

13 February 1968

STATEMENT FOR YOSEMITE MASTER PLAN HEARING

by
George W. Whitmore

In the late 1890's San Francisco began its search for a water supply from the Sierra Nevada. It was found that water rights had already been largely taken up.

During the period 1896 to 1902 attention was drawn to the Tuolumne River's Hetch-Hetchy Valley and the Eleanor Creek branch. Enclosed within Yosemite National Park, these areas had water rights still unclaimed. Surveys were made and claims filed.

In 1901 political maneuvering resulted in legislation authorizing the Secretary of the Interior "to permit the use of rights through...the Yosemite...for...water conduits...plants, dams and reservoirs...." Several applications were made, and denied because the proposed reservoirs would destroy scenic and recreational values which the park had been created to protect.

Around 1903 to 1906 a commission headed by San Francisco's City Engineer reported upon certain "highly satisfactory sites" nearer the city. Although involving purchase of prior water rights the cost would have been no greater than that of developing the Tuolumne sites and transporting water over the greater distance.

In 1906, upon receiving encouragement from Chief Forester Gifford Pinchot, and upon the appointment of a new Secretary of the Interior, San Francisco again turned its efforts to the Tuolumne plan, even though the city had been about to conclude a transaction for another site.

From 1906 through 1913 a lengthy and complicated series of maneuvers ensued. During this period an Advisory Board of Army Engineers was appointed. Their report stated that:

"...there are several sources of water supply that could be obtained and used.... From any one of these sources the water is sufficient in quantity and...quality, while the engineering difficulties are not insurmountable. The determining factor is principally one of cost."

The almighty dollar finally won out in 1913 with the passage of the Baker Act, which authorized the inundation of these portions of Yosemite National Park.

William Keith, the artist, upon visiting Hetch-Hetchy Valley, "declared with enthusiasm that...in picturesque beauty and charm Hetch-Hetchy surpassed even Yosemite."

John Muir's notes of his first visit in 1871 to Hetch-Hetchy Valley describe it as "one of Nature's rarest and most precious mountain temples."

In a letter to President Theodore Roosevelt, dated 21 April 1908, John Muir wrote: "(the) falls and groves and delightful camp-grounds (of Hetch-Hetchy) are surpassed or equaled only in Yosemite." In the same letter he wrote: "this Valley...is a counterpart of Yosemite, and one of the most sublime and beautiful

STATEMENT--G. W. Whitmore

and important features of the Park, and to dam and submerge it would be hardly less destructive and deplorable in its effect on the Park...than would be the damming of Yosemite itself."

In view of the problems which are posed by huge numbers of people in Yosemite Valley, the loss of Hetch-Hetchy as a scenic and recreational resource is intolerable. The Tuolumne's water can be tapped farther down the river for diversion to San Francisco, and other sources of kilowatts and dollars can be found. But there is no substitute for the thousands of acres of recreational land which lie at the bottom of Hetch-Hetchy reservoir.

This land must be reclaimed by draining the reservoir and letting the silty flats reforest themselves. In years to come, Hetch-Hetchy can be developed for intensive recreational use, thereby taking some of the population pressure from Yosemite Valley.

The value of Yosemite National Park to the commercial interests of the region surrounding the park is obvious. I would like to point out that the value of Yosemite to these commercial interests would be greatly enhanced by conversion of the Hetch-Hetchy area to intensive recreational use similar to that in Yosemite Valley. I invite county supervisors, chambers of commerce, businessmen and taxpayers of the region surrounding Yosemite to join in helping to achieve the removal of these dams and the conversion of the valleys to a more appropriate and more valuable use which will benefit our entire population.

Testimony of
George W. Whitmore
Chairman of the Sierra Club's Yosemite Committee
before the
Subcommittee on National Parks, Recreation, and Public Lands
Committee on Resources
U.S. House of Representatives

Oversight hearing on the Yosemite Valley Plan

March 27, 2001

We offer our reactions to the final Yosemite Valley Plan.

We recognize that changes were made in the final Valley Plan in response to comments that we and many others made. We are particularly pleased that the Park Service 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 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 stresses include vehicles, emissions, roads, parking places, facilities, and unlimited 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 1980 General Management Plan's (GMP) visitor limit, this plan would look to a future Visitor Experience and Resource Protection (VERP) process to define new parameters, which might, or might not, be more effective in protecting the visitor experience and natural resources.

We feel it is a serious mistake to have eliminated the 1980 GMP's approach to the ever-increasing demand for access to Yosemite Valley without having some other mechanism in place to deal with it. Unless the problems created by infinite stress on a finite resource are resolved, the Organic Act's mandate for enjoyment by the public while leaving the resources unimpaired will be violated.

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, it appears that much of this restoration should move forward regardless of whether other parts of the Plan are ever implemented.

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. We strongly recommend that the Park Service recognize the possible need to make relevant changes in the Valley Plan if court decisions require revisions of the River Plan or a new River Plan.

CHANGES FROM THE DRAFT

However, we do note changes, some of them for the better, that were made in developing the final Plan. We are glad to see that, overall, there will be twenty fewer lodging units than in the draft Plan, 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.

We also note, however, that some elements in the final Plan are less satisfactory than in the draft. 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 Plan would be designed to achieve some very important goals compared to the existing situation:

- 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;
- 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 BUSES

While we welcome the pledge to use "the best available fuel and propulsion system technology to minimize noise and air pollutant emissions," additional buses 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 buses. We recommend immediate replacement of existing shuttle buses with new buses with much lower emissions. 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 emissions 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 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 buses have not.

We continue to urge that buses 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 buses using dirty fuels, rather than be opened. We believe that there should be a moratorium on the growing number of tour and YARTS buses, and their arrivals need to be scheduled at appropriate intervals.

And buses 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 buses need to be smaller so that they fit within the design parameters of the existing road system. Otherwise, the growing number of such buses 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 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, with no conclusion being promised even then.

This is particularly so with respect to growth in bus traffic. Buses 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 buses 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. While we suspect that the carrying capacity of Yosemite Valley is likely currently exceeded only a few days during the year, without an analysis and setting of limits those days could increase rapidly over time.

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 under consideration for inclusion in the federal endangered species list. 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 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 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 would be 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 of the Wild and Scenic Rivers Act, will meet the requirements of the Act. But we assert that 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 that 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 uniform 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 resolution of 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 adjusted based on containing and decreasing, not increasing, the existing stress on the Valley's environment after an analysis on the capacity of the valley to withstand various stresses. 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 management 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, based on the carrying capacity analysis. And that is assuming problem-free sites can be found.

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

Mr. RADANOVICH. Thank you, Mr. Watson.

Welcome, Mr. Whitmore. We look forward to your testimony.

**STATEMENT OF GEORGE W. WHITMORE, CHAIRMAN, SIERRA
CLUB'S YOSEMITE COMMITTEE, FRESNO, CALIFORNIA**

Mr. WHITMORE. Good afternoon, Mr. Chair and staff. Thank you for this opportunity. I am George Whitmore, Chair of the Sierra Club's Yosemite Committee.

I was born in central California and have been fortunate enough to have lived there, near Yosemite, most of my life. I have experienced Yosemite intensively and extensively over many years, starting as a child in the 1930's, and including many memorable years in the 1950's as a rock climber.

We agree with the stated intent of the Yosemite Valley Plan and are pleased that the Park Service did respond to public comments on the draft plan, to some extent, by cutting back on planned expansion at Yosemite Lodge and softening the draconian cuts in lower-cost accommodations.

However, we still have some very large concerns. Those concerns focus largely on transportation issues and on the impact which unceasing, infinite growth in day visitor usage has on a very finite Yosemite Valley. These two concerns are obviously closely inter-related. Former Interior Secretary Bruce Babbitt's often stated view that, "there is room for everyone in Yosemite, they just can't bring their cars" was overly simplistic. Unfortunately, it was the mandate the Park Service was given and it resulted in a flawed plan.

The new Valley Plan has abandoned the concept of limits which was in the 1980 general management plan. At the same time, no program has been put in place to address the consequent problem of ever-increasing stress on the visitor experience and on the natural resources. The only response to more and more day visitors seems to be planning for more and more buses, without acknowledging that buses can become the problem instead of cars.

Buses obviously could be part of the solution. Our concern is with the excessive focus on them which fails to recognize that they are already well on the way to becoming a worse problem than the cars.

There are several different bus systems serving Yosemite now—the long distant excursion or tour buses, the regional buses, including YARTS, which operate from the gateway communities, the in-Valley shuttle buses, and those which transport people to other points within the Park. In general, our comments apply to all types of buses.

These existing buses are already having an impact which needs to be reduced. They need to be cleaner, meaning fewer air-polluting emissions. Quieter, smaller, to reduce the demand for wider and straighter roads. And generally, less intrusive. There is a serious need to convert from diesel to a less harmful technology, and that is one area which probably would benefit from increased funding. But especially in the absence of cleaner, quieter, smaller and less intrusive, we object to the seeming acceptance of buses as being a cure-all.

Of course, what is driving the demand for more and more buses is the given parameter that "there is room for everyone in Yosemite". The concept of limits is certainly not foreign to the public. We encounter it routinely in so many aspects of everyday life and we adjust accordingly. To take an extreme example, even with an operation such as Disneyland, in which large crowds and crowding are accepted, sometimes the demand threatens the quality of the visitor experience, so the company takes steps to manage the

demand. It totally escapes us why this is considered not acceptable for Yosemite Valley.

We believe that if the Park Service would try a reservation system for day use, they would find it accepted by most people, especially if some of the available space were set aside for those who plan to visit at off-peak times or simply choose to take their chances. Such a system would eliminate the need for degradation of both the visitor experience and the natural resources which this Plan would allow—a degradation, incidentally, which would be in violation of the Park Service's own Organic Act.

We feel that the concepts employed in this Plan, while undoubtedly well-intentioned, have generally been taken too far. The zeal to improve the Yosemite Valley has resulted in a massive urban redevelopment plan. But this is not a city. It is the crown jewel of our National Park System, the incomparable valley, a world heritage site, the holy of holy. It deserves much better of us.

I would be happy to take any questions you might have.

[The prepared statement of Mr. Whitmore follows:]

**Statement of George W. Whitmore, Chairman, Yosemite Committee,
Sierra Club**

We offer our reactions to the final Yosemite Valley Plan.

We recognize that changes were made in the final Valley Plan in response to comments that we and many others made. We are particularly pleased that the Park Service 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 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 stresses include vehicles, emissions, roads, parking places, facilities, and unlimited 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 1980 General Management Plan's (GMP) visitor limit, this plan would look to a future Visitor Experience and Resource Protection (VERP) process to define new parameters, which might, or might not, be more effective in protecting the visitor experience and natural resources.

We feel it is a serious mistake to have eliminated the 1980 GMP's approach to the ever-increasing demand for access to Yosemite Valley without having some other mechanism in place to deal with it. Unless the problems created by infinite stress on a finite resource are resolved, the Organic Act's mandate for enjoyment by the public while leaving the resources unimpaired will be violated.

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, it appears that much of this restoration should move forward regardless of whether other parts of the Plan are ever implemented.

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. We strongly recommend that the Park Service recognize the possible

need to make relevant changes in the Valley Plan if court decisions require revisions of the River Plan or a new River Plan.

CHANGES FROM THE DRAFT

However, we do note changes, some of them for the better, that were made in developing the final Plan. We are glad to see that, overall, there will be twenty fewer lodging units than in the draft Plan, 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 House-keeping.

We also note, however, that some elements in the final Plan are less satisfactory than in the draft. 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 Plan would be designed to achieve some very important goals compared to the existing situation:

—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;—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 BUSES

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 recommend immediate replacement of existing shuttle buses with new buses with much lower emissions. 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 emissions 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 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 there should be 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 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, with no conclusion being promised even then.

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. While we suspect that the carrying capacity of Yosemite Valley is likely currently exceeded only a few days during the year, without an analysis and setting of limits those days could increase rapidly over time.

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 under consideration for inclusion in the federal endangered species list. 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 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 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 would be 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 E1 Portal road, which was so controversial. Moreover, if the proposed traffic check station is built at E1 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 E1 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 of the Wild and Scenic Rivers Act, will meet the requirements of the Act. But we assert that 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 that 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 uniform 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 resolution of 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 adjusted based on containing and decreasing, not increasing, the existing stress on the Valley's environment after an analysis on the capacity of the valley to withstand various stresses. 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 management 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, based on the carrying capacity analysis. And that is assuming problem-free sites can be found.

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

Oral summary of

George W. Whitmore
Chairman of the Sierra Club's Yosemite Committee
before the
Subcommittee on National Parks, Recreation, and Public Lands
Committee on Resources
U.S. House of Representatives

Oversight hearing on implementation of the Yosemite Valley Plan

April 22, 2003

I. INTRODUCTION

We thank you, Mr. Chairman and members of the Subcommittee, for having invited us to testify here in Yosemite Valley, in the very heart of the crown jewel of the entire National Park System. We ask permission to revise and extend our written testimony by inclusion of this oral testimony in the hearing record.

From the very beginning we have found some things in the Valley Plan which we like, and some things which we believe are not desirable. Being human, we tend to focus on the negative, which you will find in our written testimony. But something we need to make clear is that we believe the Plan can be improved without throwing it out and starting over. Using the present plan as a starting point, we need to move on, evaluating individual actions on their merits. We need to implement the less controversial provisions first, leaving the more questionable ones for later consideration.

II. OVERVIEW

- A. Too much is being done too quickly, with every appearance of a chaotic situation.
- B. It is difficult for the public to keep up with the countless projects. People seem not to be comfortable with the Park web site as a source of information. There needs to be more use of mailings to update the public. We are glad to see that a program of using e-mail for notices is being initiated.
- C. Litigation over the Merced Wild and Scenic River Comprehensive Management Plan still has not been resolved. There is a distinct possibility that a ruling adverse to the government could ultimately force significant changes in the Valley Plan. This should be taken into account when deciding which projects to move forward with.

- D. Simple, inexpensive, and low-impact measures would significantly reduce the perceived need for massive, costly, and harmful actions called for in the Valley Plan. Examples would be re-designing a few problem road intersections, and providing adequate directional signs to help the visitor find his way around.
- E. A day-use reservation system, by directing people away from the peak periods, would vastly reduce the perceived need for massive parking lots and bussing systems. It probably would result in a net increase in annual visitation because people would be assured of getting in and would find their visit more enjoyable. That assumes that a reasonable number of slots would be set aside on a first-come-first-served basis, ensuring that people would usually get in even if they did not have a reservation.

III. OTHER TRANSPORTATION ISSUES

- A. Northside Drive should not be closed. The widening of Southside Drive, which would be required to handle the increased two-way traffic satisfactorily, would cause massive damage to the flora, fauna, and scenery.
- B. Realignment of Northside Drive in the Yosemite Lodge vicinity is not necessary. It would have been possible to redesign the problem four-way intersection without the damage which is being done by the Lower Fall project, and without moving overnight accommodations closer to the rockfall zone, as is being planned.
- C. Segment "D" of the El Portal road (Highway 120/140 junction to Pohono Bridge) requires only minimal work to stabilize the flood damage. Rebuilding it to the same standards as used on the portion already reconstructed would result in far worse damage than has already been done, and is not necessary. The curves and gradients used as justification on the earlier project are not a factor on this segment.
- D. We support efforts, including those by organizations such as YARTS, to address regional transportation issues which affect Yosemite provided those efforts advance the goals of the 1980 General Management Plan.
- E. One of the biggest deficiencies of the Valley Plan is its failure to address the ever-increasing demand for access to the Valley by highly polluting and noisy tour busses. It is inconsistent to focus on getting rid of cars while doing nothing to prevent the polluting intrusion by busses of all kinds, including tour busses.
- F. We appreciate Mr. Radanovich's interest in seeking cleaner air for Yosemite, and we support a fuel cell project provided the goal is to make progress toward cleaner air in Yosemite.

- G. The present fleet of old and polluting Valley shuttle busses should be replaced, but we are not convinced that diesel-electric hybrids meet the standard of "the cleanest busses in the world" as articulated by John Reynolds before this Subcommittee on March 27, 2001. We have been seeking data from the Park Service which compares diesel hybrid emissions against the alternatives, but have not seen it yet. Were we to see satisfactory data, we would be happy to support the Park Service in their choice.
- H. Expansion of the Valley shuttle routes to the west end of the Valley, as called for in the Valley Plan, should be implemented sooner rather than later, and most certainly before making it even more difficult for people to use their cars.
- I. No more day-use parking should be removed without providing suitable alternatives to use of the private auto.

IV. CAMPGROUNDS.

We support the decision to restore the Upper and Lower River Campground sites to natural conditions. We also support the expansion of additional camping outside Yosemite Valley as suggested by recent Park studies. Providing free shuttle service from outlying campgrounds into the Valley would greatly enhance the appeal of these campgrounds, and would fit well with expansion of the Valley shuttle to the west end of the Valley.

V. CONCLUSION

Again, we thank you for the opportunity to testify, and would be happy to take any questions you might have.

Outline of oral testimony as actually presented. Prepared 26 April 03 from notes made during the hearing. [] = material inserted. Speaking time: 4 minutes, 30 seconds.

George W. Whitmore
Chairman of the Sierra Club's Yosemite Committee
before the
Subcommittee on National Parks, Recreation, and Public Lands
Committee on Resources
U.S. House of Representatives

Oversight hearing on implementation of the Yosemite Valley Plan

April 22, 2003

I. INTRODUCTION

Thank you, Mr. Chairman and members of the Subcommittee, for having invited us to testify here in Yosemite Valley, in the very heart of the crown jewel of the entire National Park System

[You will be glad to know that I have decided to truncate my summary even further, so you will be hearing just the major points.]

From the very beginning we have found some things in the Valley Plan which we like, and some things which we believe are not desirable. Being human, we tend to focus on the negative, which you will find in our written testimony. But something we need to make clear is that we believe the Plan can be improved without throwing it out and starting over. Using the present plan as a starting point, we need to move on, evaluating individual actions on their merits. We need to implement the less controversial provisions first, leaving the more questionable ones for later consideration.

II. OVERVIEW

A.

B.

C.

D. Simple, inexpensive, and low-impact measures would significantly reduce the perceived need for massive, costly, and harmful actions called for in the Valley Plan. Examples would be re-designing a few problem road intersections, and providing adequate directional signs to help the visitor find his way around.

- E. A day-use reservation system, by directing people away from the peak periods, would vastly reduce the perceived need for massive parking lots and bussing systems. It probably would result in a net increase in annual visitation because people would be assured of getting in and would find their visit more enjoyable. That assumes that a reasonable number of slots would be set aside on a first-come-first-served basis, ensuring that people would usually get in even if they did not have a reservation.

III. OTHER TRANSPORTATION ISSUES

- A. Northside Drive should not be closed. The widening of Southside Drive, which would be required to handle the increased two-way traffic satisfactorily, would cause massive damage to the flora, fauna, and scenery.
- B. [The following point might seem minor, but I am including it because it is symptomatic of larger problems which have occurred, and will continue to occur.] Realignment of Northside Drive in the Yosemite Lodge vicinity is not necessary. It would have been possible to redesign the problem four-way intersection without the damage which is being done by the Lower Fall project, and without moving overnight accommodations closer to the rockfall zone, as is being planned.
- C.
- D. We support efforts, including those by organizations such as YARTS, to address regional transportation issues which affect Yosemite provided those efforts advance the goals of the 1980 General Management Plan.
- E. One of the biggest deficiencies of the Valley Plan is its failure to address the ever-increasing demand for access to the Valley by highly polluting and noisy tour busses. It is inconsistent to focus on getting rid of cars while doing nothing to prevent the polluting intrusion by busses of all kinds, including tour busses.
- F.
- G.
- H. Expansion of the Valley shuttle routes to the west end of the Valley, as called for in the Valley Plan, should be implemented sooner rather than later, and most certainly before making it even more difficult for people to use their cars.
- I. No more day-use parking should be removed without providing suitable alternatives to use of the private auto.

IV. CAMPGROUNDS.

We support the decision to restore the Upper and Lower River Campground sites to natural conditions. We also support the expansion of additional camping outside Yosemite Valley as suggested by recent Park studies. Providing free shuttle service from outlying campgrounds into the Valley would greatly enhance the appeal of these campgrounds, and would fit well with expansion of the Valley shuttle to the west end of the Valley.

V. CONCLUSION

Again, we thank you for the opportunity to testify, and would be happy to take any questions you might have.

Testimony of

George W. Whitmore
Chairman of the Sierra Club's Yosemite Committee
before the
Subcommittee on National Parks, Recreation, and Public Lands
Committee on Resources
U. S. House of Representatives

Oversight hearing on implementation of the Yosemite Valley Plan

April 22, 2003

I. INTRODUCTION.

We appreciate having been invited to testify before the Subcommittee.

II. OVERVIEW of the Valley Plan and associated problems.

A. Too much is being done too quickly.

A chaotic situation has been created wherein so much is being attempted so quickly that it seems inevitable that one project will end up conflicting with another, or simply create more problems because other things should have been done first.

As an example, we cite the Lower Yosemite Fall project. Replacement parking for the tour busses ultimately is supposed to be created behind the Village area, but that project is not even being mentioned. In the meantime the tour busses will be shunted from one temporary site to another in the Lower Fall area because their previous parking is being removed. And, continuing a long tradition, more automobile parking is being removed without any improvement in the Valley shuttle bus service to facilitate a transition to less reliance on private autos.

B. Problems with public notification and input.

Adding to the chaos, the Park Service keeps asking for public input, but it is difficult for the public to be aware of what is happening. So it's hardly surprising that they don't have enough information to comment in a rational manner.

The Park Service has been conducting a series of Open Houses on their planning and projects. These offer an immense amount of information and are very useful. But they have almost all been during the week and during the day, so very few people would be able to attend them even if they were aware that the event was occurring. (There will be another one on Wednesday, the day after this hearing, from 2:00 p.m. to 6:00 p.m.)

The Park Service relies excessively on their web site. Many people simply are not in the habit of getting their information this way. There needs to be more use of mailings to update the public on projects, planning, and comment deadlines.

C. Potential problems because of litigation.

Another reason for slowing the pace of development in the Valley is because litigation over the Merced River Plan still has not been resolved. It is currently before the Ninth Circuit Court of Appeals and the likely outcome is not at all clear. The River Plan is supposed to provide a foundation for the Valley Plan (as directed by a District Court judge), and projects now underway might have to be placed on hold if the Circuit Court should find even one problem with the River Plan. Particularly if that one problem happens to be the failure to "address user capacity" as called for by the Wild and Scenic Rivers Act. That issue alone could pull the underpinnings out from much of what is in the Valley Plan.

D. Simple measures would yield large results.

Much of the development called for by the Valley Plan would not be necessary if simple steps were taken to deal with congestion. There are a few problem road intersections which have been allowed to fester for decades. Why not redesign those intersections instead of turning the whole Valley upside down? Again, inadequate or confusing directional signs has been a problem for decades. Instead of providing better signs, the Park Service points to the confused drivers going around and around and says the solution is to get rid of the drivers and their cars.

E. Day-use reservation system: simple and effective.

And the most obvious solution of all to deal with the congestion which occurs a relatively small portion of the year would be to implement a day-use reservation system with a portion of the slots being available on a first-come-first-served basis. That way those who need to be assured of getting in on a specific date would have that assurance, while those who prefer a more spontaneous approach would probably still get in. Most of the time there is simply not a problem of too many people or too many cars.

There is much anecdotal evidence that many people don't come because they think it is crowded, or they won't be able to get in, or they won't be able to drive their car in. A reservation would ensure their getting in, and would steer them away from the times that do tend to be crowded. We suspect that a reasonably implemented day-use reservation system would actually reverse the continuing decline in annual visitation, as well as improve the quality of the visitor's experience.

We hasten to point out that the Valley Plan actually moved AWAY from the concept of a day-use reservation system. The idea was implied in the 1980 General Management

Plan, but that seminal beginning was deleted by amendment through the Valley Plan process. It is one of the reasons that we are less than enthusiastic about the Valley Plan.

This action of the Valley Plan was actually in contravention of the Park Service's own regulations, which direct that every unit of the National Park System address the carrying capacity issue. This requirement was brought out in the General Accounting Office's November 15, 2002 report on transportation projects in the National Park System ("National Park Service: Opportunities to Improve the Administration of the Alternative Transportation Program").

III. OTHER TRANSPORTATION ISSUES in addition to those mentioned above.

A. South Side Drive widening and North Side Drive closure.

While it is not on the table yet, we dread the day that the Park Service starts widening South Side Drive in anticipation of closing North Side Drive. At present, South Side Drive (as well as North Side Drive) provides two lanes of one-way traffic, making for the safe and pleasant movement of movement of different types of vehicles in one direction. Faster and slower...autos, busses and bicycles...all are accommodated smoothly.

In order to move traffic as well if it were two-way, as called for in the Valley Plan, four lanes would be required. Huge numbers of trees would have to be removed, and an ugly swath of asphalt inviting high speeds would take their place. The very idea is an abomination which never should have found its way onto paper. To keep it at two lanes (one in each direction) would result in gross traffic congestion, a high accident rate, and an unpleasant visitor experience.

And all this because someone thought it would be a good idea to close North Side Drive to traffic. JUST LEAVE THINGS ALONE! This is a prime example of failure to anticipate that "restoration" of North Side Drive would inevitably result in gross destruction of natural values and quality of the visitor experience on South Side Drive.

B. Realignment of North Side Drive in vicinity of Yosemite Lodge.

Again, why can't it just be left alone? Because the Lower Fall project has already committed the Park Service to another project which doesn't make sense. The four-way problem intersection could easily have been fixed without a massive realignment of North Side Drive, or moving overnight lodging closer to the rockfall zone. The entire Lower Fall, Lodge redevelopment, and North Side Drive realignment complex of projects is an example of planning run amuck. A massive urban redevelopment project, without regard for the fact that this is a national park.

C. Segment "D" of the El Portal road (Highway 120/140 junction to Pohono Bridge).

While it is not on the table yet, and the environmental reviews have not been started, it is quite clear that the Park Service has every intention of raising this segment of road to the same standard as the newly completed section. And this is in spite of the fact that the gradients and curves that provided the rationale for the other construction do not exist on Segment "D". Although portions of the road require stabilization because of flood damage, this could be accomplished without the massive impacts to the landscape that would be required if the road were reconstructed to the same standard as that already done. Rather than a blind insistence on uniform widths just for the sake of uniformity, we ask that the road not be rebuilt except as necessary for safety.

D. YARTS.

Because there continues to be misunderstanding as to the Sierra Club's attitude toward YARTS, we wish to make it clear that we support efforts, including those by organizations such as YARTS, to address regional transportation issues which affect Yosemite provided those efforts advance the goals of the 1980 General Management Plan. Those goals include reduction of traffic congestion, reduction of overcrowding, and promotion of visitor enjoyment.

We should also add that we strongly urge that transportation systems be implemented in such a way as to make progress toward cleaner air.

E. Tour (excursion) busses.

One of the biggest deficiencies in the Valley Plan is its failure to address the ever-increasing demand for access to the Valley by tour busses. The Plan makes much of the problems which are perceived to be caused by autos, with Draconian restrictions on their use. Yet it simply ignores the potentially far worse problem which will be caused by unlimited numbers of highly polluting and noisy tour busses.

It is our understanding that the Park Service has the authority to regulate tour bus access to the Park, and could require that the busses meet specific emission standards as a condition of entry. If the Park Service does not have that authority, it seems that enabling legislation would be appropriate. If they already have the authority, it seems that they need to be encouraged to move in that direction.

And, to the extent that tour busses are carrying day-use visitors, our comments above regarding the wisdom of a day-use reservation system would apply to tour busses also.

F. Fuel cells.

We appreciate Mr. Radanovich's interest in seeking cleaner air for Yosemite, and we support a fuel cell project provided the goal is to make progress toward

cleaner air in Yosemite. Apparently the project would not necessarily be for a bus; if it is for a stationary facility, we suggest Crane Flat because the electricity supplied there now is from a diesel generator.

G. Valley shuttle busses.

We would like to see the present fleet of old and polluting diesel busses replaced with vehicles which would match former Western Regional Director John Reynolds' vision of "the cleanest busses in the world", as articulated by him before this Subcommittee on March 27, 2001.

We are not convinced that a diesel powered electric hybrid bus would meet that vision. We would like to see a comparison of the alternatives, including propane powered electric hybrid, gasoline powered electric hybrid, and straight propane powered. If emissions data shows that diesel powered hybrids would be the cleanest and otherwise suitable, we could support that. But diesels have such a bad reputation that it seems hard to believe they would prove to be the cleanest just because they are put into a hybrid application. It seems as though the others would also be cleaner in the hybrid application, still leaving diesel at a relative disadvantage. Like I said, we would like an opportunity to review the comparative data, but have been having some difficulty getting the information.

H. Expansion of the Valley Shuttle Routes.

It would seem that this is one of the less controversial actions called for in the Valley Plan, and has the potential for reducing congestion and facilitating visitor access. Yet we see no indication that the Park Service has any plans for taking it up in the foreseeable future. We believe they have indicated that they would first have to build a series of stops complete with rest rooms, so they are looking upon it as a massive undertaking.

It seems self-evident that people drive all around the Valley now, stopping and getting out of their cars, at countless places where there are no rest rooms. We see no reason why public transportation could not be provided on the same basis.

I. Day-use parking.

As alluded to above, we find it highly inappropriate for the Park Service to continue to remove day-use parking without first providing suitable alternatives to the use of the private auto. Much of the congestion which actually occurs is the result of removal of parking, which has been ongoing for at least the last twenty years. We are usually in favor of removing asphalt, but not if it is simply going to get laid down somewhere else (as called for in the Valley Plan), and not if it results in degradation of the visitor experience (as called for in the Valley Plan)

IV. CAMPGROUNDS.

We support the decision in the 2000 Yosemite Valley Plan to restore the Upper and Lower River Campground sites to natural conditions. We also support the expansion of additional camping opportunities outside Yosemite Valley as suggested by recent Park studies. In particular, we support the 1980 General Management Plan provision that there be "in kind" replacement of camping opportunities to compensate for those which are removed from Yosemite Valley.

We note that there has been a continuing long-term process of reducing camping opportunities throughout the Park. It appears to be part of the pattern of phasing out lower-cost accommodations, and putting in higher cost accommodations, which has manifested itself so clearly in the Yosemite Valley Plan. Recognizing that it is difficult to find suitable locations for new camping opportunities in the Valley, we feel there is all the more reason to make every effort to find appropriate locations as near as possible outside the Valley.

Another way of compensating for the loss of campgrounds within the Valley would be to provide adequate shuttle service into the Valley from outlying campgrounds.

V. CONCLUSION.

We thank you for the opportunity of testifying.

My name is George Whitmore, and I reside in Fresno. I am Chair of the Sierra Club's Yosemite Committee. I am speaking on behalf of the Sierra Club.

The following comments have been prepared in written form to ensure that what I say comes across as intended.

Because we will be somewhat critical of the Draft Merced River Plan Revision, we want to make it abundantly clear that we are NOT attacking the individuals within Yosemite National Park, or the consultant entity, who were responsible for giving direction or who actually were involved in preparation of this Plan. That includes those from the Denver Park Service office with whom I have had interaction. Without exception, I find all of you to be likable, open, and helpful, and I have the distinct impression that you are all well-intentioned and that you would like to see a high quality visitor experience made available, while providing a very high level of resource protection.

Those are goals that we share.

We believe that the direction which has resulted in a poor Plan has come from elsewhere, not the people with whom I have had the pleasure of talking.

The Draft Merced River Plan is a mass of contradictions, illogical statements, confusing and inconsistent jargon, and so-called "information" presented in such a way as to defy analysis. The document is internally inconsistent, rendering meaningless any public attempt to comment on content.

The extensive series of public meetings which the National Park Service has been conducting throughout California have made it abundantly clear that those who have attempted to read the document or understand the issues are totally confused. Even some in a sister land-management agency have said that the Plan is a "convoluted mess", and have asked, "How are we supposed to comment on it?" These are people who work for a living analysing EIS's.

DISCLOSURE of the intended action is at the very heart of the NEPA requirements under which this Plan/SEIS was produced.

The Plan/SEIS utterly fails that most basic requirement --- to let the public know what it is that the Park Service intends to do.

The present situation is so chaotic that the Park Service needs to continue taking comments to find out what the problems are, then issue a Revised Draft Plan or possibly a Supplement.

The Revised or Supplementary Draft then would require a NEW COMMENT PERIOD. Only then would the public be able to make comments that are relevant. In the absence of a new document and a new comment period, the

final result probably would be subjected to further litigation.

A new draft, or supplement, and a new comment period, would be the only way that the Plan could be NEPA compliant. The present document simply doesn't cut the mustard.

A new comment period is critical, because that would mean that the revisions were substantial. Any minor tinkering that would avoid the need for a new comment period would NOT be adequate. The present draft requires MAJOR overhaul if further litigation is to be avoided.

The Park Service's preferred alternative does NOT describe any meaningful way of addressing excessive impacts other than directing people to other areas of Yosemite Valley or the Park, thereby transferring the impacts to new areas. This would have a huge impact on the quality of the visitor experience as well as on the natural resources, yet we find little, if any, discussion of these impacts.

In fact, buried in the document is a statement to the effect that these draconian actions could be taken without any further environmental review. If you are going to cram people into a "one size fits all" straitjacket, micromanaging the visitor experience, and damaging the natural resources in the process, we believe it requires further review, AND PUBLIC COMMENT.

A revised document could avoid this unacceptable proposed management direction if it proposed a day use reservation system. People could be assured of getting into the Park, and once in they could be free to enjoy the Park in a way that they would choose, rather than in a way that the Park Service would choose for them.

It is essential that a new document contain significant discussion of a day use reservation system as being a necessary management tool to deal with excessive impacts while preserving the quality of the visitor experience.

It is imperative that a Revised Draft or Supplement be issued, with a new public comment period. This would entail some delay, but the alternative would be further chaos, delay, and frustration.

Thank you for listening.

7 March 2005