



## Scenic Vista Management Plan

Public Comment and Response Report

December 2010



THIS PAGE INTENTIONALLY LEFT BLANK

## Table of Contents

<b>Introduction .....</b>	<b>1</b>
<b>Public Comment Analysis Methodology .....</b>	<b>1</b>
<b>Using this Report.....</b>	<b>1</b>
<b>Comments and Responses .....</b>	<b>3</b>
Air Quality .....	3
Planning Process.....	3
Relationship to Other Planning Efforts .....	4
Public Involvement .....	6
Proposed Alternatives .....	7
Alternatives.....	8
Cost of Implementation .....	9
Vegetation .....	10
Wildlife .....	14
Scenic Resources .....	15
Cultural Resources.....	17
<b>Out of Scope Comments .....</b>	<b>18</b>

THIS PAGE INTENTIONALLY LEFT BLANK

## Introduction

This report summarizes public comments submitted on the *Scenic Vista Management Plan Environmental Assessment* (Scenic Vista Management Plan EA). The Scenic Vista Management Plan EA was released for public review on August 9, 2010, and the National Park Service accepted comments through September 17, 2010. Public comments were received by fax and U.S. mail, and online through the Planning, Environment, and Public Comment (PEPC) website. During the comment period, 40 public comment letters were received with a total of 29 unique concerns. This report provides a summary of public concerns expressed in those comment letters as well as responses to substantive comments.

## Public Comment Analysis Methodology

Public comment letters received during the comment period were reviewed and analyzed in a series of stages which required review and assessment by staff. Each letter was read to determine discrete points expressed by the author, each of which is considered to be a comment. Each discrete comment was “coded” in order to associate that comment with a particular resource topic, or element of the plan (such as cultural resources or the plan’s relationship to other projects).

After all individual comments were coded and those of similar context were grouped together, a unique concern statement was developed to represent comments. The concern statements were framed to express public requests for action to be taken by the National Park Service (NPS). The concern statements were then screened to determine whether or not further clarification is needed, or whether modification of the proposed action is necessary. In the latter case, concerns were brought to park management for further deliberation.

Lastly, the planning team prepared responses to concern statements that are considered substantive. Substantive comments are those that:

- question, with reasonable basis, the accuracy of information in the EA;
- question, with reasonable basis, the accuracy of environmental analysis;
- develop and evaluate reasonable alternatives other than those presented in the EA;
- cause changes to the proposal or alternatives; and,
- suggest factual corrections.

All comments received during the public comment period were considered and are now part of the administrative record for this comment letters can be viewed on the park’s web site at <http://www.nps.gov/yose/parkmgmt/sv-info.htm>.

## Using this Report

This report presents public concerns arranged by topic, along with a representative sample of supporting quotes. The following list of acronyms has been developed to assist the reader in reviewing the report.

## **List of Acronyms**

EA	Environmental Assessment
EIS	Environmental Impact Statement
FMP	Fire Management Plan
FONSI	Finding of No Significant Impact
GMP	General Management Plan
MRP	Merced River Plan
NEPA	National Environmental Policy Act
NPS	National Park Service
ROD	Record of Decision
SVMP	Scenic Vista Management Plan
TRP	Tuolumne River Plan
USFS	United States Forest Service

## Comments and Responses

### Air Quality

**Concern 1: The NPS should use mitigation methods including mechanical treatment and/or removal of fuels from planned burns, to avoid adverse effects to air quality.**

*“...Although the proposed Alternatives identified in the Plan limit the use of prescribed burning to clear the various vistas and refers to the Yosemite Fire Management Plan (FMP) as the guidance document, the District asks the NPS to take a proactive role in reducing both the amount and impact of smoke. Proactive mitigation, including mechanical treatment and/or removal of fuels from planned burns, where possible, as well as, following through on the commitment to follow Title 17 of the California Code of Regulations (further discussed below), will reduce both the amount and impact of smoke....”*

(Conservation Organization; Correspondence #33)

*“...Specific impacts on air quality will be dependent on the method used for disposing the accumulated natural vegetation. Though it is important to maintain scenic vistas, maintain property in a fire safe condition, and preserve wildlife habitat, the disposal method selected can adversely affect local and regional air pollution...”*

(Conservation Organization; Correspondence #33)

**Response:** The plan list several alternative methods to disposal of biomass on pages II-9 and 10 and will consider any option that minimizes impacts and does not require additional compliance at the time a vista is managed.

### Planning Process

**Concern 2: The NPS should closely examine the effect of the Scenic Vista Management Plan (SVMP) on the Hetch Hetchy area.**

*“...The Park Service's pending Scenic Vista Management Plan presumably has thus far received little input concerning the Hetch Hetchy Valley...”*

(Business; Correspondence #12)

**Response:** Several vista points in the Hetch Hetchy area have been assessed under the plan and listed with other sites in Appendix E. As a programmatic plan, it is stated under “Actions Common to All” that new sites would be evaluated if suggested and considered for treatment as well.

**Concern 3: The NPS should complete management plans prior to initiating other plans that potentially tier off of them.**

*“...Decentralization of the planning process remains a concern. Though we understand that a Park Leadership Team meets regularly to provide a measure of planning oversight, the rapid-fire proliferation of plans released by various divisions-most of them follow-on plans that appear to be tiring from yet-to-be completed management plans (e.g., MRP, TRP, outdated Wilderness Management Plan, etc.)-is troubling. Not only is it challenging for an interested public trying to keep up with the multitude of comment requests, but there seems to be no logical progression or flow.”*

(Conservation Organization; Correspondence #30)

*“...The SVMP ‘tiers off the 1980 GMP.’ We recognize that the 1980 GMP is currently a legally valid management plan, but we also recognize that the long overdue MRP (and TRP) will amend the GMP, most likely resulting in an upward trend of protecting and enhancing ecosystems. Therefore, analyzing SVMP actions based on the existing GMP is inadequate-especially when 65% of the work and large volumes of trees are being considered for removal along the Yosemite Valley and El Portal segments of the Merced River...”*

(Conservation Organization; Correspondence #30)

**Response:** The SVMP must rely on the valid comprehensive and general management plans for Yosemite National Park that currently exist. Actions in areas that could be addressed under comprehensive plans currently underway, such as the Merced and Tuolumne Wild and Scenic River Comprehensive Management Plans, will not be undertaken until compliance with these plans is able to be determined.

**Relationship to Other Planning Efforts**

**Concern 4: The NPS should implement proposed actions in the Merced River and Tuolumne River corridors after there is a legally valid comprehensive management plan in place.**

*“...As per the Settlement Agreement: ‘The Settling Parties agree that the NPS will develop new elements for ...WSRA requirements that will be incorporated into the new [MRP] ...’ specifically mentioned are ‘Outstandingly Remarkable Values.’ The draft ORV Report for the new MRP was issued in June, closing public comment on July 31. ...the draft ORV Report that currently exists for the new MRP-though admittedly an exercise in testing the waters-is certainly not ready to serve as a stand-alone document to be used in analyzing proposed SVMP actions. ‘Scenic’ is a proposed ORV, one of five central to protection of the Merced River; it has not been finalized and as the SVMP states ‘will not be resolved until the Record of Decision (ROD) is signed.’ How can the Scenic ORV be protected absent a finalized definition, condition assessment report, and measurable goals and objectives? Both of these fundamental elements of the MRP planning process appear to be in disarray and are far from being ready to serve as reliable*



*documents upon which SVMP actions can be analyzed... ”*  
(Conservation Organization; Correspondence #30)

*“... We cannot support such a loosely framed list of changeable possibilities that depend on yet-to-be completed Merced and Tuolumne River Comprehensive Management Plan... The SVMP ‘... will derive its overall guidance from both the Merced [MRP] and Tuolumne River Plans [TRP], once they are completed... Actions for vista management will be done in accordance with these plans.’ If the premise of the SVMP is to derive its overall guidance from nonexistent plans (i.e., MRP, TRP), then it would seem the entire premise is flawed. The Plan acknowledges that 65% of identified vistas fall within the Lower Montane Forest and that at this elevation ‘removal of larger volumes of trees could take place ....’ The Lower Montane Forest largely represents the Yosemite Valley and the El Portal portions of the Merced River Corridor. If approved, the SVMP will implement the preferred alternative in fall of 2010; yet the MRP, which will outline the ‘overall goals for protecting and enhancing scenic values,’ determine land uses, restoration, and levels of facilities, and provide overall guidance to the SVMP isn’t scheduled for completion until at least 2013-three years later. This makes no sense. All work in the Merced River Corridor needs to be placed on hold until there is a legally valid comprehensive management plan in place for the Merced River...”*  
(Conservation Organization; Correspondence #30)

**Response:** Proposed actions that do not rely on guidance from river management plans, may be implemented upon initiation, approval and public posting of annual work plans. The proposed actions would occur in localized areas within habitats, vegetative zones, and natural and cultural resources described in the Affected Environment chapter of the EA. The potential resource impacts of such actions and associated mitigations have been analyzed in this EA and actions within the respective river corridor will not be undertaken until compliance with the river management plan is able to be determined.

**Concern 5: The NPS should evaluate cumulative impacts.**

*“...The environmental process is designed to look at the cumulative impacts of all proposed activities in a given area. To do these plans piecemeal does not address the cumulative impacts of all projects proposed by NPS...”*  
(Individual; Correspondence #22)

*“...Cumulative impacts need to be evaluated as part of a holistic process, not piecemeal. One is reminded of the 1997 VIP which separated out the Lodge Plan, the Employee Housing Plan and the Falls Corridor Plan until the Courts ruled in favor of development of a Comprehensive Yosemite Valley Plan where all projects were considered together to ensure a thorough evaluation of cumulative impacts...”*  
(Conservation Organization; Correspondence #30)

**Response:** Cumulative impacts of past, present and reasonably foreseeable actions related to vista are considered for all alternatives under each topic in Chapter III. Future plans will evaluate impacts related to vista management.

**Concern 6: The NPS should restore scenic vistas but separate the effort from the Fire Management Plan.**

*“...It would be easier to accept the fuels management plans if the conversion of Yosemite trees to merchantable lumber were not part of the equation... If large trees are going to be taken out for vista management purposes, that is one thing. It is entirely something else if they are to be taken out as part of a fuels reduction program. Especially if they are to be converted to cash at the lumber mill...”*  
(Conservation Organization; Correspondence #34)

*“...Please continue with your efforts to protect and restore scenic resources in Yosemite, but please separate these efforts from the Fire Management Plan. So long as the two plans are commingled, the SVMP will be suspect...”*  
(Conservation Organization; Correspondence #34)

**Response:** The purpose and need of the FMP and the SVMP are different. The proposed actions and affected environment components of both plans are related, regarding the removal of vegetation. Additionally, the FMP represents a thorough analysis of the structure and composition of healthy forests within Yosemite National Park, and this information is applied in the proposed actions of the SVMP. The relationship of these plans is discussed further in Chapter I, “Park Planning Context.”

**Public Involvement**

**Concern 7: The NPS should keep the public informed of management activities including making annual work plans available for review.**

*“... [We] encourage Park staff to make every effort to keep the public informed of management activities that may appear to be destructive and unnecessary. Before and during treatment of a particular vista point begins, informative signage should be placed at the site explaining the purpose of the project. Additionally, once the work plan for each year of treatment is completed, it should be easily accessible on the Park website as well as posted at the Visitor Center...”*  
(Conservation Organization; Correspondence #13)

*“... We are thoroughly familiar with and fully support vegetation management techniques (e.g., clearing understory, trimming, thinning, etc.) as critical to facilitating the management of wildfires, restoring watersheds, and enhancing the overall health of the ecosystem. We recognize Park management's interest in doing the same. However, we believe that this Scenic Vista Management Plan (SVMP) is a step too far. In essence, planners are asking the public to sign off on a blank check, without knowing any details or specifics, thereby giving the Park free license to clear and/or cut down ‘large volumes of trees’ in the name of managing scenic vistas...though the Plan mentions that final annual work plans will be released to the public for viewing before work commences (i.e., posted on Park website, E-newsletter), there appears to be no process whereby the public will be encouraged to comment on (or protest) a proposed work plan...”*  
(Conservation Organization; Correspondence #30)

*“...We continue to be concerned with the lack of interaction, on-going communication, and dialogue between Resource Management staff and the general public. We believe that exposure to the research activities and expertise of RMS staff would be of tremendous benefit to the public in enhancing their knowledge and understanding of the Park's natural resource function while also fostering good will. Whether it is through monthly e-newsletters, e-updates, interactive message forums, or some other vehicle, establishing a dialogue with the public in 'layman's-speak' would be invaluable in gaining support for RMS objectives...”*

(Conservation Organization; Correspondence #30)

**Response:** Review of the annual work plan is described in more detail in Chapter II, “Actions Common to All, Annual Work Plans” with a schematic schedule in Appendix D. The annual work plans will be posted on the Yosemite website at least 30 days prior to work beginning to give the public an opportunity to express concerns with park staff. Tribes and tribal groups will be notified and consulted with regarding each annual work plan. Factsheets on the plan are made available in the Visitors Center. Temporary signage at work sites is an idea that will be pursued and implemented if traffic enforcement allows it.

## **Proposed Alternatives**

### **Concern 8: The NPS should remove non-native plants rather than restore vistas.**

*“...If you would like for Yosemite to be a natural place for people to visit. Do nothing, except removing non native plants. Do not 'manage the environment'. Raze all that has been built by man.... You should guard Yosemite from yourself, damage resulting from Pack Outfits, stop encouraging visitation, and should revoke all concessionaires' contracts.”*

(Individual; Correspondence #10)

**Response:** The purpose and need for the SVMP is identified and discussed in Chapter I. The encroachment of conifers on documented vistas in Yosemite National Park indicates that vegetative conditions have changed compared with those that existed for thousands of years. This encroachment is due to past management practices, such as fire suppression, that created favorable conditions in more locations for the native conifers. One of the goals of the SVMP is to manage vistas in concert with the natural processes. Non-native plants are not obscuring vistas in most locations, but removing non-native invasive species and replanting with native species (within the scope of vista management), contributes to ecosystem health and stability.

### **Concern 9: The SVMP should propose the same number of vistas across all of the action alternatives.**

*“...An attempt to analyze differences among the four action alternatives is confounded by the fact that each action alternative identifies a distinctly different number of 'vistas considered for initial clearing'. We can discern no rationale for arrival at any of these numbers, nor can we discern that any given number has*

*any bearing on the environmental impact of the alternative. Comparison of the action alternatives would have been facilitated if the same number of vistas were proposed for all action alternatives, letting the analysis focus on more substantive issues. (Failure to present alternatives which have been constructed in a rational way is a problem common to most Yosemite planning processes.)..."*

(Conservation Organization; Correspondence #34)

**Response:** All alternatives did begin with the same number of sites considered as inventoried and listed in Appendix E. The numbers stated for management for each alternative were derived from subtracting the number of sites that fell outside the stated boundaries of that alternative. For example, it is stated that low-valued vistas for Alternatives 2 and 3 were not be managed, which reduced the number from 181 to 104. In addition, Alternative 3 limited actions in specific ecosystems and further reduced the number from 104 to 93. It was determined a detailed explanation of this confused the summaries of the alternatives, but the resulting number helped clarify the differences between the alternatives.

## **Alternatives**

### **Concern 10: The NPS should adopt the No Action Alternative.**

*"I was appalled to know NPS wants to clear cut so many vistas (30) at one time. I do not like this plan to clear cut to open the views. I understand that you want the park to be impressive, however Yosemite is already very impressive...I hope you consider the No Action Alternative."*

(Individual; Correspondence #27)

**Response:** The No Action Alternative described in Chapter II was considered and evaluated. The Preferred Alternative was determined to have the most benefit for the least potential adverse effects.

### **Concern 11: The NPS should adopt the Preferred Alternative.**

*"... [We are] generally supportive of the preferred Alternative 3, which limits the number of vistas considered for initial clearing to 93..."*

(Conservation Organization; Correspondence #13)

*"...Safeguards described in this alternative [alternative 3]include protecting mature old growth trees, trees that afford stand alone scenic value, restrictions on clearing high value trees including Whitebark pine, Sugar pine, and California black oak, and limiting vista management to roadside and Valley sites in non wilderness areas...These are important elements of the plan..."*

(Conservation Organization; Correspondence #29)

*"...The reason that I picked Alternate three is that it is a more conservative way to go. I do not want Yosemite to become too manicured and start looking like a city park not a natural area."*

(Individual; Correspondence #35)

**Response:** The NPS has selected Alternative Three as the preferred alternative.

**Concern 12: The SVMP should use minimum intervention in vista management.**

*“Meadows and Trees First! Not Visitors! Tree removals for Scenic Views and Meadow restoration is critical. However, I have concerns about the ability, commitment, the chronic statements about shortage of funds and manpower in accomplishing meadow ‘restoration.’ Simply removing trees to expand Cooks Meadow involves tremendous future years in monitoring a meadow. I don't think Yosemite staff can do it. If the meadows could be restored to its former glory and huge benefits to plants and wildlife, then remove only those trees needed to do so. But I have no faith that quick fixes and excuses will not interfere... One cannot compare scenic views of former years with today. Because today the U.S. and world's forests have been greatly depleted. Today's new plants will never have the advantages of a lesser polluted world, we need more not less trees. Yosemite already [has] magnificent views and also of Yosemite Falls. To remove a tree to get a better view from this and that standpoint is irresponsible.”*

(Individual; Correspondence #18)

**Response:** The Organic Act that created the NPS dictates that a balance must be found between accommodating present and future generations of people, and preserving the natural and cultural environment and discussed in Chapter I. When implemented, the actions proposed in the SVMP, such as managing scenic vistas for visitor enjoyment and revegetating areas with appropriate native species, discussed in Chapter II, will comply with NPS mandates. Sites will be monitored and evaluated on a regular basis based on site prioritization as shown on page II-11. The results of this work will create a stable and sustainable environment, which may require less maintenance over time.

**Concern 13: The NPS should limit the number of visitors allowed at view sites.**

*“...Instead of the continual cycle of building to accommodate more sight-seers, why not tailor the number of viewers to existing view sites?”*

(Individual; Correspondence #5)

**Response:** This plan does not propose building any new vistas. Any new construction is outside the scope of this project and would require separate compliance and discussed in Chapter I “Actions or Alternatives Considered but Dismissed.” Limiting viewers to each site would address some sites being overused, but not address the more common issue of sites being overgrown and underutilized by visitors as discussed in Chapter I.

## **Cost of Implementation**

**Concern 14: The NPS should monitor the costs of SVMP project implementation.**

*“...The plan is too expensive for our times in a deficit.”*

(Individual; Correspondence #16)

*“...The trees and shrubs have never bothered me. However all the buildings that have gone up over the years are obstructing some views more than the trees. Keep the wonderful trees and spend the money more wisely...”*

(Individual; Correspondence #28)

*“...This is also an expensive plan!”*

(Individual; Correspondence #32)

**Response:** Cost for implementing and maintaining vistas will not require significant funding in addition to the overall operational budget for Yosemite National Park. Costs will be monitored on an annual basis and refined as necessary. Costs for initial management by contractors can vary greatly year to years depending on the general economy and demand.

## **Vegetation**

**Concern 15: The NPS should dispose of vegetation removed for vista management, using methods other than those adopted as part of a fuels reduction program.**

*“...If large trees are going to be taken out for vista management purposes, that is one thing. It is entirely something else if they are to be taken out as part of a fuels reduction program. Especially if they are to be converted to cash at the lumber mill...”*

(Conservation Organization; Correspondence #34)

**Response:** The plan list several alternative methods to disposal of biomass on pages II-9 and 10 and will consider any option that would minimize impacts and not require additional compliance at the time a vista is managed. One such method could be contractors that could then utilize the removed trees commercially to offset their costs and reduce cost to the NPS. In the rare instance any additional cash is generated, it would not benefit the NPS and be deposited to the general government fund.

**Concern 16: The NPS should consider the value of trees for visitor experience: shading, screening facilities, and the sense of privacy at each site.**

*“... [We urge] Park staff to not be overly rigid in the approach of managing vegetation based on the date that a scenic vista was established...What is important is NOT the date when a vista site was first being utilized officially by Park management, but instead, what is important is whether that vista point today has beneficial value for visitors to the Park and will enrich their Park experience...”*

(Conservation Organization; Correspondence #13)

*“... [We encourage] Park staff to consider the value that individual trees may provide to the visitor at each site -- including provision of shade, screening of roads and buildings, and the perception of privacy in a natural setting...It is also important that balance is achieved to enhance and direct visitor use to established viewing areas, while keeping in mind the values that are preserved by retaining some of the vegetation that post date the establishment of the particular vista*

*point...*”

(Conservation Organization; Correspondence #13)

**Response:** The purpose of the plan is to reestablish vistas of particular icons and scenic resources for visitors, and is not seeking to historically reconstruct vistas as they once existed. Appendix A establishes procedures for reestablishing a vista by first focusing on the dominate focal point.

**Concern 17: The NPS should incorporate the SVMP proposed actions and alternatives into a forest management plan.**

*“...This plan should be incorporated into a more expansive ‘forest management plan’. Had forest been managed in a more ‘natural’ fashion in the past, this management plan may not have been needed...”*

(Individual; Correspondence #32)

**Response:** The plan does document that a major reason for the loss of many vistas, particularly in the lower montane forests, is that fire suppression has been a significant issue that has lead to encroachment of conifers. This is discussed in greater detail in Chapter I. Establishing healthy forests and other ecosystems is a primary focus for the Fire Management Plan and the Vegetation Management Plan. It is likely that if the NPS were able to manage forests as thoroughly as preferred in these plans, there would still be a need to do some vista management, but it would likely be significantly reduced.

**Concern 18: The NPS should keep an idealized landscape free from structures in the distant view.**

*“...The sketch of Washburn Point demonstrated how retention of trees can enhance a view. Hopefully, this example will be a standard for vista clearing throughout the park and that a repeat of the Tunnel View will be prevented. I am also concerned about keeping an idealized landscape where there would be vistas that are free of buildings and structures in the distance view. While the Ahwahnee adds to viewing pleasure, there are structures in the park that need to remain hidden...”*

(Individual; Correspondence #35)

**Response:** Guidance in the plan calls for natural appearance of vistas and this would exclude removing all trees in a vista. Trees within a vista, as illustrated on page II-6 of the EA, can enhance the view. This is reinforced in Appendix A in the description of procedures in counting potential trees for management. Screening of existing infrastructure is stated as a vista management goal, and it is inferred that trees that are not blocking vistas, would remain. Vegetation could be planted at locations to screen sites where no removals take place.

**Concern 19: The NPS should remove biomass from vista clearing to an offsite location, to reduce fuels and unnatural woody material.**

*“...[We note] that for ‘ecosystem’ benefits in many areas of the Valley Park staff have intentionally left trees that have been killed by prescribed burns or have left*

*large broken oaks or conifers that have been damaged by snow-loads, winds, etc. In truth, most of those trees would not even have been growing in the Valley if it were not for unnatural human intervention that halted natural wildfires and managed the Valley in a fashion that allowed large numbers of trees to take over the landscape. Thus, when many of those trees are killed or broken by either prescribed burning or natural events, the accumulation of that woody material across the roadside areas or within many forest stands is NOT a natural condition that would have been present if natural ecological processes had not been suppressed...*

(Conservation Organization; Correspondence #13)

**Response:** The SVMP proposes several alternatives to removing biomass at vista sites on pages II-9 and 10. The goals of the FMP to reduce fuel loads in certain ecosystems will be adhered to as practicable as described in Chapter I “Park Planning Context.”

**Concern 20: The NPS should retain hardwoods (i.e. oaks), deciduous, and old growth trees that contribute to the scenic value of the landscape, when managing vistas.**

*“...Although the plan states that no old growth trees will be removed in the preferred alternative, Table 11-5 shows that in all alternatives, trees over 30 inches DBH would be removed at the example vista site provided. It should be emphasized that such large trees do not necessarily need to be removed unless critical to the treatment objectives for that specific vista... Additionally, our Center urges that mature oaks and other hardwoods be favored for retention when trees are being removed for scenic reasons. Such deciduous trees do not have foliage for half the year, so their blockage of views is already naturally limited, and the fall season leaf colors of oaks, dogwoods, maples, and other colorful deciduous trees often add significantly to the scenic value of the landscape view...”*

(Conservation Organization; Correspondence #13)

*“... [We strongly recommend] that old growth trees be retained at scenic vista points. Old growth trees (generally those trees with a DBH of at least 30" or greater) should only be removed for scenic vista purposes if the Park provides a strong rationale for removal of that specific large tree, since those large conifers are providing a scenic, as well as biological benefit. As members of the public noted during the Park's tour of vista points, the view of Half Dome or Yosemite Falls is actually enhanced with the presence of surrounding vegetation, particularly large trees. More importantly, such trees provide valuable habitat in an area that has been largely modified to accommodate human visitors. Retention of trees that provide a variety of niches and nesting areas for many wildlife species should be retained to the greatest extent feasible...”*

(Conservation Organization; Correspondence #13)

**Response:** Viewing area and feathering widths are given in Table II-2 and are clearly labeled as “Maximum Width.” Reestablishing a vista to the maximum width is not necessary in most cases. The preferred alternative, described in Chapter II, gives consideration to certain species of high value in particular ecosystems, such as the



California black oak. Under “Actions Common to All Action Alternatives” in Chapter II, no old growth trees would be removed under this plan. This plan adheres to the definition of old growth forests as described by the U.S. Forest Service, Region 5 Pacific Southwest.<sup>1</sup>

**Concern 21: The NPS should consider existing views accessible to the public, prior to reestablishing other vista points.**

*“...As noted above, the goal should not be so much what it looked like when it was first a vista site. The goal should be to provide a great vista view for current Park visitors if it is an appropriate and important site for such a vista. And tied to that, if today's visitor to the Park can simply walk across the road or drive another 200 yards to another location to get the desired view, then it should not be a priority for Park staff to treat this specific vista site where the view may be blocked or diminished. Let the Park visitor walk or drive a short distance to an already existing vista point with an existing view...”*

(Conservation Organization; Correspondence #13)

**Response:** The Visual Resource Assessment (VRA) in the preferred alternative (Alternative Three) reduces the VRA score if similar views exist within one mile of sites under considered for vista management. If two sites offer similar views and have the same VRA score, the site requiring less maintenance would be prioritized for maintenance. The scoring process is described in detail in Appendix A. This site selection method is fiscally responsible and limits localized impacts.

**Concern 22: The NPS should remove a minimum amount of vegetation, with the goal of maintaining scenic vistas and enhancing the visitor experience.**

*“...Where a vista is determined by Park staff to be highly desirable, we urge the Park to focus on that objective, rather than trying to recreate what the scene may have looked like exactly as it was before. It is the scenic view today that should matter, not how to replicate or recreate the vista site as it was some time in the distant past...”*

(Conservation Organization ; Correspondence #13)

*“...At many, if not most sites, treating a 30-meter wide viewing area with adjacent 30-meter feathering areas on either side may not be either necessary or beneficial for a visitor experience. Accordingly, [we urge] that in the final decision for this plan, that there be clarity that the 30-meter wide core viewing area is a general maximum limit that would be applied as a standard approach to each vista; however, the Park staff should be tasked with the responsibility to determine where a narrower treatment swath or even where a slightly wider treatment swath is most appropriate at a specific vista site location...”*

(Individual; Correspondence #13)

---

<sup>1</sup> U.S. Forest Service, Department of Agriculture. (1992). *Old growth definitions/characteristics for eleven forest cover types*. [Internal Memo]. Retrieved from <http://www.fs.fed.us/r5/rs1/publications/oldgrowth/old-growth-define.pdf>

**Response:** The viewing area, described on page II-4, is the area from which the visitors enjoy the view. The size of the viewing platform does not always match the size of the current viewing area. For example, a constructed viewing platform may be 100 meters wide, but the vista opening through the vegetation may be only 10 meters wide. In this case, the viewing area would be 10 meters. While the viewing area width defines vista clearing boundaries directly in front of the viewing area, in some cases the clearing width can expand away from the viewing area to encompass a wider object. The feathering width for static views would be limited to no more than the width of the viewing area on each side of the view and the process is described in Appendix A. No old growth trees would be removed under this plan. Under “Actions Common to All Action Alternatives” in Chapter II, this plan adheres to the definition of old growth forests as described by the U.S. Forest Service, Region 5 Pacific Southwest.<sup>2</sup>

**Concern 23: The NPS should leave the trees alone.**

*“I've enclosed some letters my class have written about the plan. I read them the plan to inform them what's going on. I have been teaching for 30 years. I teach my students to RESPECT and care for Yosemite when they visit. This plan is against everything I teach them. Please take in mind what future generation WANTS TOO! Student's letters and drawings are included in the administrative record. Common substantive message is, “Please don't cut down trees.”*  
(Elementary School; Correspondence #39)

**Response:** All vista clearing actions would be intended to leave a vista that does not appear out of place with the surrounding natural environment. Trees and shrubs could be cleared to the target densities and vegetation community composition specified under each alternative, and detailed in Appendix B, H and I, retaining trees and shrubs as specified in annual work plans, an example of which is as shown in Appendix G. The maximum size for viewing areas and the maximum limits of feathering (selected clearing to blend the site with the natural environment) are specified in Chapter II. When possible, work crews would trim back (rather than remove) shrubs or trees to expose views as described in Appendix A. Vista clearing actions would adhere to the mitigation measures developed to protect natural and cultural resources, described in Chapter II.

## **Wildlife**

**Concern 24: The NPS should consider the effects of the SVMP on wildlife.**

*“...Yosemite already had magnificent views and also of Yosemite Falls. To remove a tree to get a better view from this and that standpoint is irresponsible. You'd be displacing all that depends on that one tree...”*  
(Individual; Correspondence #18)

---

<sup>2</sup> U.S. Forest Service, Department of Agriculture. (1992). *Old growth definitions/characteristics for eleven forest cover types*. [Internal Memo]. Retrieved from <http://www.fs.fed.us/r5/rs1/publications/oldgrowth/old-growth-define.pdf>

*“If they start cutting down trees, all the animal wildlife will be affected. The animals rely on shade, shelter, and homes from the trees...”*

(Individual; Correspondence #38)

**Response:** The NPS believes that under the Preferred Alternative, adequate measures are in place to protect sensitive plants, wildlife and the environment and described in detail in Chapter II. These measures are not defined under the No Action Alternative, but vista management would likely continue as before.

## **Scenic Resources**

### **Concern 25: The NPS should provide more turnouts to improve access to the vistas.**

*“...On page III-132 the plan states, ‘These studies demonstrate the importance of scenic driving and suggest that roadways and vehicles are an integral means of experiencing a park, in addition to providing transport. For example, Hallo and Manning (2009) found that automobiles provided visitors with opportunities to view scenery, explore the park, and experience the park with others in Acadia National Park. A similar study conducted in Yosemite National Park found that automobiles provide visitors the freedom to determine their own travel schedule to see what they want, when they want (White and Aquino 2008.)’*

*...However, in Yosemite, many of the areas that you could formerly pull off your car, so you can safely take in the view, have been removed. And, the ones that have been retained have been curbed and paved which makes the area more restrictive to parking. While this plan will open more vistas to view, no where in the plan has it been mentioned that viewing areas where you can park your car will be replaced or added...”*

(Individual; Correspondence #35)

**Response:** The plan considered but dismissed any improvements to infrastructure as part of the vista plan. It was determined to be of secondary importance to reestablishing vistas, and would require significant additional resources and impacts analyses if addressed at all vista sites. Additional compliance will be required to make any such improvements or repairs. This is stated on page II-16.

### **Concern 26: The NPS should consider vista management from a photographic perspective.**

*“...While I am greatly pleased with the expanded wheelchair access at glacier point (my husband is in a wheelchair) and the improved parking situation at the tunnel, I am not please by the removal of the trees. As any photographer knows, you need FOREGROUND to get good photos of scenery. By removing all of the trees that ‘block the view,’ you are also removing the only available foreground for those of us who enjoy getting creative with our photographs...”*

(Individual; Correspondence #7)

*“...In my opinion, the rehabilitation project at the Tunnel View Overlook has made this area lose its rustic character and natural look. The plan did not take*

*into consideration that photographers used certain trees to frame the view of the valley and those trees were removed. While there is more viewing area for visitors, removal of those trees has changed the character of the vista and made it look too bare. Retention of those trees would not have had a huge effect on expanding the viewing area...”*

(Individual; Correspondence #35)

**Response:** Guidance in the plan calls for natural appearance of vistas and this would exclude removing all trees in a vista. Trees within a vista, as illustrated on page II-6, can enhance the view. This is reinforced in Appendix A in the description of procedures in counting potential trees for management. Screening of existing infrastructure is stated as a goal for scenic view management, it is inferred that trees would not be removed if they are not blocking a vista, if it would then require replanting. Vegetation could be planted at locations to screen sites where no removals take place as stated on page II-10.

**Concern 27: The SVMP should trim rather than cut trees.**

*“...I think its fine to cut down a few trees, but you guys have taken it too far! Why can't you guys just cut the branch in the way?! I think not cutting a branch in the way because it doesn't look natural is ridiculous!!!!!!...”*

(Individual; Correspondence #25)

**Response:** When possible, work crews would trim back (rather than remove) shrubs or trees to expose views and described in Appendix A. Vista clearing actions would adhere to the mitigation measures developed to protect natural and cultural resources. Proposed vista clearing actions in the SVMP are intended to manage scenic vistas for visitor enjoyment, while maintaining its integral position within the surrounding natural environment. Surrounding trees and shrubs will be retained using *feathering*, a technique that uses selective clearing to blend the site with the surrounding vegetation and natural environs. The maximum width for viewing areas and the maximum limits of feathering are specified in the environmental assessment. The actions and intent and discussed further in Chapter II. Trees and shrubs would be cleared to the target densities, and the vegetation community composition as specified in each alternative and detailed in Appendix B, H and I.

**Concern 28: The SVMP should include additional scenic vistas.**

*“...Dredge Mirror Lake and get it back to the way it use to be....a scenic icon of the Valley. Relocate the current piled up sand in the flood damaged campgrounds and riverbanks, a win-win idea. Now that is a real scenic restoration idea worthy of as much consideration as tree thinning for vistas and views...”*

(Individual; Correspondence #9)

*“...No longer can we experience Hetch Hetchy like poet and Sierra Clubber Harriet Monroe's 1909 visit... (Kolana Rock and Tueeulala Falls described.)Before Hetch Hetchy was dammed in the 1920s, proponents of the dam argued that visitors would flock to enjoy the beautiful lake. But the reservoir must be drawn down most of the time to supply water and flood control capacity, and*

*the banks are hardly inviting...visitors can still experience Wapama [Falls]I the valley's gargantuan cascade...from the dam site (Image 1)...[and]from along the White Wolf-Pate Valley trail (Image 2)...[and]...from the base of the falls (Image 3). BUT the long ago actions of the City of San Francisco and the continuing scenic subservience of the National Park Service have rendered it virtually impossible for a first time visitor to be mesmerized by the most striking North Wall panorama...The NPS ...should...seek to restore the lost vista[s] for our visitors..."*

(Business; Correspondence #12)

*"... This is in regards to the first vista of Vernal Falls on the Mist trail, which is provided at the bridge over the Merced River on the early part of the trail. If this vista is not at this time being considered for upgrading, I urge you to check it out..."*

(Individual; Correspondence #1)

**Response:** The purpose of the SVMP is to develop a systematic plan to protect and restore Yosemite's important viewpoints, vistas, and the natural processes that created them. This plan will guide management actions by the National Park Service to determine the appropriate number, type, and location of scenic vistas. The programmatic approach described on page II-5 states that new sites would be evaluated if suggested, and considered for treatment. Some of the suggested sites have been evaluated, and listed in Appendix E, and may be identified for management in future annual plans, which will be available for public review.

## **Cultural Resources**

### **Concern 29: The NPS should address American Indian history in planning documents.**

*"...In your presentation for the Scenic Vista Management Plan Environmental Assessment Review it states 'This occurred for a number of reasons including the exclusion of traditional American Indian-managed fires, suppression of lightning-ignited fire, and human-constructed changes to hydrologic flows...It was the Paiute Yosemite Valley Indians, the Ahwahneechees, led by Chief Tenaya that did the 'Indian' burns to manage the Yosemite Valley floor not the Miwoks... The original name of the burn was called 'the Piute Burn' and that is documented by the National Department of Forestry in the 1940s. One of the main reasons the Ahwahneechee Paiutes burned the brush back was to have a clear view of approaching enemies and that was the Southern Sierra Miwoks. The Yosemite National Park service should correct the misinformation that they are falsely promoting to the general public..."*

(Individual; Correspondence #19)

**Response:** This plan focuses on the general concept that American Indians burned Yosemite Valley and other areas nearly every year, on the effects of those fires and on the visual impacts of discontinuing those fires. In that context the details regarding which

tribe or group conducted the burning is less critical. This plan does not address details concerning which tribe or tribal groups were present at specific times or places, or details of their practices. Park management has announced the intent to review the history of American Indians in the park to ensure that the park is presenting correct information.

## **Out of Scope Comments**

Some comments were expressed that were not within the scope of this project; therefore, they are not cited in this report. All comments were considered by planning staff, and will be forwarded to appropriate park office for review. Out of Scope topics included:

- alternative transportation issues;
- public comment methods;
- requests for additional campgrounds; and
- proposed actions related to other park planning efforts.

All correspondence is available for review on the Yosemite National Park website, SVMP project page at: <http://www.nps.gov/yose/parkmgmt/sv-info.htm>.