To: yose superintendent@nps.gov, chip jenkins@nps.gov From: George Whitmore <geowhit@qnis.net> Subject: tale of a bear Cc: Bcc:

Dear Dave and Chip--

I had a great experience in the Valley last Thursday, the highlight of which occurred as I was cruising along the road from Pohono Bridge to Bridalveil, headed back to Fresno. A "Siamese" bear (you know, brown ears and feet, honey colored body) ambled down off the cut bank onto the road, starting slightly as he noticed the car, and hustled off into the woods on the downhill side. Traffic was very light, and I was able to stop on the roadside and look for him.

By golly, there he was, oblivious to me, TEARING INTO A LOG IN SEARCH OF GRUBS AND SUCH! Can you believe it? A REAL bear making an honest living in broad daylight instead of skulking around in the middle of the night looking for cars or garbage cans to rip off! Congratulations on having trained the bears so well (at least some of them).

Incidentally, it occurred to me as I drove on that if I had been on a bus I never would have seen the bear, and I certainly wouldn't have been able to pause on the roadside to observe him tearing into the log.

I would hope the Park Service recognizes the value of an experience such as the one I had, but the present planning process leaves me wondering.

Hope all is going well with you. Regards, George Whitmore.

To: Brenda, Ananda, Heather, Joe Ruff, kathleen, Marsh Pitman, Ron Mackie, sylvia, iones@thegrid.net From: George Whitmore <geowhit@qnis.net> Subject: U.C. Merced Cons. Comm 7 June Cc: Bcc: Adopted by Tehipite Chapter Conservation Committee 7 June. The material in parenthesis was added by the Merced Group.> "We have a better chance of saving vernal pools and other habitat, as well as dealing with the threat of urban sprawl (with resulting loss of prime agricultural land), if a REGIONAL approach is used in planning for (all of) eastern Merced County. "The high visibility and money that U.C. can bring to the process is much more likely to achieve this ((the protection of resources (habitats, vernal pools, farmland, air, water, etc)) than letting development occur in the usual piecemeal manner. "We welcome the intense interest in this process from throughout the state because it helps ensure that the process will work the way it should (which means following the applicable laws and regulations (with public involvement)).

To: yose planning@nps.gov
From: George Whitmore <geowhit@qnis.net>
Subject: Sierra Club comments, Valley Plan, Part 1 of 3
Cc:
Bcc:

Reply to P.O. Box 5572, Fresno, CA 93755

COMMENTS OF THE SIERRA CLUB ON THE DRAFT YOSEMITE VALLEY PLAN Part 1 of 3

This message constitutes the final, official statement for the record of the Sierra Club on the draft plan for Yosemite Valley prepared by the National Park Service and released to the public in early April 2000. While various people associated with the Sierra Club spoke at recent hearings on this subject, this statement should be regarded as the final, full text of the Club's position.

INTRODUCTION

The Sierra Club appreciates the work and effort that has gone into the process of preparing the five volumes of this draft plan for Yosemite Valley. Many important questions have been raised, and much useful data has been assembled. And the Club appreciates that further detailed planning needs to be done to realize the goals of the 1980 General Management Plan.

However, the Sierra Club cannot support any of the alternatives proposed in this draft for the future management of Yosemite Valley. The range of alternatives does not offer one that would be clearly preferable from an environmental point of view. In all of the alternatives presented, there are elements that the Club both supports and does not support. The alternatives do not offer enough choice, and include forced combinations of elements. In many respects, the alternatives focus on moving development around the Valley, as well as proposing various transportation options.

Moreover, the release of this draft is premature. Under the Wild and Scenic Rivers Act, a final, valid plan for the Merced River is supposed to guide further development choices in the Valley. This draft has been prepared in the absence of the guidance that such a plan should provide. While this draft Valley plan can still be revised, this hurried process makes it impossible for the public to see how the Park Service proposes to integrate the two plans, with the Merced River Plan providing the leading guidance. The public, thus, is deprived of the opportunity, before final decisions are made, to offer comments on the approach taken to integrate them.

For the Sierra Club, these questions of timing are all the more important because of its belief that the draft plan for the Merced River was inadequate in many respects, most fundamentally in its failure to be grounded in scientifically adequate studies (such as of ecology and hydrology) and to provide a plan geared to management of Outstanding River Values. Such a plan would have much to say about the sizing, location and appropriateness of facilities in the Valley. We find it difficult to comment on proposals for altering the size and location of facilities without reference to the kind of river plan required to be in place before these proposals are made. A valid comprehensive plan for the Merced River needs to be completed first before a plan for Yosemite Valley. Absent the completion of a valid river plan which protects and enhances the values of the Merced River, this draft Valley Plan should be rescinded. After completion of a valid, protective river plan, a Valley Plan based on it should be drafted.

GENERAL OBSERVATIONS

The Sierra Club believes that the goals set forth in the 1980 General Management

Plan for Yosemite National Park should guide planning within Yosemite Valley (together with a final valid plan for the Merced River under the WSRA). Planning should ensure that natural processes prevail, reclaim natural beauty, reduce crowding and traffic congestion, and promote conditions that will better enable visitors to understand and enjoy the park's intrinsic natural values. Experience in the ensuing years, as well as changing conditions, suggests the need for guidelines to indicate how these goals may be best achieved. These are the ones that the Sierra Club believes would help shape an appropriate plan for Yosemite Valley.

One. CONTAIN DEVELOPMENT

There should be no further degradation of the environment of Yosemite Valley. Too many areas have been impacted over the years through shifting ideas of how to accommodate visitors. Valley habitat at that elevation is especially valuable (more than realized earlier). Thus, no new sites should be developed or impacted. No new development should take place. This is the equivalent to the admonition to doctors to "do no harm" in seeking remedies.

Two. REDUCE IMPACTS

Development now occupies too much space in Yosemite Valley, thus preempting valuable habitat. Much of the development there is not essential. To restore habitat and to better allow natural processes to prevail, the total space occupied by development (i.e., its footprint) should be reduced steadily over time.

Three. ESTABLISH LIMITS

As an exceedingly popular park, Yosemite Valley is now drawing too many pressures that place stress upon its environment (i.e., "stressors"), particularly at periods of peak visitation. These stressors need to be identified and their impact measured. They should first be capped whenever they are preventing realization of the GMP goals, and then plans must be laid to reduce them to levels that are no longer problematic. These stressors include vehicles, emissions, roads, parking places, facilities, and visitors.

Four. PRIORITIZE RESTORATION GOALS

In pursuing goals for restoration, clearer priorities need to be established. Analysis should indicate which types of habitat most need restoration and for which species, taking into account rarity, trends, threats and prospects for success in overcoming fragmentation. A proper plan for the Merced River would provide much of this analysis and should be in place before any plan for the Valley is drawn up or presented.

Five. ACCOMMODATE VISITORS RESPONSIBLY

Accommodations for visitors impose varied levels of stress upon the Valley's environment. Lodges with large footprints and heavy service requirements impose long-term burdens on the Valley's environment. For that reason, day-users are preferable to overnight visitors, even though they may generate more of a temporary traffic burden. Sources outside the park are abundant for providing overnight accommodations.

For those who do stay overnight within the Valley, campgrounds should be preferred in contrast to lodges. While they occupy more space, they do so with less impact and longevity. And walk-in sites in campgrounds should be preferred to drive-in sites because they have even less of an impact.

No new or additional hard sided visitor lodging units beyond what currently exists should be built at Yosemite Lodge, Curry, or Housekeeping

or anywhere else in Yosemite Valley. We ask for restoration of the numbers of pre-flood camping units which the Park Service removed without any public input or plan. We ask for retention of most of the visitor tent cabins at Curry and for most of the Housekeeping units, except those in close proximity to the river.

Six. VISITORS' EXPERIENCE: MAINTAIN ITS QUALITY

In addressing various problems, it is important to seek to maintain the quality of the visitor's experience. Visitors relate to Yosemite's features in different ways and seek different experiences based on the intrinsic natural values of Yosemite. Within the natural constraints of Yosemite Valley, efforts should be made to allow visitors the freedom to seek their own preferred types of experience, particularly at seasons when stresses on the environment are not great. Visitors should not all be forced into a single mold.

SPECIFIC COMMENTS

RESTORATION

There is too much emphasis in the various alternatives in the draft plan on moving facilities from one place to another and on constructing new facilities in places unimpacted in the past. Emphasis should be placed on restoration under a clearly articulated set of priorities. Progress toward restoration should be gauged in terms of changes of the same character (e.g., campgrounds added and removed, pavement added and removed, and buildings added and removed).

Continued efforts must be made to remove buildings for non-essential businesses and functions, particularly those that can be relocated outside the Park in existing developed areas. Many are listed in various alternatives in the draft. As more visitors become day users, they will look to gateway communities to meet their various needs, rather than expecting to find them in Yosemite Valley.

Various other developments that prevent natural processes from operating should also be removed. These include rip rap along the banks of the Merced River, road embankments that invade its waterway, and bridges that constrict the flow of the river at periods of peak flow (they should be replaced). The Cascades Dam should be removed in an environmentally responsible way (one that is not linked to road reconstruction or widening of any intersection). The temporary parking lot constructed at Camp Six should be removed, and the area restored to its natural condition. Special attention should be given to removing facilities that are inconsistent with protection of Outstanding River Values and that would impinge inappropriately on sites that have High Value Resources.

If the goals of the 1980 GMP for restoration and the reduction of crowding and congestion are to be met, limits must be placed on the various activities that particularly stress the Park's environment. There must be limits on the number of cars and busses that are permitted to enter the Valley each day (which are critical at periods of peak use). Busses pose severe burdens, particularly large ones fueled by diesel engines. Large busses do not fit the design parameters of the existing road network; diesel fumes are a serious health threat (containing carcinogens). So there must be limits on the number of busses permitted to enter the Valley each day. And there must be limits on the number of parking spaces provided in the Valley for both cars and busses. And there must be limits on the number of people permitted to stay overnight in the Valley. Without such limits, the Valley will all too often be overwhelmed.

Limits may be set in various ways, such as by establishing carrying capacities or through establishing thresholds of decline (or "limits of acceptable change") or use of the VERP process. While these methodologies

may not always produce solid numbers, it is very clear that failure to establish any limits (even arbitrary ones) will lead to ever mounting problems and take us ever further from the 1980 GMP goals. The limits already present in that plan must not be ignored nor overridden.

There is already a built-in limit: the number of parking spaces. Do not override this limit. On the days when there are too many vehicles, and when the Park Service anticipates this might be the case, news advisories could be very useful to limit the numbers entering Yosemite and obviating the problem before it happens. Electronic signs can be set up along the way, and news advisories on the radio could be made effective for notifying people as they approach the Park.

To: yose planning@nps.gov
From: George Whitmore <geowhit@qnis.net>
Subject: Sierra Club comments, Valley Plan, Part 2 of 3
Cc:
Bcc:

Sierra Club, Part 2 of 3

VISITOR ACCOMMODATIONS

Because lodging for visitors outside the park has expanded dramatically in recent years, there is no need to expand accommodations at various sites in Yosemite Valley or elsewhere in Yosemite. Most of the alternatives would decrease the availability of inexpensive accommodations at Curry Village and elsewhere. These are the facilities within most peoples' budgets. Instead, a greater number of facilities at the high-cost end of the spectrum would be provided at Yosemite Lodge. This shift is unacceptable—in both places. High-end facilities encourage the misplaced notion that Yosemite

Valley should be viewed as a destination resort and encourage over-development.

The number of overnight units at Yosemite Lodge should not be expanded beyond the current existing units. Some alternatives call for almost 200 more units there. While the 1997 flood caused some units there to be abandoned, they

were located inappropriately in the flood plain. Over time, one or more additional buildings in that location should be removed, particularly as understandings of the boundary of the historic floodplain improve.

To the extent that already existing accommodations continue to be provided for visitors, they should be provided only in their current locations, such as at Curry Village. Emphasis should continue to be placed on maintaining units that

meet the needs of people with limited means such as the currently existing tent cabins at Curry and Housekeeping units. Facilities such as tent-cabins have a low impact, require less infrastructure and employees to maintain than do the proposed new lodging units, which we oppose, at Yosemite Lodge, Curry, and Housekeeping.

However, campgrounds provide the best way for serving such visitors because they have the least overall impact and cost even less. The number of spaces in campgrounds in Yosemite Valley should be returned to the levels available before the 1997 flood, though not necessarily in the same places (sensitive habitat should be avoided). With the removal by the Park Service of 40 per cent of the campground space in that flood, camp sites are now in short supply. The

number of spaces should be returned to the range of 600-800 sites. However, the emphasis in their design should be on walk-in campgrounds that have even less impact. At least one-third of the sites should be for walk-in visitors.

As visitors come to rely on lodging outside of the park, most visitors will then become day users. By requiring less infrastructure, they have less long-term impact on the Valley's environment than overnight users. Limits on parking and bus numbers should keep them from overwhelming the Valley at peak times. A system of radio notification and electronic signs would help alert visitors prior to arriving in Yosemite.

VISITOR EXPERIENCE

Planning for use of the Valley should bear in mind that visitors do not all seek the same experience. Some plan to stay a while, while others visit it for only an afternoon. Some will focus their attention on prepared attractions:

the visitor center, viewpoints, lodge facilities, and ranger talks. Others will want to see nature close up on trails, on the river, or through climbing. Some may be content to look out the windows of tour busses, while others will want to pull over to stop, wander and explore. Some may begin in one mode and evolve

While planning does need to protect the park from overuse and congestion, it should not force everyone into a single mold, particularly during off seasons. For instance, places to pull off the road should not be eliminated so as to prevent spontaneous exploration. Not everyone will want to come and go on busses, nor in every season. If the GMP goal of promoting visitor understanding and enjoyment is to be realized, more self-reliant, exploratory modes of experiencing the Valley should be facilitated, not eliminated as this plan would do. In this way, the quality of the experience can grow.

TRANSPORTATION

into others that are more self-reliant.

Planning for transportation to the Valley, and within it, should take into account the total burden on the environment of a transportation mode in all places and at all times. Impacts of plans need to be weighed in various places: in the Valley, elsewhere in the Park and outside of it, as well as considering impacts that are short-term and longer term. It is counter-productive to seek to alleviate short-term problems by creating long-term, adverse impacts. Seasonal congestion should not be alleviated through sacrificing important habitat or river values (ORVs), nor should levels of carcinogens be increased (as from diesel engines in busses).

Care must be taken to set priorities among goals for environmental improvement in transportation planning.

Protecting habitat is more important than relieving seasonal congestion.

Reducing levels of air pollution is more important than minimizing driving time. To meet the 1980 GMP goals for restoration, the amount of pavement in the Valley must not spread and expand; road standards must not be raised so as to jeopardize habitat (to facilitate larger vehicles).

As mentioned earlier, limits must be set on the number of cars and busses that are permitted to enter the Valley each day. There must also be limits on the number of parking spaces provided for these vehicles. In determining the number of parking spaces for planning purposes, pull outs along roads should not be counted as regular spaces (but all other spaces should be counted, including those for day users, overnight visitors, spaces for staff of the Park Service and concessionaires, for service vehicles and bays for busses. Employees working in Yosemite Valley, including planners and administrators, should be accommodated with van service. No employee should drive into Yosemite except under special need circumstances.

Do not exacerbate congestion by continuing to remove parking. Stop taking out the parking turn out areas used by visitors to enjoy Yosemite's natural values and spontaneous experiences——sunrises, sunsets, rainbows, moon rises, animal sightings, swims in the river, photo opportunities, bird watching, sketching, etc. Remove the intrusive, unnecessary, and dangerous boulders which have recently been placed by the road to block these types of experiences.

Areas already impacted should be used for parking. Day-use parking should be provided principally in the Yosemite Village area and secondarily in the orchard area near Curry Village. More space for parking in the Yosemite Village area can be obtained by removing unessential buildings there, such as the garage and concession headquarters. Space thereby made available there that could be used for parking should not be devoted to constructing a new visitor center; the current location should continue to be utilized instead. Overnight visitors should be able to park near their places of lodging or camp sites.

However, Camp Six should not continue to be used for parking. It is

a Highly Valued Resource area, is in the flood plain, and should be protected in a proper Merced River Plan. It was developed suddenly without notice nor full assessment of its environmental impacts under NEPA. It should be restored to its natural condition. Parking removed by the Park Service from the Curry orchard should be restored to Curry and removed from Camp Six. Camp Six should be restored to a natural condition.

No new parking and transit facilities should be constructed at Taft Toe. While a transfer point there would keep long-distance busses out of the east Valley, development of that site would impose unacceptable impacts on an undisturbed site (on 169 acres) that is part of the scenic foreground and is within the rockfall zone (i.e., the so-called "shadow line"). This would be a clear cut of a woodland in Yosemite National Park and is totally unacceptable.

Some of the alternatives contemplate having hundreds of additional busses (231-385) arrive daily during the peak season. These busses are likely to be noisy, over-sized, and pollute badly (because they will be fueled by diesel to make the grades up into the Valley). Moreover, use of such busses in increasing numbers will increase pressures to widen roads and expand turning radiuses, which will sacrifice habitat. The number of such busses permitted to come into the Valley must be strictly limited, or conditions will worsen (especially toxics in the air). There should be no increase in the number of such over-sized or polluting busses.

Busses should be of a modest size that fit the existing road system and are less intrusive. Ones must also be sought that are cleaner, such as ones fueled by compressed natural gas. Until these smaller and cleaner busses are in service and dirty, over-sized ones are disallowed, and until limits are imposed on the number of vehicles (busses and cars) that can enter the Valley each day, a major shift to busses is not advisable. Busses of the wrong kind unleash too many adverse pressures. Thus, it is premature to undertake the development of satellite parking lots.

Parking should be restored to the Curry orchard, and also concentrated in the Yosemite Village area. Removal of the concessionaire headquarters and the maintenance garages would free up areas acceptable for parking. Much of the congestion could be reduced by simple, inexpensive means. The lack of good directional signs has been a chronic problem for years, both for cars and for pedestrians. Signs indicating distance (miles, kilometers, yards, feet, etc.) would show the visitor how close he is to where he wants to be, and would encourage walking. Better information at the entrance stations is needed, especially a detailed map of the east end of the Valley. Moreover, as more visitors seek lodging in gateway communities, private lodges can provide small shuttle busses to bring visitors in and out each day. As that happens and the transition to better busses takes place, what kind of remote parking facilities are needed, if any, may become more clear.

The Park Service should give greater priority to developing a traffic management plan for Yosemite Valley. There need to be more logical patterns of traffic flow, and better signs are needed to guide drivers to their destination. At peak-use times, officers should direct traffic at crowded points. This will help appreciably in reducing confusion and congestion.

The proposal to close Northside Drive should not go forward. It does not gain any restoration of habitat (since the pavement would not be removed). And by shifting more traffic to Southside Drive, habitat would be lost as trees would be removed to widen the road to accommodate increased traffic loads and add lanes. Furthermore, habitat would be lost through the proposal to relocate part of Northside Drive south of Yosemite Lodge on the floodplain, which we also oppose. Instead, it should be kept on its current alignment. Moreover, there would be no need to construct a second bridge over Yosemite Creek.

Moreover, further damage to the Park should not be done through widening the El Portal Road from the junction of Highways 120 and 140 to Pohono Bridge (Segment D). No environmental impact statement has been prepared on the effects of reconstructing that segment. The ecological damage already done through widening the more westerly portions of the El Portal Road should be reversed through a process of restoration (including the construction staging areas).

CONCLUSION

In conclusion, the Sierra Club seeks a plan for managing Yosemite Valley that builds on the foundation of a valid river plan and is keyed to reducing impacts, restoring natural processes, and not impacting new areas. It cannot support plans that spread impacts and create new risks.

This draft should be withdrawn until a proper river plan is in place and then revised to better protect and restore the ecosystems of Yosemite Valley based on a protective river plan.

To: yose planning@nps.gov
From: George Whitmore <geowhit@qnis.net>
Subject: Sierra Club comments, Valley Plan, Part 3 of 3
Cc:
Bcc:

Sierra Club, Part 3 of 3

basic mission.

There are a few additional comments that did not find their way into Parts 1 or 2.

We support the continued existence of suitable facilities for the provision of medical services in Yosemite Valley. It is grossly unrealistic to expect the large numbers of people you are planning for to be without a fairly advanced level of emergency care, particularly in view of the somewhat hazardous nature of much of the visitor activity, and the isolated situation of Yosemite Valley.

It is conceivable that, at some point in the future, there could be a reduction in parking from current levels. But we don't need a continuation of the Park Service's long-term policy of creating chaos by eliminating parking without having any alternative plans in place. Further reduction in parking, if any, should be considered only after APPROPRIATE alternative transportation is in place, operational, has secured funding, and has proven to be successful.

The potential damage to the Park from this ill-considered plan is immense. Proposals of this magnitude need time to mature, to be modified, and to gain public acceptance. Instead we have the spectacle of the Secretary attempting to ram HIS ideas through for reasons best known to himself. The contrast between the process which produced the 1980 General Management Plan and this process couldn't be greater. That plan has stood the test of time. How long do you think this plan would hold up?

At the Secretary's direction, you are about to violate your own Organic Act on its two most basic counts:

- 1. You are required to protect the natural values unimpaired; this plan doesn't do it.
- 2. You are required to provide for the enjoyment of the visiting public; this plan would have quite the opposite effect.

Even if you are convinced that neither the Merced River Plan nor the Valley Plan can be stopped by a judge, one would think that common decency would compel you to withdraw this plan and start over again with adequate opportunity for public discussion. We see increasing evidence that many people are only just beginning to realize what this plan is all about, and they don't like it. But then public relations has never been one of the Park Service's strengths. It's too bad, because we agree with what is supposed to be your

Regards,
George W. Whitmore, Chair
Yosemite Committee
Sierra Club

Yos.Com. + Mike /Al, 09:17 PM 7/7/00 -, Yosemite Valley Plan Comments

To: Yos.Com. + Mike /Alan, George's List, Mike Paparian

From: George Whitmore <geowhit@qnis.net>
Subject: Yosemite Valley Plan Comments

Cc: Bcc:

Hello all--

The comments on the Valley Plan are finally sent off to the Park Service. I will transmit them to you all in three parts immediately following this (four messages total).

Mike McCloskey saved the day by writing the basic framework of Parts 1 and 2. Most of the words are his, although Joyce suggested a number of changes. I used most of her suggestions, although not all. I did a large amount of editing, some on Mike's words, some on Joyce's.

There was substantial input from some Committee members. To the extent that I have gone against the wishes of some, it was with the belief that I was reflecting a larger Sierra Club view. Of course this invariably results in everyone getting mad at the person in the middle, so you may be wanting a new Committee chair. Especially when you read Part 3; I take sole responsibility for that portion of the comments.

I greatly appreciate the thought and time that several Committee members devoted to the writing of these comments. Mary Anna McKinley has been exceptionally helpful, as has David Underwood. Vicky Hoover and Ron Mackie made lengthy comments. Sylvia, Marsh, Sam, and others also helped. But the actual words provided by Mike were invaluable, and Joyce helped get some ideas into words. Thank you all.

George.

(Actually the work on these comments has raised more issues than it has settled. The task of figuring out what is best for Yosemite goes on. Your ideas are always welcome.)

To:
From: George Whitmore <geowhit@qnis.net>
Subject:
Cc:
Bcc:

December 24, 2000

Mr. John Reynolds
Regional Director
Pacific West Area
National Park Service
600 Harrison Street
Suite 600
San Francisco, CA 94123-1308

SUBJECT: Final Yosemite Valley Plan

c/o yose planning@nps.gov
(e-mail transmission only)
(No hard copy has been mailed.)

Dear Director Reynolds:

while we recognize that the official time has passed for comments on the proposed plan for managing Yosemite Valley, we want to go on record to offer our reactions to the final Yosemite Valley Plan as released in November. Moreover, as you contemplate your final decision on the preferred plan that the Superintendent has proposed to you, we hope that you may find our comments useful.

At the outset, we do recognize that changes were made in the preferred alternative in response to comments that we and many others made. We are particularly pleased that the park recognizes that "restoration of highly valued natural resources is a priority, especially along the length of the Merced River." We are glad to see there is now essentially no net increase in number of accommodations at Yosemite Lodge. And we welcome the decision not to move forward with the idea of constructing a new parking facility at Taft Toe.

ASSUMPTIONS

However, we continue to question many of the assumptions that underlie this proposed plan.

Because too many sites have already been degraded, we do not believe it is wise to shift development to new areas (even if the overall footprint were to be reduced). The plan does not confine development to existing sites.

Moreover, the plan is far from clear in limiting the factors that impose stress upon the Valley's environment. These stressors include vehicles, emissions, roads, parking places, facilities, and visitors. While it would limit the space for automobiles, it would leave open growth in bus traffic, particularly tour and YARTS busses, and satellite parking in other areas of the Park. And after casting doubt on the validity of the existing GMP's visitor limit, it would look to a future VERP process to define new limits, which might, or might not, be more restrictive.

And the plan for restoration in the Valley is far from clear. The plan does not enable one to see what the aims are for each parcel to be restored, nor to what standards these areas would be restored, nor how fragmentation would be overcome. Furthermore, questions arise as to whether much of this restoration might go forward in any event, regardless of implementation of other parts of the plan.

Finally, we are disappointed that this plan was developed in such

haste, before it was clear that a legally compliant plan for the management of the Merced Wild and Scenic River was in place. The river plan, which should

stand as the foundation for all planning in the valley, is still under litigation. Questions still exist as to whether adequate planning has been done to identify, enhance and protect Outstandingly Remarkable Values (ORVs) for the river. And the Valley Plan seems to confound these ORV values with Highly Valued Resources, which seem to stand in their place. It is far from clear whether the Valley Plan will be revised if court decisions require revisions of the River Plan.

CHANGES FROM THE DRAFT

However, we do note changes, some of them for the better, that were made in developing a final preferred plan.

We are glad to see that, overall, twenty fewer lodging units are recommended, and the number at Yosemite Lodge would go down by 135 (though that would still constitute six more than are there now). And we welcome the effort to retain more low-cost units at Curry Village and Housekeeping. While we note that a slight increase was made in the number of camp sites (25 more), the total of 500 is still 300 short of what was in the Valley prior to the flood.

And we are pleased that the depiction of the River Protection Overlays on the plates shows them covering larger areas, including back channels and wetlands; however, it is the quarter mile boundary which must form the basis for river protection.

We also note, however, that some elements in the final preferred plan are less satisfactory. More bus trips would be expected each day during peak periods (285 instead of 231), while the saving in energy use would be less (37% instead of 52%).

And more employee beds would remain in the Valley (723 in contrast to 683).

VALUABLE GOALS

But we do recognize that the recommended plan would be designed to achieve some very important goals:

- --a reduction of nearly 300 overnight lodging units (with 164 to be removed from the flood plain);
- --a reduction of 554 employee beds in the Valley;
- --and a net gain of 71 acres that would be restored in the Valley (though we regret the loss of 75 acres of undeveloped land in the process.)

We applaud plans to remove unnecessary developments and facilities, including:

- -- the Cascades Diversion Dam;
- --rip rap along the banks of the Merced River and other development within the River Protection Overlay;
- -- the village garage;
- -- the concessionaire headquarters; and
- -- the tennis courts at the Ahwanhee Hotel.

PROBLEMS OF PARTICULAR CONCERN

But, nonetheless, we see some problems in the plan that still need to be addressed in a satisfactory manner.

(1) DIESEL BUSSES.

While we welcome the pledge to use "the best available fuel and propulsion system technology to minimize noise and air pollutant emissions,"

additional busses should not be added until satisfactory technology which will reduce air and noise pollution is in hand and will be used for existing and any new busses. We note in Table 4-31 (p. 4.2-123) that if diesel fuel is used that NOx emissions in 2015 would be worse with the shuttle bus system to remote sites than under the "No Change" alternative. NOx emssions would increase by 32%.

We cannot agree with any change that would increase, rather than decrease, emissions and produce worse air quality or move impacts to new or expanded areas. The discussion in the EIS of air quality is conspicuously silent on the question of whether air quality standards would be met with this increase in NOx emissions. Diesel fuels are also high in sulfur content. Both sulfates and NOx are precursors of ozone. Exceedances of air quality standards for ozone have occurred in recent years in Yosemite Valley. Moreover, diesel fuel emissions contain deadly carcinogens as well as dangerous small particulates, and few diesel engines are operated with any serious emission control systems. Unlike cars, which have gotten cleaner, diesel busses have not.

We continue to urge that busses bringing visitors into the valley need to use clean fuel technologies. Fuel cells or propane seem to be the most promising technologies along this line (see table 4-31). The door needs to be closed on the growing number of busses using dirty fuels, rather than be opened. We believe that you ought to impose a moratorium on the growing number of tour and YARTS busses, and their arrivals need to be scheduled at appropriate intervals.

And busses coming into the valley need to be less noisy. Some of them now produce noise at 16 times the natural sound level (for those standing within 50 feet). Moreover, the noise they produce can be heard within nearby wilderness areas of the park (on valley cliffs and on the rim).

Finally, such busses need to be smaller so that they fit within the design parameters of the existing road system. Otherwise, the growing number of such busses will exert constant pressures to build larger and larger roads, to the detriment of park values and visitor experience.

(2) UNCONTROLLED GROWTH.

As indicated earlier, the recommended plan fails to come to grips satisfactorily with the growth in the factors that stress the environment of Yosemite Valley. Limits are addressed only indirectly, with the question deferred for up to five years while the VERP process is pursued.

This is particularly so with respect to growth in bus traffic. Busses can bring far more visitors to the valley than can cars. Total visitation via car is more easily limited by congestion and limited parking space. But if busses displace cars, the potential number of visitors is far greater. They can suddenly produce crowds that overwhelm special places. And as their numbers increase, so also will the pressures for more accommodations, facilities, and infrastructure.

Once remote parking lots are built, it will be all too easy to expand them. New centers of development can all too easily sprawl out around these lots. Not enough research or planning has been done to determine whether sites can safely be developed at Hazel Green or Foresta. One rare plant and one plant of federal concern are found at Hazel Green, as well as habitat for the California Spotted Owl, which is endangered. Even Badger Pass is problematic because of its inadequate sewage system

We are quite concerned with construction of a bus depot with 16 bays being developed in the heart of Yosemite Valley. This does not fit in with the goal of reduction in impacts nor of increasing the quality of the visitor's experience of the natural values of Yosemite. The recommended plan assumes that the number of bus bays will de facto limit the number of busses arriving from out of the valley. But pressures will grow from tour companies and outside commercial lodge owners

to increase the number of such bus bays. Such bays might be taken from either the allocation for day use auto visitors, or from habitat.

Once again, we urge the National Park Service to establish a moratorium on granting permits for any more tour busses or YARTS busses, and to establish

limits on the number of busses entering the valley, as well as for automobiles. Under the proposed plan, at peak periods a bus would be expected to arrive at the visitor center every 1.3 minutes. Busses would be arriving practically in convoys.

These limits are the necessary counterparts of limits on overnight lodging units, camp sites, parking spots, and employee housing. All of these sources of pressure need to be controlled simultaneously to prevent pressures from transferring themselves from one point to another. Busses can be part of the solution, but unless their numbers are tightly controlled, they will also come to be the problem.

Work on satellite parking facilities should not go forward until limits have been established on bus traffic into Yosemite Valley, and even then only if siting problems have been resolved (in terms of limiting environmental impacts and containing sprawl at the sites).

(3) SOUTHSIDE DRIVE AND OTHER ROADS

We remain concerned about the plan to shift traffic entirely to Southside Drive. Closing Northside Drive to traffic will not produce any habitat gain, merely seasonal respite from noise. But it will result in habitat loss along Southside Drive as all traffic pressures focus on it. The EIS informs us that the park does intend to widen it, with "the extension of pavement over strips of habitat alongside the road" [p. 4.2-54]. We understand that the plan is to improve it to the same level as accomplished in rebuilding the El Portal road, which was so controversial. Moreover, if the proposed traffic check station is built at El Capitan crossover, then even more habitat will be lost.

Moreover, we do not agree with relocating Northside
Drive along the south side of Yosemite Lodge (closer
to the river), and building a new bridge across
Yosemite Creek. Again, this will produce a needless loss of habitat,
with little, if any, gain in the visitor experience.

We do not understand how this plan advances the restoration agenda. Very little is gained, while a lot is lost.

(4) SEGMENT D

We understand that attention will not be given to the issue of Segment D of the El Portal Road until the Cascades Diversion Dam has been removed, the river bed has stabilized, and until compliance with environmental laws has been pursued. (We ask that Cascade Dam be removed in an environmentally responsible manner, with appropriate scientific appraisals of the best manner in which to remove the dam completed first.)

We do want to observe that, while widening of Segment D is not necessary, there may be a desire by the Park Service to engage in roadbed stabilization, intersection

redesign, sewer repair, paving, or other types of construction activity. In such an event, compliance with environmental laws should be pursued in good faith, with an appraisal

of the potential impacts of various alternative designs helping to guide the Park Service to the least harmful alternative.

Because of obligations under the Wild and Scenic Rivers Act, that design should be aimed at keeping construction out of the bed and off the banks of that river. The EIS admits that stabilization materials are now in the river channel "and interfere with the free-flowing condition of the river" [table 4-39, p. 4,2-167].

We are troubled by the ambiguities of the plan with regard to whether good faith compliance will be attempted. Many comments are made that suggest no more than pro forma compliance and a definite intent to re-construct regardless of what is found. The EIS actually states that the non-conforming material will "remain in the river channel after the road is constructed" [table 4-39, p. 4.2-167]. The Park Service seems to assume that study, and notice of intent to obstruct a wild river's free-flowing condition under section 7, will meet the requirements of the Wild and Scenic Rivers Act. But we assert that additionally the administering agency has a positive duty to keep obstructions out of the bed of such rivers. We share hopes expressed in the plan that it will be found feasible "to design and construct the road in a manner that would avoid direct and adverse impacts on the values for which the river was designated" [p. 4.2-175]. We hope that deficiencies in legal compliance will not continue to shadow whatever additional work on this road may be proposed.

We note that all the above concerns would be vastly reduced if the Park Service would recognize that Segment D does not need to be widened. The combination of gradients and curves which were felt to be a problem on Segments A, B, and C do not exist on Segment D. The problem appears to be one of blind insistence on unform standards as an end in itself.

IN CONCLUSION,

It strikes us that the tasks ahead ought to be tackled in a certain order. At the outset, priority should be given to settling the court case regarding the Merced Wild and Scenic River plan and developing a legally compliant river plan since that provides the basis for so much else. Next, we urge that a process be initiated to promulgate a moratorium on issuing any more licenses for tour busses entering the valley, and any other busses which would create additional air, noise, sprawling impacts, or runoff pollution.

Then various relatively non-controversial tasks ought to be pursued: downsizing the level of accommodations in the valley, continuing to move non-essential facilities out, and increasing the pace of restoration work. At the same time, efforts should be made to clean up the emissions of existing busses that enter the valley through establishing a schedule for conversion to cleaner fuels. And upgrading and renovating the sewage system for the Valley would seem to be relatively non-controversial, especially if it diverts money from more harmful projects.

Over the next few years, further efforts should be made to set limits on all of the sources of stress on the valley's environment. Limits should be set based on containing and decreasing, not increasing, the existing stress on the Valley's environment. We are not entirely clear on whether the contemplated VERP process is everything that is needed, but we urge use of a pragmatic process that tests various levels of control to see whether desired improvements ensue, with adjustments to get needed results.

Finally, we urge that any further consideration of satellite parking lots be placed on hold until clean, quiet, non-intrusive alternate transportation is in place, operational, has secured funding, and has proven to be successful. And even then, it should be considered only if some mechanism is in place to limit ALL vehicular traffic, including busses of all kinds. And that is assuming problem-free sites can be found, which seems unlikely.

We look forward to working with you and the staff of the Park toward a process of better protecting the very special values of Yosemite Valley and the Merced River.

Sincerely,

George Whitmore, Chair Yosemite Committee Sierra Club