New Alternatives Or Elements
	AL6000	Alternatives: Degree to which alternatives meet project objectives
	AL7000	Alternatives: Full range of feasible alternatives considered
	AL8000	Alternatives: Full disclosure of alternative components
	AQU1000	Aquatic Habitat: Affected Environment
	AQU2000	Aquatic Habitat: Impacts to Aquatic Ecosystems
	CM1000	Cumulative Effects: List of Actions
	CM3000	Cumulative Effects: General cumulative effects analysis
	GA1000	Impact Analysis: Impact Analyses
	GA5000	Impact Analysis: General Impacts from Alternatives
	INF1000	Informational: Available research and studies
	VE4000	Visitor Experience: Impact Of Proposal And Alternatives
	VU4000	Visitor Use: Impact Of Proposal And Alternatives
16	AE12000	Affected Environment: Wildlife And Wildlife Habitat
	AE30000	Affected Environment: Baseline information
	AL4000	Alternatives: New Alternatives Or Elements
	AQU1000	Aquatic Habitat: Affected Environment
	AQU2000	Aquatic Habitat: Impacts to Aquatic Ecosystems
	PN1000	Purpose And Need: Planning Process And Policy
	PN8000	Purpose And Need: Objectives In Taking Action
	VE4000	Visitor Experience: Impact Of Proposal And Alternatives
	VS4000	Visitor Conflicts And Safety: Impact Of Proposal And Alternatives
	VU4000	Visitor Use: Impact Of Proposal And Alternatives
	WI1000	Wilderness: Guiding Policies, Regs, Laws
	WI4000	Wilderness: Impact of Proposal and Alternatives
	WQ4000	Water Resources: Impact Of Proposal And Alternatives
17	AE30000	Affected Environment: Baseline information
	AL7000	Alternatives: Full range of feasible alternatives considered

	AQU2000	Aquatic Habitat: Impacts to Aquatic Ecosystems
	UI1000	Unavoidable Impacts: General Comments
	WH4000	Wildlife And Wildlife Habitat: Impact Of Proposal And Alternatives
	WI1000	Wilderness: Guiding Policies, Regs, Laws
	WI4000	Wilderness: Impact of Proposal and Alternatives
	WQ4000	Water Resources: Impact Of Proposal And Alternatives
19	AL2000	Alternatives: Alternatives Eliminated
	AL4000	Alternatives: New Alternatives Or Elements
	AL6000	Alternatives: Degree to which alternatives meet project objectives
	AL7000	Alternatives: Full range of feasible alternatives considered
	INF1000	Informational: Available research and studies
	MO1000	Monitoring: Monitoring and response plan for project success and/or failure
20	GA1000	Impact Analysis: Impact Analyses
	UI1000	Unavoidable Impacts: General Comments
21	AE30000	Affected Environment: Baseline information
	AQU1000	Aquatic Habitat: Affected Environment
	AQU2000	Aquatic Habitat: Impacts to Aquatic Ecosystems
	AQU3000	Aquatic Habitat: Cumulative Effects
	CM3000	Cumulative Effects: General cumulative effects analysis
	GA5000	Impact Analysis: General Impacts from Alternatives
	INF1000	Informational: Available research and studies
	MO1000	Monitoring: Monitoring and response plan for project success and/or failure
	PN8000	Purpose And Need: Objectives In Taking Action
	SO4000	Soundscapes: Impact of Proposal and Alternatives
	UI1000	Unavoidable Impacts: General Comments
	WH4000	Wildlife And Wildlife Habitat: Impact Of Proposal And Alternatives
	WI4000	Wilderness: Impact of Proposal and Alternatives
23	AQU2000	Aquatic Habitat: Impacts to Aquatic Ecosystems
	GA5000	Impact Analysis: General Impacts from Alternatives
	ON1000	Other NEPA Issues: General Comments
	WH4000	Wildlife And Wildlife Habitat: Impact Of Proposal And Alternatives
	WI1000	Wilderness: Guiding Policies, Regs, Laws
24	AE30000	Affected Environment: Baseline information
	AQU2000	Aquatic Habitat: Impacts to Aquatic Ecosystems
	AQU3000	Aquatic Habitat: Cumulative Effects
	GA5000	Impact Analysis: General Impacts from Alternatives
	II1000	Irretrievable Impacts: General Comments
	UI1000	Unavoidable Impacts: General Comments
	WI1000	Wilderness: Guiding Policies, Regs, Laws
	WI4000	Wilderness: Impact of Proposal and Alternatives
25	AE30000	Affected Environment: Baseline information
	AQU1000	Aquatic Habitat: Affected Environment

	AQU2000	Aquatic Habitat: Impacts to Aquatic Ecosystems
	AQU3000	Aquatic Habitat: Cumulative Effects
	GA5000	Impact Analysis: General Impacts from Alternatives
	II1000	Irretrievable Impacts: General Comments
26	AE30000	Affected Environment: Baseline information
	INF1000	Informational: Available research and studies
27	AL6000	Alternatives: Degree to which alternatives meet project objectives
	AQU2000	Aquatic Habitat: Impacts to Aquatic Ecosystems
	INF1000	Informational: Available research and studies
	ON1000	Other NEPA Issues: General Comments
28	AE30000	Affected Environment: Baseline information
	AL6000	Alternatives: Degree to which alternatives meet project objectives
	GA1000	Impact Analysis: Impact Analyses
	ON1000	Other NEPA Issues: General Comments
30	AE30000	Affected Environment: Baseline information
	AQU2000	Aquatic Habitat: Impacts to Aquatic Ecosystems
	CM3000	Cumulative Effects: General cumulative effects analysis
	GA5000	Impact Analysis: General Impacts from Alternatives
	II1000	Irretrievable Impacts: General Comments
	SO4000	Soundscapes: Impact of Proposal and Alternatives
	UI1000	Unavoidable Impacts: General Comments
	VE4000	Visitor Experience: Impact Of Proposal And Alternatives
	VS4000	Visitor Conflicts And Safety: Impact Of Proposal And Alternatives
	VU4000	Visitor Use: Impact Of Proposal And Alternatives
	WH4000	Wildlife And Wildlife Habitat: Impact Of Proposal And Alternatives
	WI1000	Wilderness: Guiding Policies, Regs, Laws
	WI4000	Wilderness: Impact of Proposal and Alternatives
	WI5000	Wilderness: Cumulative Effects
35	AL6000	Alternatives: Degree to which alternatives meet project objectives
36	AL4000	Alternatives: New Alternatives Or Elements
	AL6000	Alternatives: Degree to which alternatives meet project objectives
	CC1000	Consultation and Coordination: General Comments
	MO1000	Monitoring: Monitoring and response plan for project success and/or failure
38	AL6000	Alternatives: Degree to which alternatives meet project objectives
	AL8000	Alternatives: Full disclosure of alternative components
	CM2000	Cumulative Effects: Future Foreseeable Actions
	PN1000	Purpose And Need: Planning Process And Policy
	PN8000	Purpose And Need: Objectives In Taking Action

APPENDIX C – Index by Code

This table lists the commenters and topics commented on (identified by the codes used in this analysis). The report is organized by code, and under each code is a list of the commenters who submitted comments that fell under that code, and their correspondence numbers as assigned by the park. Those identified as N/A represent unaffiliated individuals.

Table 12. Index by Code

Code	Description	Organization	Corr. ID
AE10000	Affected Environment: Rare Or Unusual Vegetation	Californians for Western Wilderness	18
AE11000	Affected Environment: Species Of Special Concern	Californians for Western Wilderness	18
		University of California, Davis	2
		N/A	13
AE12000	Affected Environment: Wildlife And Wildlife Habitat	Californians for Western Wilderness	18
		U.C. Davis	33
		University of California, Davis	2
		N/A	16
AE30000	Affected Environment: Baseline information	Alpine WildSeed	15
		California State University, Fresno	31
		California Trout	14
		Californians for Alternatives to Toxics	22
		Californians for Western Wilderness	18
		National Parks and Conservation Association	10
		U.C. Davis	33
		University of California, Davis	2
			11
		Wilderness Watch	29
		N/A	6, 7, 9, 13, 16, 17, 21, 24, 25, 26, 28, 30
AL2000	Alternatives: Alternatives Eliminated	*N/A*	9, 19
AL4000	Alternatives: New Alternatives Or Elements	California State University, Fresno	31
		California Trout	14
		Californians for Alternatives to Toxics	22
		Californians for Western Wilderness	18
		National Parks and Conservation Association	10
		U.C. Davis	33
		University of California, Davis	2

			11
		Western Environmental Law Center	1
		Wilderness Watch	29
		N/A	6, 9, 12, 13, 16, 19, 36
AL5000	Management Preferred Alternative	U.S. Forest Service, Intermountain Region	34
AL6000	Alternatives: Degree to which alternatives meet project objectives	Buckeye Tree Lodge and Sequoia Village, Inc.	4
		California School of Flyfishing	3
		California State University, Fresno	31
		Californians for Alternatives to Toxics	22
		Californians for Western Wilderness	18
		High Sierra Hikers Association	5
		U.C. Davis	33
		U.S. Forest Service, Intermountain Region	34
		University of California, Davis	2
			11
		Western Environmental Law Center	1
		Wilderness Watch	29
		N/A	7, 13, 19, 27, 28, 35, 36, 38
AL7000	Alternatives: Full range of feasible alternatives considered	Californians for Alternatives to Toxics	22
		Californians for Western Wilderness	18
		Western Environmental Law Center	1
		Wilderness Watch	29
		N/A	7, 9, 13, 17, 19
AL8000	Alternatives: Full disclosure of alternative components	California School of Flyfishing	3
		California State University, Fresno	31
		California Trout	14
		Californians for Western Wilderness	18
		University of California, Davis	2
			11
		Wilderness Watch	29
		N/A	6, 7, 9, 13, 38
AQU1000	Aquatic Habitat: Affected Environment	Alpine WildSeed	15
		California Trout	14
		Californians for Western Wilderness	18
		U.C. Davis	33

		University of California, Davis	2
			11
		University of California, Sierra Nevada Aquatic Research Laboratory	8
		Western Environmental Law Center	1
		Wilderness Watch	29
		N/A	7. 13, 16, 21, 25
AQU2000	Aquatic Habitat: Impacts to Aquatic Ecosystems	California Trout	14
		Californians for Western Wilderness	18
		High Sierra Hikers Association	5
		National Parks and Conservation Association	10
		U.C. Davis	33
		University of California, Davis	2
			11
		University of California, Sierra Nevada Aquatic Research Laboratory	8
		Western Environmental Law Center	1
		Wilderness Watch	29
		N/A	9, 13, 16, 17, 21 23, 24 25, 27 30
AQU3000	Aquatic Habitat: Cumulative Effects	Californians for Alternatives to Toxics	22
		Californians for Western Wilderness	18
		High Sierra Hikers Association	5
		National Parks and Conservation Association	10
		University of California, Davis	2
			11
		University of California, Sierra Nevada Aquatic Research Laboratory	8
		Western Environmental Law Center	1
		N/A	9, 21, 24, 25
CC1000	Consultation and Coordination: General Comments	California State University, Fresno	31
		Californians for Alternatives to Toxics	22
		Californians for Western Wilderness	18
		U.S. Forest Service, Intermountain Region	34
		N/A	36
CL1000	Climate Change: Climate change analysis	*N/A*	7, 9

CM1000	Cumulative Effects: List of Actions	Californians for Alternatives to Toxics	22
		N/A	13
CM2000	Cumulative Effects: Future Foreseeable Actions	California School of Flyfishing	3
		N/A	38
CM3000	Cumulative Effects: General cumulative effects analysis	Californians for Alternatives to Toxics	22
		Californians for Western Wilderness	18
		University of California, Davis	11
		N/A	13, 21, 30
GA1000	Impact Analysis: Impact Analyses	Californians for Western Wilderness	18
		University of California, Davis	11
		Western Environmental Law Center	1
		Wilderness Watch	29
		N/A	7, 9, 13, 20, 28
GA2000	Impact Analysis: Use Trends And Assumptions	*N/A*	9
GA5000	Impact Analysis: General Impacts from Alternatives	Californians for Western Wilderness	18
		U.C. Davis	33
		U.S. Forest Service, Intermountain Region	34
		University of California, Davis	2
			11
		Western Environmental Law Center	1
		N/A	9, 13, 21, 23, 24, 25, 30
II1000	Irretrievable Impacts: General Comments	Californians for Western Wilderness	18
		University of California, Davis	11
		Wilderness Watch	29
		N/A	24, 25 30
INF1000	Informational: Available research and studies	Alpine WildSeed	15
		California State University, Fresno	31
		California Trout	14
		Californians for Alternatives to Toxics	22
		Californians for Western Wilderness	18
		High Sierra Hikers Association	5
		University of California, Davis	2
			11
		Western Environmental Law Center	1
		Wilderness Watch	29
		N/A	7, 9, 13,

			19, 21, 26, 27
INF2000	Informational: Permit requirements	*N/A*	9
MI1000	Mitigation: Suggested mitigation	California State University, Fresno	31
		California Trout	14
		Californians for Western Wilderness	18
		University of California, Davis	11
		N/A	6
MO1000	Monitoring: Monitoring and response plan for project success and/or failure	California School of Flyfishing	3
		California State University, Fresno	31
		Californians for Western Wilderness	18
		U.C. Davis	33
		University of California, Davis	11
		University of California, Sierra Nevada Aquatic Research Laboratory	8
		N/A	9, 19, 21, 36
MT1000	Miscellaneous Topics: General Comments	University of California, Davis	2
ON1000	Other NEPA Issues: General Comments	University of California, Davis	11
		Wilderness Watch	29
		N/A	9, 23, 27, 28
PN1000	Purpose And Need: Planning Process And Policy	California School of Flyfishing	3
		University of California, Davis	11
		N/A	16, 38
PN11000	Purpose And Need: Other Policies And Mandates	California School of Flyfishing	3
		University of California, Davis	11
		Wilderness Watch	29
PN4000	Purpose And Need: Park Legislation/Authority	University of California, Davis	11
PN8000	Purpose And Need: Objectives In Taking Action	California School of Flyfishing	3
		University of California, Davis	2
			11
		Western Environmental Law Center	1
		Wilderness Watch	29
		N/A	7, 9, 16, 21, 38
SC4000	Scenic Resources: Impact of Proposal and Alternatives	High Sierra Hikers Association	5
		Western Environmental Law Center	1
SO4000	Soundscapes: Impact of Proposal and Alternatives	High Sierra Hikers Association	5
		Western Environmental Law Center	1

		Wilderness Watch	29
		N/A	21, 30
TE4000	Threatened And Endangered Species: Impact Of Proposal And Alternatives	University of California, Davis	11
		N/A	9
UI1000	Unavoidable Impacts: General Comments	Californians for Western Wilderness	18
		High Sierra Hikers Association	5
		University of California, Davis	11
		N/A	17, 20, 21, 24, 30
VE4000	Visitor Experience: Impact Of Proposal And Alternatives	California State University, Fresno	31
		Californians for Western Wilderness	18
		High Sierra Hikers Association	5
		N/A	13, 16, 30
VR4000	Vegetation And Riparian Areas: Impact Of Proposal And Alternatives	Californians for Western Wilderness	18
		National Parks and Conservation Association	10
		University of California, Davis	11
		Western Environmental Law Center	1
VS4000	Visitor Conflicts And Safety: Impact Of Proposal And Alternatives	Californians for Western Wilderness	18
		High Sierra Hikers Association	5
		Western Environmental Law Center	1
		N/A	9, 16, 30
VU4000	Visitor Use: Impact Of Proposal And Alternatives	California State University, Fresno	31
		High Sierra Hikers Association	5
		Western Environmental Law Center	1
		N/A	13, 16, 30
WH4000	Wildlife And Wildlife Habitat: Impact Of Proposal And Alternatives	Californians for Western Wilderness	18
		High Sierra Hikers Association	5
		U.C. Davis	33
		University of California, Davis	2, 11
		University of California, Sierra Nevada Aquatic Research Laboratory	8
		Western Environmental Law Center	1
		Wilderness Watch	29
		N/A	9, 17, 21, 23, 30
WH5000	Wildlife And Wildlife Habitat: Cumulative Impacts	University of California, Davis	2, 11

WI1000	Wilderness: Guiding Policies, Regs, Laws	Alpine WildSeed	15
		Californians for Western Wilderness	18
		High Sierra Hikers Association	5
		Wilderness Watch	29
		N/A	12, 16, 17, 23, 24, 30
WI2000	Wilderness: Methodology and Assumptions	Wilderness Watch	29
WI3000	Wilderness: Affected Environment	Californians for Western Wilderness	18
		N/A	12
WI4000	Wilderness: Impact of Proposal and Alternatives	Californians for Western Wilderness	18
		High Sierra Hikers Association	5
		University of California, Davis	2
		Western Environmental Law Center	1
		Wilderness Watch	29
		N/A	12, 16, 17, 21, 24, 30
WI5000	Wilderness: Cumulative Effects	*N/A*	30
WQ1000	Water Resources: Guiding Policies, Regs And Laws	Wilderness Watch	29
WQ3000	Water Resources: Study Area	National Parks and Conservation Association	10
		Wilderness Watch	29
		N/A	7
WQ4000	Water Resources: Impact Of Proposal And Alternatives	Californians for Western Wilderness	18
		High Sierra Hikers Association	5
		National Parks and Conservation Association	10
		University of California, Davis	11
		Western Environmental Law Center	1
		N/A	9, 16, 17
WQ5000	Water Resources: Cumulative Impacts	*N/A*	7