To: Jeff McGraw

From: George Whitmore < geowhit@qnis.net>

Subject: need documentation

Cc:

Bcc: Jim Blomquist

Hi Jeff---

I keep hearing that there is a CARB report that says, given actual real world ridership patterns, getting people out of cars and into diesel buses actually results in an increase in air pollution. (I suspect it depends on how the "quantity" of pollution is measured—— is it in tons of total emissions? Obviously there is an increase in Nox, particulates and other carcinogens, sulfates, etc. But I would guess maybe a decrease in CO. And does ozone go up or down; that is a really big one in the Central Valley, and is apparently the main culprit in damaging the Sierran forests. Maybe diesels kill people while sparing the forests, so do we have Hobson's choice?

To get to the point: How do we get a copy of this CARB report? I have asked other people for it several times, but don't get much help. Now I am being asked again to substantiate our claim.

It would really help if we would produce the report in black and white, or at the very least be able to cite the relevant sections of it. (Like maybe quotes, with page numbers and exact title of document so someone can look it up if they want to.)

Interesting aside: At the Sierra Club RCC meeting in San Francisco last Saturday there was extensive discussion about a proposed ferry system on S.F. Bay. They were not kindly disposed to the idea, and one of the reasons given was that people who leave their cars and ride ferry boats actually end up creating more air pollution than if they had driven their cars. I don't know what the statement was based on, but it was interesting nevertheless.

Thanks for any help you can provide, Jeff.

George.

joyce eden, greg ad, 01:16 PM 1/12/01, diesel buses vs. cars

To: joyce eden, greg adair, David Underwood, Jeff McGraw, Mike McCloskey

From: George Whitmore < geowhit@qnis.net>

Subject: diesel buses vs. cars

Cc:

Bcc: sylvia, George

Hi Joyce, Greg, David, Jeff, & Mike---

Below is an extract from a message I sent Jeff McGraw, and below that is an extract from his reply. The bottom line seems to be that we are not able to substantiate our claim that getting people out of cars and into diesel buses would result in more pollution, not less.

If we cannot substantiate it, I really think we better stop making the assertion, especially when we say, "There is a CARB report that says..." David in particular is big on demanding "facts," and this particular argument is breaking down in the absence our ability to prove the facts (i.e. produce the documentation).

There has been so much smoke (no pun intended) on this issue that there must be some fire, but where is it? I would be overjoyed if someone could come up with the documentation, but in the meantime I think we better drop this particular argument. George.

(Those who were at the meeting last Saturday of the Northern Division of the CNRCC will recall that, during the discussion of ferry boats on San Francisco Bay, someone asserted that getting people out of their cars and into ferry boats would result in more pollution, not less. If anyone can find out who said that, maybe we could find out what they were basing their claim on.) gww

Hi Jeff---

- > I keep hearing that there is a CARB [California Air Resources Board] report that says, given actual real world ridership patterns, getting people out of cars and into diesel buses actually results in an increase in air pollution.....To get to the point: How do we get a copy of this CARB report? I have asked other people for it several times, but don't get much help. Now I am being asked again to substantiate our claim.
- > It would really help if we would produce the report in black and white, or at the very least be able to cite the relevant sections of it. (Like maybe quotes, with page numbers and exact title of document so someone can look it up if they want to.).......... [from George].

[to George]

As to whether there is a document like the one you're describing, I haven't seen anything like that myself...... CARB isn't doing environmentalists looking for answers to general issues like the ones you've raised any favors. That isn't how they're set up. [from Jeff].

To: Tom Janecek

From: George Whitmore <geowhit@qnis.net>

Subject: proposed newpaper article

Cc: Bcc:

Tom---

I disclaim any responsibility whatsoever for the following. It was sent to the Kern-Kaweah Chapter for their newspaper, with a copy to me for review. I am at a loss as to how to respond, and thought maybe I should simply put it before you to see what your reaction would be if someone sent it to you with a request that it be published. (There is a major factual error which runs throughout it, but don't worry about that; the document is properly called the "Valley Plan." The "Valley Implementation Plan" was a prior document which was never completed, and the process instead was shifted over to what became the "Valley Plan.")

Would you publish the piece as it appears below? Would you attempt to edit it? Would you refer it to someone else to be re-worked? Would you consult with anyone to see whether it accurately reflects the Sierra Club's views? Would you attempt to shorten it? In other

words, what would your reaction be? Thanks. George.

Comments on the latest National Park Service (NPS) proposals for Yosemite Valley.

This article focuses on the 2000 Valley Implementation plan (VIP). There is also a River Management Plan that has to be considered but is not covered in this report. The RMP and the 1980 General Management Plan (GMP) supercede the VIP and their impact will be discussed at a later date.

Recently the NPS released signed a Record Of decision (ROD) for the VIP. A cursory examination of the plan as adopted appears to be a real attempt to solve many of the problems that currently exist.

Upon closer examination it will be seen that these plans do not do what the NPS says they do.

Transportation

The VIP proposes to reduce car traffic. Institute a bus system for day use visitors. Close Northside Drive to through traffic. Create satellite parking areas outside the park. Adds six units to Yosemite Lodge. Provides for 500 camp sites (300 less than before the 1997 floods provides for 16 bus bays at the visitor center and parking for 25 buses. The NPS states that they are putting more land under restoration, however they are using some acreage that has already been removed from use due to the 1997 floods including camp six, which is now a parking lot. The VIP also calls for widening of Southside Drive. This will mean cutting of some old growth timber and habitat encroachment.

Using the NPS's own data a closer examination shows that . During the busiest hours of the 100 busiest days, there would be a bus past Bridalveil Falls every 25 seconds. This includes tour buses, park buses, and transit buses. There is no limitation on the number of tour buses that would be allowed to enter the valley. Car parking would be limited to 500 spaces adding to the congestion. However, there is nothing to stop a motel owner outside the park from getting a commercial permit and offering tour services to the motels patrons. Currently 400 tour bus companies provide 18,000 trips a year to the valley. All these buses are diesel powered along with the diesel buses powered by 1980 two stroke engines just leased by the park concessionaire, Delaware North. Two stroke diesels emit almost twice the particles and NOx emissions that the newer engines do. A recent studies by the California Air Resources Board CARB) produced this result:

"Current diesel urban buses usually emit more emissions of oxides of nitrogen (NOx) and PM than if all bus riders were driving separately." (CARB, Staff Report: Initial Statement of Reasons, Proposed Regulation for a Public Transit Bus Fleet Rule and Emission Standards for New Urban Buses, December 10, 1999, p. 1). NPS data shows that cars entering the valley contain an average of 3.9 passengers. Buses usually are not full, thus the emissions from one bus are equal to 150 cars. Cars have become cleaner in the past few years with emissions almost negligible. The NPS's computer model study of diesel emission has several flaws

regarding levels of particulate emission and nitrous oxides. One particular flaw shows a summertime temperature assumption of 63 deg. F. While this may be true of the 24 hour average, it is not true of the daily summertime average when these buses are in the valley. This study also uses a 24 hour base line that skews the actual allowable emission level. In addition 80% of the particulates are below 2 microns. These particulates damage lungs, cause respiratory diseases and are carcinogenic The NPS sets the particulate limits for particles below 10 microns but not below 2 microns. Over 800 tons of wood is burned in campfires every year contributing to serious air quality problems in the valley.

Noise level studies of buses show them to be four to eight times as loud as a car. To illustrate this noose level you have to be less than a50 feet from Yosemite Falls to drown out the sound of a bus engine 200 feet away. These noises carry to the top of the valley walls where one would hope to find peace and quiet.

The plan also proposes moving the heavy maintenance to El Portal at the western entrance to Yosemite, but keeping a fueling station in the service area. This requires the trucking in of large quantities of fuel from outside the park. The VIP calls for three satellite parking lots on the park perimeter. There is no data to show how large these areas would be, or what services they would offer. Areas proposed are: Badger Pass at the southern entrance. The sewage system there can not accommodate the number of proposed visitors. Hazel Green which at the northern entrance. It would be on private land but would require a connecting road be built through undeveloped forest to meet the Tioga road. El Portal which is a small community at the western entrance. There is some land available there but it is also private and much of the land in the area is seasonal wetlands. Foresta is currently referred to as an "alternative to" the Hazel Green sites on the highway 120 corridor should Hazel Green not work out. On the apparent assumption that the satellite parking areas must be built The site in question adjoins the upper reaches of a seasonal creek/wetland, and drains into Big Meadow. Big Meadow is in good shape, relatively free of hydrocarbon pollution. In any case, there is currently no plumbing, electrical, or sewage for the site. Nearby Foresta runs from individual wells, septic tanks, and an electric cable strung up the back access road from El Portal. The NPS has not provided any studies or data to show the impacts such satellite parking will have on these areas. What can be determined however, is that such facilities will simply add to the urbanization of land on the perimeter of the park reducing its insulation from urban areas presently further away. At present the nearest large town, Mariposa is 60 miles distant, satellite parking just brings urbanization to the park boundaries.

GMP was created cars have become cleaner but diesel buses have been shown to cause far more pollution than previously thought. The NPS has identified 100 days during which the valley traffic exceeds the carrying capacity determined in the 1980 General management Plan (GMP).

Making the valley a better place to visit and giving the visitor a good experience will require some fundamental changes in NPS policy. Limits are needed on vehicles and visitors. Tour buses must be placed on a schedule at all times keeping them separated by several minutes. All day use vehicles need to placed on a reservation system during the 100 impacted days. In park tour buses need to be propane powered and all larger vehicles need to be quieter.

More riparian areas need to be protected and low cost camp sites provided. Restriction should placed on all vehicles that do not meet California State emission standards.

To: Yosemite Committee

From: George Whitmore <geowhit@qnis.net>

Subject: legislation?

Cc: Mike / Alan / Joe, Barbara Boyle, Carl Zichella

Bcc:

Hello Yosemite Committee + Mike McCloskey, Alan Carlton, Joe Fontaine, Barb Boyle, & Carl Zichella---

In the middle of Barbara Boxer's statement to the U.S. Senate explaining why she would vote against confirming Gale Norton for Interior Secretary was an interesting quote re. Yosemite. "(Boxer) asked, for instance, whether....(Gale Norton) would actively promote and support the much-heralded new management plan for Yosemite National Park." (Boxer was disappointed that Norton was not familiar with the issue or had not taken a position.)

This was not the first indication we have had that Boxer thinks the Valley Plan is simply wonderful. It is consistent with information that suggests some legislators are thinking of legislation to help implement the VP, perhaps as a counter to the possibility

of other legislation (Radanovich) intended to kill the VP.

As you know, we don't have a position on this. Some of us seem to want congressional attention, while others fear the results could be disastrous and we should not encourage it. My own view is that we should neither oppose nor encourage congressional attention, but be prepared to deal with it if it comes.

That's easier said than done. We have a number of loose ends to deal with within the

Club.

1. We say we want camping restored to the pre-flood levels. (800 units instead of the units should be located. In the middle of the areas the NPS has slated for restoration?

If not there, then where?

We don't want parking in the Camp Six area, but where do we want it. Do we want it 500 called for in the VP) But I haven't heard us say where we think those additional 300

reduced even further in order to stay out of Camp Six, or do we want it to be dispersed as at present? What is our view of the VP reduction of parking (day use visitor) to one-third of what it is now? I think we have been relatively silent on the subject. (It would be a MAJOR issue in any congressional hearing.)

3. What is our view of the planned employee housing structure next to Curry Village? (I am told it is intended for the employees currently housed in the middle of the parking lots at Yosemite Lodge and behind the post office.) I know our postion is that employees should be housed outside the Valley, but it is unclear to me whether we accept the idea that it is not practical to move EVERYONE out, at least for now.) Also, I know we have said no new construction in the Valley; does that mean we want the employees to continue to live in the middle of the parking lots?

4. As for no new construction, are we opposed to moving the grocery store, beauty shop, etc. to the Curry Village area? Would we be opposed to using the present grocery store structure for a visitor center? (Other than saying "no new construction," we have not

discussed this.)

5. We have said we want buses to be clean, quiet, small, and non-intrusive (no traveling billboards, for one). This seems to be pie-in-the-sky, but what if it actually came to pass; would we be opposed to them anyway? (As for "clean," are we agreed that it does NOT mean low-sulfur diesel? That it means abandoning diesel altogether?)

6. We have said we feel Northside Drive should remain open to motor vehicles, in order to avoid the increased congestion on Southside Drive which would lead to substantial widening of it. WHAT IS OUR VIEW OF THE PROPOSED REMOVAL OF THE STONEMAN/AHWAHNEE ROADS? My impression is that it would result in comparable problems on the whole south side east of Sentinel Bridge.

7. What is our view of the proposed bridge removals? (I don't recall any discussion at all.)

8. What is our view of removing the stables from the Valley? Of moving them to Foresta? (Again, we have not discussed this, but it's in the Plan.)

1

To:

From: George Whitmore <geowhit@qnis.net>

Subject:

Cc: Bcc:

20 August 2001

George Whitmore Chair, Sierra Club Yosemite Committee PO Box 5572 Fresno, CA 93755

Attn: Scoping Comments, Yosemite Falls Restroom Relocation yose planning@nps.gov
FAX 209 372 0456
Superintendent
Yosemite National Park
PO 577
Yosemite, CA 95389

Superintendent Mihalic:

Re: Sierra Club Scoping Comments, Yosemite Falls Restroom Relocation

The following are the Sierra Club's Scoping comments on the Lower Yosemite Falls project. Although the National Park Service has called for scoping for a new bathroom in the Lower Yosemite Falls project area, to comment only on the bathroom would be to acquiesce to an illegal piecemeal planning process. The Lower

Yosemite Falls project has neither been put out for public scoping as a project nor for public comment in any meaningful or appropriate manner and certainly has not fulfilled the mandates of the National Environmental Policy Act. Therefore the following comments are to be considered as scoping regarding the Lower Yosemite Falls area and project. We have referred to "Restroom Relocation" in the subject headings above only to assist you in your filing system.

Planning for a project of any size in the Lower Yosemite Falls area must be done in the context of a valid protective plan for the Merced Wild and Scenic River and a transportation plan. Neither of these has been accomplished.

We appreciate the opportunity we had to walk-through the project area with Chip Jenkins of the National Park Service and Bob Hansen of the Yosemite Fund on August 11, 2001. However, we were surprised at the lack of any map of the area being offered to us by either of them, in the light of all the planning that is apparently going on, and on their inability to answer most of the questions put to them about the plan. We do not agree with the comments of Chip Jenkins who stated during the walk-through, that non-wilderness natural areas in the park, such as the Lower Yosemite Falls area, should conform to urban/suburban design intentions. Yosemite Valley and the Lower Yosemite Falls area are not a city park and should not be treated nor designed as one. They are part of Yosemite National Park, and should be treated as such.

The failure of both the Merced River Plan and the Yosemite Valley Plan to address user capacity is evidenced in the Lower Yosemite Falls plan. The Valley Plan appears to identify three purported reasons for the project: Visitor experience, Americans with Disabilities Act (ADA) and restoration of areas to natural conditions. These are based on invalid assumptions, mushy logic and/or inadequate or non-existent data or surveys as follows. The situation appears to be a classic case of a "solution" looking for a "problem."

The Visitor Experience:

While the Yosemite Valley Plan admits that, "the number of people on the [Lower Yosemite Falls western] trail was not seen as a major problem," it still appears to base the widening of the western trail to 16' in width and the expansion of the Lower Falls viewing area on a completely inadequate and flawed survey (Manning, 1998) of visitors perceptions of "crowding". Yet, an analysis of this "survey" does not support the perception of "crowding" as a problem, either on the western trail or at the viewing area of Lower Yosemite Falls.

Based on the survey's own figures, the sample of visitors "surveyed" at the Lower Falls areas was a paltry 0.008% of the average numbers of visitors per day at the Lower Falls trail-head. In addition, the visitors were not asked for their perceptions of the actual numbers of visitors on the trail or at the Lower Falls; but rather, were asked to look at photos representing numbers of visitors to assess their perception of the amount of crowding. The "photos" were computer generated photos. In addition, the "study" admits that the results were underestimated because 40 respondents out of 390 (10%) indicated that "none of the photographs depicted a use level that would keep them from using the trail."

Further, on a scale of 1-9 in which 1 is perceived to be not at all crowded and 9 is perceived to be extremely crowded, 52% of those surveyed regarding the trail picked 1-3, and 67.7% picked 1-4. 60.5% of those surveyed regarding the base of Yosemite Falls picked 1-3 and 77.2% picked 1-4.

Americans with Disabilities Act:

The level of access for the mobility impaired should be seen as a continuum. Some of us cannot climb Half Dome, but we do not ask for steps to be carved into it, and if we asked, it would be inappropriate for this to be done. The desirability of providing access must be tempered by the need to protect natural resources. The desirability of making facilities handicapped accessible appears to be being used as an excuse for a needlessly elaborate project. In fact,

the former Chief Ranger of Yosemite National Park who was on the walk-through indicated that the trail had already been restructured at the approach to the Lower Falls bridge years ago to help facilitate wheelchair access. So the issue appears not to be whether handicapped accessibility should be available, because it already is; the question should be to what standard should it be developed in this particular area. We have heard no discussion of this.

Restoration of areas to natural conditions:

The Valley Plan indicates that the western trail would be widened to 16' -- a veritable road! This would necessitate destroying numbers of black oaks which now bend gracefully along the path. This is only one of the impacts of this project which is not disclosed in the Valley Plan or anywhere else.

The basic configuration of the loop trail with the more direct, shorter western main trail leading to the Lower Falls and the longer, quiet, contemplative experience of the eastern trail meandering to the Lower Falls should be maintained. The eastern trail provides a unique opportunity for the visitor experience in the Valley which should not be destroyed but would be by this plan.

The Valley Plan indicates that the human-constructed rock rubble pile in the Yosemite Creek drainage near the Lower Falls bridge, which interferes with the hydrological processes of free flow, flood regime and the western branch of Yosemite Creek, will be removed as a part of the Lower Yosemite Falls project. However, Chip Jenkins and Bob Hansen indicated to those of us on the walk-through that it has been decided not to remove these rocks, thus dropping the only truly environmentally beneficial aspect to this plan.

The planned location of the new shuttle stop will also negatively impinge on the quiet experience of the eastern trail, as the noise of the diesel buses will be heard from the "quiet" trail.

The construction impacts of the large, overdone project are many. One which is disclosed in the Yosemite Valley plan is that the construction will cause 4.57 Tons of PM10 per year. This is a significant impact and air pollution burden both for Park visitors, for the resident wildlife and plants in the area as well as deposition into the braided stream tributaries which lead to the Merced River. This is not acceptable.

All of the following need to be fully considered and evaluated through a legally compliant NEPA process: The need for and purpose of this project; impacts on air pollution, noise, soils, aesthetics, and visitor experience; failure to protect Outstandingly Remarkable Values within the Merced River corridor such as hydrologic processes, in particular free flow, allowing Yosemite Creek to meander, non-interference with the flood regime; effects on wildlife, black bears and bats in particular; effects on plants; effects on the possibility of restoration of species which have been extirpated from the Valley; effects on Species of Concern and Threatened or Endangered Species; impacts on wildlife corridors; and impacts on cultural resources, in particular protection of archaeological sites and the ongoing traditional Native American uses.

The inadequate mention of the changes and plans for the Lower Yosemite Falls project and their impacts in the Yosemite Valley Plan do not fulfill the NEPA obligation for public scoping, disclosure of impacts on the environment and public input to and comment on the plan.

There is a serious problem of inadequate disclosure of the project content and impacts at this time. The Valley Plan resulted in a very sketchy and inadequate disclosure of the Lower Yosemite Falls project. The few widely scattered, and inadequately described references to the planning for the Lower Yosemite Falls area interspersed throughout the voluminous plan made it virtually impossible for the public have adequate knowledge and input regarding this plan. The Index is of no value in attempting to find references to the Falls Project in the Valley Plan documents. The general public would have been hard pressed to figure out what the project consists of.

We look forward to commenting on scoping and on a draft EIS for the Lower Falls area.

Sincerely yours,

George Whitmore Chair, Sierra Club Yosemite Committee