



Final

YOSEMITE VALLEY PLAN

*Supplemental
Environmental
Impact
Statement*

volume III

*Public Comments
and Responses*



National Park Service
Yosemite National Park
California

United States Department
of the Interior

Final

YOSEMITE VALLEY PLAN

*Supplemental Environmental
Impact Statement*



Volume III



November 2000

National Park Service
Yosemite National Park
California 95389
(209) 372-0201

Yosemite National Park • California
United States Department of the Interior



Scot Miller

The cover photographs for all volumes of this document were taken by nature and scenic photographer Scot Miller. Since his first visit to Yosemite in 1990, Miller has tried to capture the magnificence and grandeur of the park. Through his photography he hopes to inspire others to have an appreciation and understanding of Yosemite's uniqueness, along with its value as a national treasure worth preserving for future generations. He currently lives in Carrollton, Texas.



Lawrence Ormsby

The illustrations in this document were drawn in pencil and pen and ink by Lawrence Ormsby, partner in Ormsby and Thickstun Interpretive Design. For more than two decades, Ormsby has worked with National Park Service interpreters and historians to prepare illustrations for interpretive publications and exhibits. This year he received the National Park Service Director's Award for his illustration and cartography work in *A Land in Motion: California's San Andreas Fault*. He currently lives in Cave Creek, Arizona.

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Cover photos by Scot Miller

flooded old-growth meadow in Spring (front cover)
El Capitan and Yosemite Valley (back cover)



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Yosemite Valley Plan/SEIS

Yosemite National Park

Comment Analysis Provided by:
USDA Forest Service Content Analysis Enterprise Team

Comment Responses Provided by:
US Department of the Interior, National Park Service
Yosemite National Park

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Introduction

The Role of Public Comment

Solicitation of public comment on draft plans for major National Park Service actions is required under the National Environmental Policy Act (NEPA). Further, the National Park Service must “assess and consider [the resulting public] comments both individually and collectively.” Most importantly, such comments are viewed by the National Park Service as critical in helping park managers to shape responsible plans for our national parks that best meet the Service’s mission, the goals of NEPA, and the interests of the American public. During the formal comment period the public can review and comment on a draft plan’s alternative proposals for achieving stated park goals. (The comment period described here is part of a broader effort of public involvement and agency consultation fully described in Volume IB, Chapter 5, Consultation and Coordination.) The comments received are analyzed and the results considered by park management while developing the *Final Yosemite Valley Plan/SEIS*. For a more complete discussion of how the National Park Service addresses public comments, see “Considering Different Types of Comments under the National Environmental Policy Act” in Chapter 1 of this Volume.

What is the Response to Public Comments?

This volume of the *Final Yosemite Valley Plan/Supplemental Environmental Impact Statement (Final Yosemite Valley Plan/SEIS)* describes the process used to “assess and consider” the public comments received (from March 28, 2000, through July 14, 2000) on the *Draft Yosemite Valley Plan/Supplemental Environmental Impact Statement (Draft Yosemite Valley Plan/SEIS)*. This volume also presents the public concerns identified, and provides responses to each concern by Yosemite staff. Each public concern statement is accompanied by quotes, taken directly from public comment letters, that support the concern and provide context for the staff response. Also included are chapters presenting other results of the analysis of public comment that help the reader understand the public’s response and a description of the analytical process.

Background

In the fall of 1998, Yosemite National Park in conjunction with the Secretary of the Interior, decided to consolidate four Yosemite Valley planning efforts into one comprehensive plan. Those four efforts had generated five draft plans: the 1992 *Draft Yosemite Valley Housing Plan/Supplemental Environmental Impact Statement*, the 1996 *Addendum to the 1992 Draft Yosemite Valley Housing Plan SEIS*, the 1997 *Draft Yosemite Lodge Design Concept Plan/Environmental Assessment*, the 1997 *Draft Yosemite Valley Implementation Plan/Supplemental Environmental Impact Statement*, and the *Administrative Review Draft Lower Yosemite Fall Corridor Project/Environmental Assessment*.

All of these earlier draft plans were to be brought together into a new plan, the *Draft Yosemite Valley Plan/SEIS*. This new effort clearly required a reconsideration and consolidation of previous public input. Altogether, four public review and comment periods were held on these earlier draft plans over a seven-year period. In chronological order, and with open periods for public comment listed in parentheses, they were: the 1992 *Draft Yosemite Housing Plan/SEIS*

(8/92–9/92); the 1996 *Addendum to the Draft Yosemite Valley Housing Plan/SEIS* (12/6/96–4/1/97); the *Yosemite Lodge Design Concept Plan/Environmental Assessment* (4/10/97–5/16/97); and the *Draft Yosemite Valley Implementation Plan/SEIS* (11/27/97–2/23/98). As an administrative draft, the Lower Yosemite Fall Project had not reached the point of being released for public review. Taken individually, each of the three planning efforts released to the public for review and comment received significant attention. Altogether, and including scoping for the *Draft Yosemite Valley Plan/SEIS*, over 4,000 people had offered comments on the future management of Yosemite Valley during that period of planning.

Before the comprehensive *Yosemite Valley Plan* was started, public input on the four earlier documents released for public review had already helped advance planning for Yosemite Valley considerably. As each draft plan was completed, comments were analyzed relative to that plan and used to help rethink and refine the criteria for making planning decisions in Yosemite Valley. However, in earlier analyses of public input, National Park Service staff generally identified public comments relative to the project at hand, plan by plan. For example, comments about regional or parkwide transportation issues made as part of a response to the *Yosemite Lodge Plan* may not have been analyzed. This narrow focus of analysis also was used in the initial analysis of scoping comments on the *Yosemite Valley Plan*. Therefore, to capture and carry forward all comments relevant to the preparation of the *Draft Yosemite Valley Plan/SEIS*, the National Park Service undertook the rereading and analysis of all 6,468 letters, faxes, petitions, comment forms, and emails that were received between 1992 and 1999 in formal response to those three earlier plans and during scoping for the *Draft Yosemite Valley Plan/SEIS*.

This new analysis built on earlier analyses of public comment in response to each of the Yosemite Valley plans mentioned above. However, it differed significantly from those analyses in its comprehensive nature. Previously, National Park Service staff considered comments that pertained broadly to the planning process, raised a pertinent issue not raised before, or identified new information relevant to the planning process. The new analysis considered all comments whether general or specific, raised previously or new. The narrative summary of that analysis (U.S. Forest Service, Content Analysis Enterprise Team (CAET) 1999; *Summary of Public Comment, Yosemite Valley Planning, 1992-1999*) was a key tool used by Yosemite staff to ensure that the *Draft Yosemite Valley Plan/SEIS* addressed the full range of public comment. Incorporating the bulk of that report, Volume III of the *Draft Yosemite Valley Plan/SEIS* documents the analysis and response to public comment for that earlier planning (NPS 2000b).

After the analysis of this earlier public comment and during preparation of the *Draft Yosemite Valley Plan/SEIS*, the *Draft Merced Wild and Scenic River Comprehensive Management Plan/Environmental Impact Statement* (*Draft Merced River Plan/EIS*; NPS 2000a) was released for public review and comment. The Forest Service Content Analysis Enterprise Team (CAET) also analyzed the public comment on the *Draft Merced River Plan/EIS*, which was documented in a summary report (USFS 2000a) and in Appendix I of the *Merced Wild and Scenic River Comprehensive Management Plan/Final Environmental Impact Statement* (*Merced River Plan/FEIS*; NPS 2000c). The CAET staff provided Yosemite staff with an additional report, *Summary of Public Concerns Related to Yosemite Valley Planning From Public Comments on the Draft Merced Wild and Scenic River Plan/Environmental Impact Statement* (USFS 2000b). The public concern statements identified in this report were included in the deliberation process for the *Final Yosemite Valley Plan/SEIS* and are also presented in Chapter 5 of this Volume, along with responses by National Park Service staff. Concerns originating from public comments



on the Draft Merced River Plan/EIS are numbered 1001 to 1178 to distinguish them from those derived from comments on the Draft Yosemite Valley Plan/SEIS.

The Analysis of Public Comment on the Draft Yosemite Valley Plan/SEIS

All letters, e-mails, faxes, comment forms, and transcripts of public hearing testimony received as comment on the *Draft Yosemite Valley Plan/SEIS* were read and analyzed by the U.S. Department of Agriculture, U.S. Forest Service Content Analysis Enterprise Team (a branch of the U.S. Forest Service Washington Office Ecosystem Management Staff) using a process they developed, called “content analysis,” for comprehensively analyzing the content of public comment on a proposed plan or project. Over the last five years the Content Analysis Enterprise Team has used this process for analyzing public comment from several important planning efforts, including the *Glacier National Park General Management Plan* revision, and the *Interior Columbia Basin Ecosystem Management Plan*. For Yosemite National Park, the Comment Analysis Enterprise Team has analyzed the scoping comments for the *Merced River Plan/FEIS*, reanalyzed public comments received on four draft plans for Yosemite Valley that led to the development of the *Draft Yosemite Valley Plan/SEIS*, and analyzed public comment on the *Draft Merced River Plan/Environmental Impact Statement* (USFS 1999a, USFS 1999b, and USFS 2000a, respectively).

This analytical process comprises three main components: a coding structure and process, a comment database, and this narrative summary. Initially, a coding structure is developed to help sort comments into logical groups by topics. The topical coding structure was derived from an analysis of the range of topics covered in relevant present and past planning documents, legal guidance, and letters received from the public. Use of these codes allows for quick access to comments in the database on specific topics. The coding structure was inclusive rather than restrictive in order to sufficiently capture all comments.

The second phase of the analysis involved reading each piece of correspondence and assigning codes to statements made by members of the public in their letters, faxes, and emails. Each letter was divided into discrete comments that were each assigned a code. Codes were assigned by one staff person, validated by another, and each discrete comment was entered as a verbatim quote, with its assigned code, into the comment database.

The third phase included identifying statements of public concern and preparing the narrative summary. Public concerns were derived directly from letters and through a review of the comment database. Each public concern presents, in a simple statement, a common theme found in the body of public comment. The public concern statement is worded to capture the action the public feels the National Park Service should undertake and provides decision-makers with a clear sense of actions the public is requesting. Concern statements are not intended to replace actual comment letters or sample quotes. Rather, they can help guide the reader to comments on the specific topic in which they are interested.

During the process of identifying concerns, all comments were treated equally—they were not weighted by organizational affiliation or other status of respondents, and it did not matter if an idea was expressed by thousands of people or a single person. Emphasis is on the content of a comment rather than who wrote it or the number of people who agree with it. All public concerns identified by the Comment Analysis Enterprise Team are included in this volume, whether supported by the comments of one person or many people. The process is not one of counting

votes and no effort was made to tabulate the number of people for or against a certain aspect of the *Draft Yosemite Valley Plan/SEIS*. There are many reasons for this, the primary one being a desire to prepare the *Final Yosemite Valley Plan/SEIS* in a way that meets the mission of the National Park Service and best serves all the people—not just some.

Table III.I.1 presents three parameters that give a general picture of the scope of public response to the *Draft Yosemite Valley Plan/SEIS*. Because many people commented more than once, the number of signatures, though probably close, does not reflect the actual number of people submitting comments.

Table III.I.1—Number of Responses, Signatures, and Comments Received During Public Comment Period for Yosemite Valley Plan
Summary of Public Comment, Yosemite Valley Plan

Number of Responses	Number of Signatures	Number of Comments
10,240	17,498	23,565

Content analysis of this body of comment identified 693 public concerns that are presented in Chapters 2, 3, and 4 of this volume. Additionally, 178 public concern statements derived from the *Draft Merced River Plan/EIS* public comment process and related to the *Draft Yosemite Valley Plan/SEIS* were identified. These concerns from the Merced River planning process are presented in Chapter 5 of this volume, with National Park Service staff responses. As already mentioned, these latter concerns were also included in the deliberations leading to the *Final Yosemite Valley Plan/SEIS*.

Although these numbers give a general sense of public comment, they should be interpreted with caution—the analysis process used attempts to capture the full range of public comments, but those who responded do not constitute a valid random or representative sample of the general public. Thus, although this information can provide insight into the perspectives and values of the respondents, it does not necessarily reveal the desires of society as a whole.

A more detailed description of the Content Analysis Process is provided in Chapter 8 of this volume. For more information, the reader should refer to the original comment letters for the *Draft Yosemite Valley Plan/SEIS*, the CAET *Summary of Public Comment* (USFS 2000c), and database reports, all available in the Yosemite Research Library (write to: National Park Service, P.O. Box 577, Yosemite National Park, California 95389).

How to Use this Document

Generally, this Public Comments and Responses volume is divided into this Introduction; Chapter 1, which describes how public concerns were used in preparing the *Final Yosemite Valley Plan/SEIS*; Chapters 2-5, which present public concerns (each identified by a unique number, assigned when it is first entered into the database) and supporting quotes with National Park Service responses; and Chapters 6-8, which summarize other aspects of the analysis. Chapters 2-4 (with National Park Service responses added) and 6-8 are adapted from the CAET report, *Summary of Public Comment: Yosemite Valley Plan/Draft Environmental Impact Statement* (USFS 2000c). Chapter 5 (with National Park Service responses added) is based on the CAET report, *Summary of Public Concerns Related to Yosemite Valley Planning, From Comment on the Merced Wild and Scenic River Plan* (USFS 2000b).



Chapter Descriptions

CHAPTER 1 provides an overview of the different categories of public comments, as defined by the National Environmental Policy Act, and how each type of comment affects the staff response, describes how public concerns were screened by Yosemite staff in preparation for consideration by park management, outlines the thirty-three topical issues which were defined by public concerns, and briefly describes park management's deliberation on those issues that led to modification of the *Draft Yosemite Valley Plan/SEIS* and the shaping of the Preferred Alternative in the *Final Yosemite Valley Plan/SEIS*.

CHAPTER 2 includes public concerns, supporting quotes, and staff responses on general themes regarding the purpose of Yosemite National Park, the mission of the National Park Service, the purpose and need for action, relationships between different planning efforts inside and outside the park, public involvement, compliance with land management laws, and funding for implementing plans.

CHAPTER 3 presents public concerns, supporting quotes, and staff responses relating specifically to different draft plan alternatives.

CHAPTER 4 covers concerns and responses on specific topics organized by potentially affected resource or environmental consequence and includes sections on natural resources, cultural resources, transportation, access issues, recreation, visitor services, housing and park administration, and the socioeconomic effects of park planning.

Chapters 2, 3, and 4 each begin with a general introduction followed by sections and subsections on more specific topics. At both the section and subsection levels, public sentiments on the relevant topic are summarized in a brief narrative, followed by one or more statements of public concern. Note that, because all public concerns are presented, concern statements may offer contradictory direction to the National Park Service. Each public concern statement, or sometimes a group of related statements, is followed by an explanation of how the National Park Service dealt with that comment in the *Final Yosemite Valley Plan/SEIS* or why the comment was not dealt with in the plan. Sometimes the reader will be directed to a section of the *Final Yosemite Valley Plan/SEIS* where the actual response or modification can be found. Sometimes there is a reference to the response to another concern that provides related information. The Index to Public Concern Statements at the front of the Volume can help find the reference.

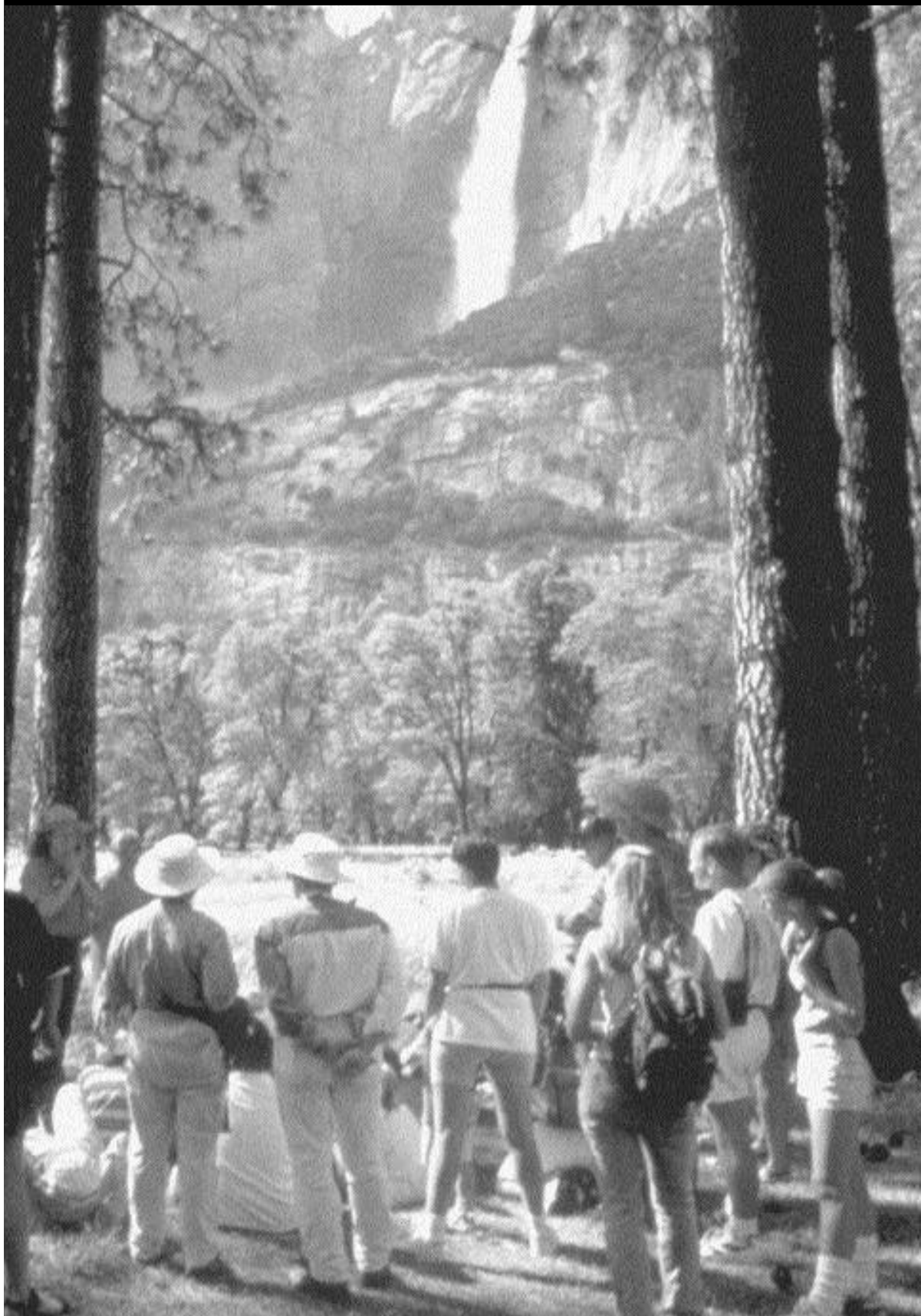
CHAPTER 5 lists public concerns and supporting quotes relating to Yosemite Valley planning derived from analysis of public comment on the *Draft Merced River Plan/EIS*, with National Park Service staff responses. This chapter does not include the narrative introduction to each section as found in Chapters 2, 3, and 4, but the sections are arranged according to the same topical outline for ease of reference.

CHAPTER 6 briefly discusses Response Demographics of the public comment.

CHAPTER 7 presents an overview of Organized Response Campaigns that resulted in form letters or petitions.

CHAPTER 8 briefly describes the Content Analysis Process and includes a list of the CAET and Yosemite staff involved in the analysis of public comments.

*Public Concerns
and
Modification
of the
Draft Plan*



Final
Yosemite
Valley
Plan

Supplemental EIS

Chapter 1 ~ Public Concerns And Modification Of The Draft Plan

Considering Different Types of Comments under the National Environmental Policy Act

Agencies have a responsibility, under the National Environmental Policy Act (NEPA), to first “assess and consider comments both individually and collectively” and then to “respond..., stating its response in the final statement.” The content analysis process used by the U.S. Forest Service Content Analysis Enterprise Team (CAET) documented here and in their report, *Summary of Public Comment: Yosemite Valley Plan Draft Supplemental Environmental Impact Statement* (USFS 2000c), considers all comments received “individually and collectively” and equally, not weighting them by the number received or by organizational affiliation or other status of the respondent. However, beside the public concern statements developed by the Comment Analysis Enterprise Team, comment letters are considered in several different ways by park staff.

Public concern statements and supporting quotes form the basic summary of public comment and are the primary focus of park management when considering public comment collectively. These statements are formulated by reading each individual letter, coding each identifiably different concern in each letter to a topical database, and then using that database to identify the range of public concerns in the whole body of public comments. This process treats all comments equally.

Demographic information gathered from responses is another way of looking at comment letters collectively, allowing park planners to obtain a picture of certain general aspects of the responding public, like the geographic distribution of commenters, their affiliation with a government agency or private organization, and how different members of the public chose to offer their comments (e.g., by letter, fax, email, public testimony, etc.).

Finally, park managers and planners are informed by the Comment Analysis Enterprise Team of all letters from government agencies and American Indian Tribes, from nongovernmental organizations (NGOs), and of particularly informative and well-written letters from individuals. The National Environmental Protection Act mandates that managers consider (and print in the final document) all letters received from the first two types of commenters (see Volume IB, Chapter 5, Consultation and Coordination, for copies of these letters). On the other hand, nongovernmental organizations typically represent a number of people, often with pertinent perspectives on one or more aspects of planning for Yosemite National Park and their letters are of interest to managers in making decisions.

Public concern statements coded by subject and demographic information may be used in combination by park planners and managers to seek a clearer picture of certain issues, such as what range of issues particular groups are commenting on or, conversely, what different groups are commenting on a particular issue, such as camping. All of these methods together are used to ensure that the National Park Service assesses and considers public comments “both individually and collectively.”

The National Environmental Protection Act requires that after the National Park Service considers comments, they respond to those comments. However, the type of response depends on the type of concern identified.

Comments, or the concerns identified from them, are typically classified as those that fall within the scope of decision making for the plan in question and those that fall outside that scope for any number of reasons. Counsel on Environmental Quality regulations define “scope” and require the National Park Service to explain why comments are determined to be out of scope. Generally, the scope of a plan is the range of connected, cumulative, or similar actions, the alternatives and mitigation measures, and the direct, indirect, and cumulative impacts to be considered in the environmental impact statement.

If a concern was considered out of scope, the explanation of why is provided by the staff response to it in Chapter 2, 3, 4, or 5. Generally, the types of comments received, and concerns identified, that are considered out of scope include those that:

- Do not address the purpose, need, or goals of the *Yosemite Valley Plan* (e.g., propose an action in areas of the park beyond Yosemite Valley or that are not directly related to an action proposed in the plan, or relate to day-to-day operational issues such as law enforcement procedures or road maintenance)
- Address issues or concerns that are already decided by law or national policy
- Suggest an action not appropriate for the current level of planning (e.g., architectural character of a building, which is a design level consideration)
- Propose untenable restrictions on management of the park or conflict with approved plans not being revised by the *Yosemite Valley Plan*
- Did not consider reasonable and foreseeable negative consequences
- Point to only minor editorial corrections

Comments within the scope of the plan are typically classed as either substantive or nonsubstantive. As defined in the National Park Service’s NEPA guidance (Director’s Order #12) and based on Council of Environmental Quality regulations, a substantive comment is one that:

- Questions, with reasonable basis, the accuracy of the information in the environmental impact statement
- Questions, with reasonable basis, the adequacy of environmental analysis
- Presents reasonable alternatives other than those presented in the environmental impact statement
- Causes changes or revisions in the proposal

Nonsubstantive comments include those that simply state a position in favor of or against the proposed alternative, merely agree or disagree with National Park Service policy, or otherwise express an unsupported personal preference or opinion. Although a commenter’s personal opinions on a subject may influence the development of the final plan, they generally would not affect the impact analysis.



The agency is required to respond only to substantive comments. However, to fully inform the public, Yosemite management has asked planning staff to respond to all public concerns identified during content analysis, within and out of scope, substantive and nonsubstantive alike. Responses to out of scope concerns are typically restricted to describing why it is out of scope and does not merit further consideration, although a more elaborate answer may be provided. Responses to substantive concerns are typically more extensive and complete and, more importantly, often result in changes to the text of the final environmental impact statement, for purposes of clarification, if nothing else. Reference to the part(s) of the final document influenced by a concern may constitute or supplement the response. If several concerns are very similar, they may be grouped, with a single answer for the group.

Screening Public Concerns – Identifying Planning Issues

Overview

For the *Draft Yosemite Valley Plan/Supplemental Environmental Impact Statement (Draft Yosemite Valley Plan/SEIS)*, an extensive process of screening public concerns and identifying planning issues was undertaken. This process involved methodically: 1) categorizing the public concern statements and supporting quotes received in regular updates from the U.S. Forest Service Content Analysis Enterprise Team; 2) sorting them based on whether they needed to be reviewed by management or could be sent directly to staff for a response; 3) identifying issues raised by the concerns; then 4) organizing and tracking those concerns, based on the sorting criteria, through regular reports to the Yosemite staff responding to comments and the park management review team. This process, described in detail below, was used to effectively manage and respond to the 693 public concerns derived from the 10,240 public comments received on the *Draft Yosemite Valley Plan/SEIS*, and the 178 public concerns related to Yosemite Valley planning derived from the analysis of public comment on the *Draft Merced Wild and Scenic River Comprehensive Management Plan/Environmental Impact Statement (Draft Merced River Plan/EIS)* so as to ensure that the *Final Yosemite Valley Plan/SEIS* addressed the full scope of public comment.

Groups Working on the Process of Screening and Responding to Public Comments

U.S. Forest Service Content Analysis Enterprise Team (CAET)—Based in Missoula, Montana, the CAET was responsible for coding and analyzing all public comment on the *Draft Yosemite Valley Plan/SEIS*. All comments were received by Yosemite National Park staff, logged, copied, and then forwarded to the Comment Analysis Enterprise Team. Responses were in the form of letters, email, faxes, comment forms, and statements recorded at public hearings. Between the beginning of May and July 24, 2000, the Comment Analysis Enterprise Team regularly produced and delivered three comment analysis products to Yosemite for use by the National Park Service and consultant staff: 1) Immediate Attention Reports (weekly); 2) Information Request Reports (weekly); and 3) the Public Concern Database (weekly until July 5, 2000, then daily through July 12, 2000, then weekly through July 24, 2000). As described in Chapter 8 of this volume, Yosemite planning staff worked in Missoula assisting the Comment Analysis Enterprise Team with comment analysis between June 26 and July 21, 2000. Additional comments were read and analyzed the week of August 21, 2000 (see Volume IB, Chapter 5, Consultation and Coordination).

Concern Screening Coordinating Group—This group included Yosemite National Park planning staff and the park’s primary consultant assisting with preparation of the *Draft* and *Final Yosemite Valley Plan/SEIS*. This team was responsible for categorizing and sorting concerns based on the type of response needed, whether or not they could be sent to the Comment Response Team (see below) without further delay or raised a planning issue they identified as needing to be reviewed by the Management Team (see below).

Comment Response Team—Yosemite National Park and consultant subject matter experts worked in this group and were responsible for writing the responses to all public concern statements.

Management Team—This group included the Yosemite National Park Superintendent, Deputy Superintendent, Division Chiefs, the Western Regional Director, a Department of Interior solicitor, a representative from the Secretary of the Interior’s office, and primary project managers for the *Draft* and *Final Yosemite Valley Plan/SEIS*. They were responsible for investigating, discussing, and making decisions about issues raised during public involvement and agency consultation that might require a change in plan direction or significant further analysis while preparing the *Final Yosemite Valley Plan/SEIS*.

Final Yosemite Valley Plan/SEIS Production Team—This group included National Park Service and consultant staff responsible for taking finished staff responses and text edits and incorporating them into the *Final Yosemite Valley Plan/SEIS*.

Public Comment Processing

Receipt of Comments—Yosemite National Park staff received all comments, including letters, email, faxes, and comment forms. Each was stamped with a received date, given a unique number, and pertinent data entered into a log. Copies were made and the original was forwarded to the Comment Analysis Enterprise Team for analysis. One set of copies was kept for use at Yosemite and one set sent to park contractors for processing information requests. Comments received at open houses and transcripts of public hearing testimony were numbered, logged, and copied by Yosemite staff and mailed immediately after each public meeting, directly to the Comment Analysis Enterprise Team and park contractors.

Coding Comments—The Comment Analysis Enterprise Team received letters from Yosemite and read and coded them according to the categories listed on their coding structure. They entered this information into a master database. From this database, three separate databases were created for the following items: Public Concern Statements, Immediate Attention Items, and Information Requests. The screening and tracking process for Immediate Attention Items, Information Requests, and Public Concern Statements each followed a different process, described below. For a more complete description of the CAET content analysis process, see Chapter 8 of this volume.

Responding to Information Requests and Immediate Attention Letters—The Comment Analysis Enterprise Team sent weekly reports to Yosemite and park contractors identifying letters with a request that seemed to require a response from Yosemite. Park contractors screened these “Information Request Reports” to determine if, from the perspective of the National Environmental Policy Act, a response was actually needed, and if so, what type of response. This information was then passed on to Yosemite staff for an appropriate response. Most of these



requests were for copies of the *Draft Yosemite Valley Plan/SEIS* or to be added or removed from the park's planning mailing list. A few required a more elaborate response.

Using criteria supplied by the National Park Service, the Comment Analysis Enterprise Team identified, in weekly "Immediate Attention Reports," letters needing to be seen quickly by park staff. Using these reports, letters falling in this category were pulled from the reference file, copied, placed in binders by type, and presented to the management team for review and reference. The types of letters identified in the Immediate Attention Report include:

- A notice of appeal or litigation, or a threat of harm
- A Freedom of Information Act request
- A proposal for a new alternative
- An excellent review of an issue, or one that was particularly informative and well written
- From a government entity (federal, tribal, state, county, city elected official or agency)
- Requests for an extension of the public comment period
- Comments on the compliance and or compatibility between the *Draft Merced River Plan/EIS* and the *Draft Yosemite Valley Plan/SEIS*
- Complaints or concerns about the cost, size, or receipt of the *Draft Yosemite Valley Plan/SEIS*
- From a nongovernmental organization (defined broadly)

Public Concern Statement Screening—Using the criteria described below for each of the four screening levels (screens #1, #2/3, #4 and #6), concerns were classified to direct them to the appropriate team for response or deliberation. Information regarding the classification and assignment of each concern was entered into a database for tracking.

Screen #1 identified concerns that were out of the scope of the *Draft Yosemite Valley Plan/SEIS* planning process, or were nonsubstantive, and therefore did not warrant further consideration. These concerns were then sent to the Comment Response Team without further delay for a simple response. Any concern for which an affirmative answer could be given to one of the following questions falls in this category:

- Is the concern outside the scope of the proposed action?
- Is the concern already decided by law or policy?
- Is this the wrong planning level for a decision on this concern?
- Would acting on the concern place untenable restrictions on management, conflict with approved plans, or entail reasonable and foreseeable negative consequences?
- Is the concern a simple editorial correction?
- Is the concern an unsupported personal opinion? (A nonsubstantive concern)

Concerns not matching any of the above criteria are within the scope of the *Draft Yosemite Valley Plan/SEIS*, possibly substantive, and were passed on to screen #2/3.

Screen #2/3 again determined, in part, if the concern and supporting quotes could go to the Comment Response Team without further delay. These concerns required simple technical or textual edits, or demanded more complex responses and extensive clarification, meaning larger sections of the plan needed to be rewritten. However, changes stemming from these concerns would not require a change in plan direction. Screen #6 was applied at this stage of the screening process, meaning that if a screen #2/3 concern related to one or more of the topical issues areas needing review by management, it was identified in the database as also needing to be directed to the management team, to provide context for their consideration of the screen #4 concerns in that related issue area (see *Issue Development*, below).

Responding to concerns that did not fall out at Screen #2/3 required a possible change in plan direction or significant further analysis, and hence a decision by the Management Team. Such concerns were passed through Screen #4, Issue Development.

Issue Development—Screen #4 involved the evaluation of those concerns raising an issue that implied a change in plan direction. Although there were hundreds of concerns, it was soon clear that such concerns fell into a relatively small number of topical issue areas, many related to each other. Eventually, thirty-three topical issue areas were identified. As concern screening proceeded, each concern reaching this level was assigned to one or more of the topical issues areas. Most were assigned to several. Then, using the database of screened concerns, briefing reports were prepared for the Management Team for each topical area, consisting of all concern statements and their supporting quotes falling into that topical issue area. Also, as noted above, many of the Screen #2/3 concerns being passed directly to the Comment Response Team had some bearing on one or more of the topical areas, even though they could be responded to without causing a change in plan direction. These latter concerns were given a unique identifier (screen #6) in the concern database that caused them to be included as information items in the Issue Briefing Reports sent to the Management Team.

Concerns forwarded to the Comment Response Team for which they felt unable to prepare responses were returned to the Coordinating Group for further clarification and, if necessary, forwarded to the Management Team for review.

Comment Response—As they received the public concern statements that did not raise issues needing management review, the Comment Response Team began to identify the changes needing to be made to the text of the *Draft Yosemite Valley Plan/SEIS* and the location of these changes. They also began writing the responses that accompany each concern in this volume. After deliberation, the Management Team forwarded the concerns that generated issues, along with their decisions and planning directions, to the Comment Response Team and other technical staff for further analysis, revision of planned actions, reordering or rewriting the draft's alternatives, and writing specific responses for each concern statement. Summarizing briefly, there were five general types of National Park Service responses to public concerns:

- Simple text revisions and technical edits of the *Draft Yosemite Valley Plan/SEIS* for the *Final Yosemite Valley Plan/SEIS*
- Complex or extensive revision of text to more clearly explain goals, proposed actions, or environmental impacts analysis
- Revision of the plan's alternatives or impact analysis based on new ideas, information, or analysis

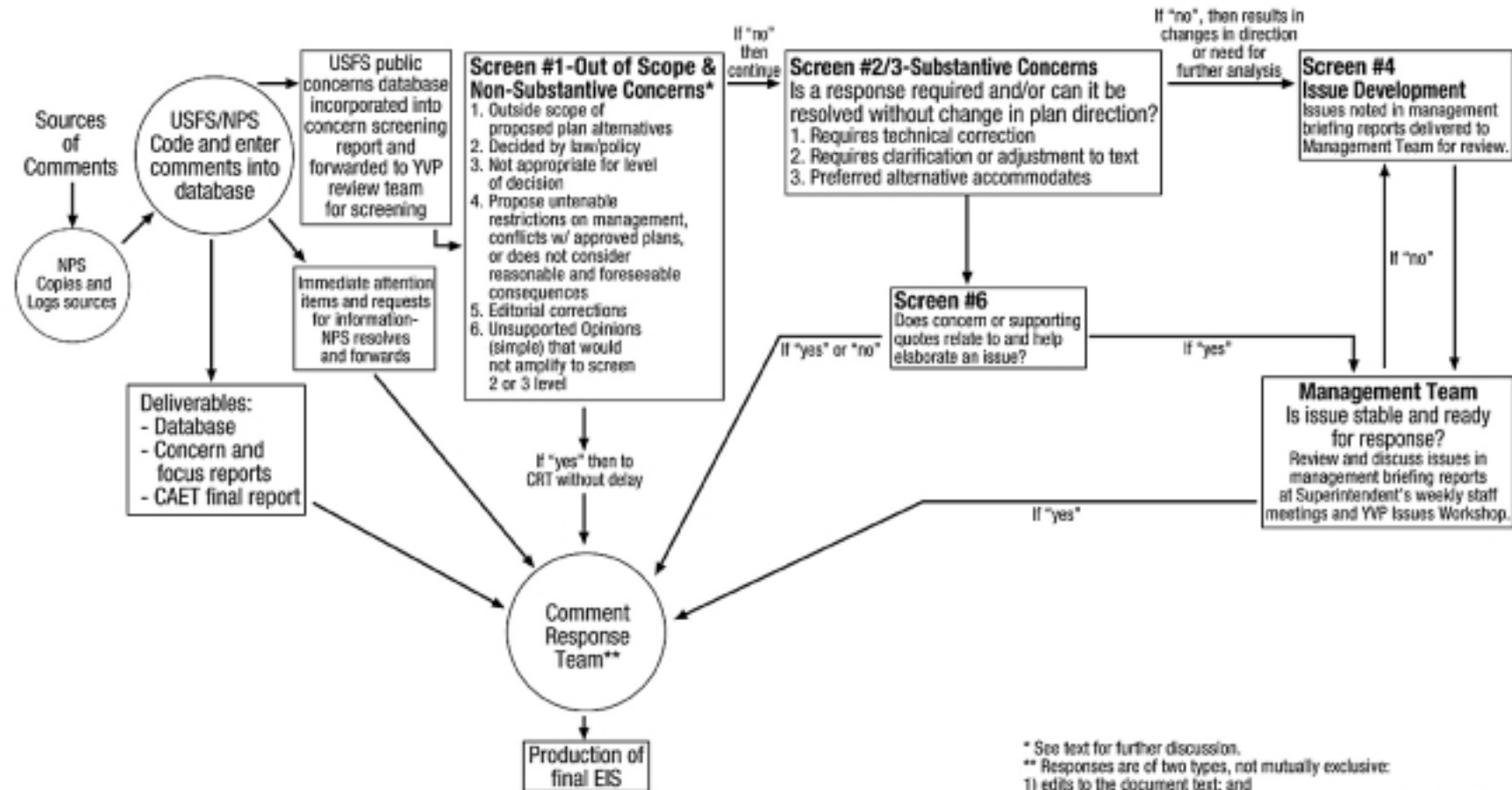


- The brief explanation, included in this volume, of how and why the National Park Service dealt with each public concern that was identified
- Responses to requests for documents or information compiled in the weekly Information Request Reports

Screening Schedule—Concern screening began in May 2000, around the middle of the comment period, as concern reports began to be received from the Comment Analysis Enterprise Team in Missoula. During the last week of the comment period, comment letters were being shipped daily by airfreight to Missoula. Conversely, concern reports were received electronically by the planning team each afternoon, screened, and topical concern reports prepared daily. This daily schedule continued through the end of the week after the close of the public comment period, and then was repeated on July 17 and 24 for the last two concern report updates from the Comment Analysis Enterprise Team. Further details on the use by management of the topical concern reports is outlined in the section **Management Deliberation on Issues**, below.

Diagram III.1.1 on the following page is a graphic depiction of the process used to identify and screen public concerns, and to identify issues for management deliberation and staff response.

Diagram III.1.1
Screening Process of Public Comments
Yosemite Valley Plan



* See text for further discussion.

** Responses are of two types, not mutually exclusive:

1) edits to the document text; and
 2) responses accompanying concern statements and supporting quotes and presented in Volume III of the Final YVP/SEIS.

Issues Identified from Public Concerns

The process of screening public concerns identified many that required decisions by park management about possible changes to the Preferred Alternative before staff could prepare responses. Such concern statements fell into thirty-three topical issue areas. Those concern statements and their supporting quotes, the input from consultation between park staff, government agencies, and Native American Tribes, and results from several additional impacts analyses were used by management in their deliberations while shaping the Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* (see Volume 1A, Chapter 2, Introduction). The thirty-three topical issue areas considered were:

- Air quality
- Alternative 2 (Preferred)
- Balance
- Bridges
- Camping
- Circulation
- Compliance
- Congestion
- Cost-benefit
- Development
- El Portal
- Equity
- Foresta
- Health and safety
- Historic
- Housing
- Lodging
- Merced River Plan/Yosemite Valley Plan timing
- No Action
- Noise
- Other Action Alternatives
- Parking
- Park/Community
- Park/County issues
- Regional transportation
- Shuttle buses
- Special populations
- Stock use
- Timing/Phasing
- Utilities
- Visitor experience
- Visitor services
- Visitor use

Each of the thirty-three issue areas is described briefly below. For a more complete understanding of each issue, refer to the concern statements, supporting quotes, and staff responses in the appropriate topical areas of Chapter 2, 3, 4, and 5 of this volume.

Air quality—Included here are concerns about the effects on air quality of various proposals, especially the use of diesel buses and moving employee housing out of Yosemite Valley, moving toward use of clean, alternative fuels or transportation modes, and the effect of diminished air quality on vegetation, wildlife, and humans.

Alternative 2—Comments specifically supporting or rejecting the Preferred Alternative as a whole or weighing in—positive, negative, or suggesting specific changes—on its various elements.

Balance—Concerns about the balance or lack of balance of the Preferred Alternative relative to such issues as resource protection and visitor experience, restoration and development, often with reference to timing (i.e., priority), cost, or the number of people believed to benefit from a proposed action.

Bridges—The proposed removal of four historic bridges in Yosemite Valley generated many comments, both pro and con, often with suggested alternatives to mitigate impacts.

Camping—Included here are comments about the number, location, and type of campgrounds, campground facilities, the role camping plays in the visitor's experience, and camping as an affordable form of overnight lodging.

Circulation—Comments about the circulation patterns, existing or desired, of vehicle roadways in Yosemite Valley and how proposed construction or closure of roads, parking lots, and bridges affect them.

Compliance—If someone questioned, directly or indirectly, the adequacy of the plan's impact analysis, range of alternatives, or some other aspect of its compliance with the National Environmental Policy Act or other relevant legislation, that concern was placed into this issue category.

Congestion—Concerns focusing on the perceived level of traffic congestion, or lack of congestion, in Yosemite Valley, its effect on visitor experience, how proposed actions would affect it, and suggestions about alternative actions to address it.

Cost-Benefit—Comments about the cost-benefit ratio from the perspective of the commenter, or specifically asking that a cost-benefit analysis be done for the different alternatives or a particular proposed action.

Development—The level of development in Yosemite Valley was the focus of many comments; there were calls for both more and less development, and a wide variety of sentiments were expressed about the appropriateness of the type, location, density, and design of existing and proposed development, its effects on natural and cultural resources and visitor experience, and how the development of Yosemite Valley relates to the mission of the National Park Service.

El Portal—Comments about existing conditions and proposed actions in the El Portal administrative site, their effects on the natural environment or community character, and suggestions to locate functions and infrastructure proposed to be removed from Yosemite Valley in, or somewhere besides, El Portal.

Equity—Two areas of concern were related to equity: 1) the affordability of overnight accommodations (camping and lodge, including Housekeeping Camp) and of a visit to Yosemite for all income groups; and 2) the accessibility of Yosemite Valley, its services and facilities, to all people, not any particular group or class of people.

Foresta—Comments about existing conditions and proposed actions in Foresta, their effects on the natural environment or community character, and suggestions to locate functions and infrastructure proposed to be removed from Yosemite Valley in, or somewhere besides, Foresta.

Health and Safety—This issue includes concerns about the positive or negative effects of existing conditions or proposed actions on human health and safety, including property.

Historic—Comments on the historic and cultural value of structures (apart from historic bridges), sites, districts, and landscapes in Yosemite Valley, their need for protection, and how proposed actions would protect or degrade their historic value.

Housing—Employee housing, as distinct from guest lodging, generated comments about the type and number of units to be provided in different locations in Yosemite Valley, other areas of Yosemite National Park (i.e., Wawona and Foresta), the El Portal Administrative Site, and surrounding communities outside the park.

Lodging—Comments were received on many aspects of guest lodging, including type, cost, and the mix of units of different type and cost, its location and the overall characteristic or experience provided by the lodging in that area, the appropriateness of these various factors based on whether the lodging is inside and outside of Yosemite Valley, and how these different factors influence the effect of lodging on natural and cultural resources and visitor experience.



Merced River Plan—Concerns on this issue were about the ability of the National Park Service and the public to evaluate the potential environmental impacts of the *Draft Yosemite Valley Plan/SEIS* without a completed *Merced Wild and Scenic River Comprehensive Management Plan (Merced River Plan)*, the relationship of certain actions, proposed or absent, to the *Merced River Plan*, and included requests to stop work on the *Draft Yosemite Valley Plan/SEIS* until the *Merced River Plan* was completed.

No Action—Comments about approving or disapproving the No Action alternative or opting for the status quo with respect to a proposed action or alternative element.

Noise—Gathered here were concerns about the noise generated by vehicles and activities and how proposed or suggested alternative actions might influence noise level and thus affect visitor experience or wildlife.

Other Alternatives—Comments, pro and con, about the action alternatives other than the Preferred Alternative (i.e., Alternatives 3, 4, and 5), in whole or in part.

Park/Community—Concerns important to some commenters, especially residents of Yosemite Valley, Wawona, Foresta, and El Portal, included the need for various community services and facilities and their relationship to community character and quality of life.

Park/County—Falling in this category are comments about proposed actions, or that suggest alternative actions, that would trigger or affect the relationship(s) between Yosemite National Park and one or more of its government agency (federal, state, or county) neighbors.

Parking—Any of the numerous concerns relating to the size, type, or location of parking and its suitability in a variety of locations in Yosemite Valley, outside the Valley, but inside Yosemite National Park, or outside the park, and how that parking would affect natural and cultural resources, visitor experience, and whether it supported the goals of the *Draft Yosemite Valley Plan/SEIS*).

Regional transportation—Comments in this area were about Yosemite Area Regional Transportation System, other nonpark supported public transportation services, including rail, commercial tour buses, and their impacts on natural and cultural resources and visitor experience.

Shuttle Buses—Comments about the buses that would transport park visitors between Yosemite Valley and out-of-Valley parking lots, and around the Valley, the kinds of facilities they should be equipped with, and how the operation of these buses might affect natural and cultural resources and visitor experience. Does not include comments on tour or regional transportation buses.

Special Populations—Comments about the needs of or the effects of proposed actions on people that are mobility-, sight-, or hearing-impaired, the elderly, ethnic minorities, families with young children, and other groups that may have special needs.

Stock use—Concerns in this category refer to commercial horseback rides, private stock use and facilities to support it, including trails, and their effects on natural and cultural resources and visitor experience.

Timing/Phasing—This issue includes comments about implementing the *Yosemite Valley Plan*, including prioritizing, funding, and scheduling actions; the need to identify which actions would require further compliance and public involvement; comments that suggest the need to take some action that is not proposed before implementing proposed actions, and comments that request an

extension of the public comment period or the date for release of the *Final Yosemite Valley Plan/SEIS* or Record of Decision.

Utilities—Water, sewer, electrical service and facilities; concerns about the condition and impacts of existing utilities, the effect of proposed actions on utilities, especially on capacities, and the effects of utilities, existing or proposed, on natural and cultural resources and visitor experience.

Visitor Experience—While concerns frequently identified effects on visitor experience from proposed actions affecting camping, lodging, picnic areas, trails, and transportation modes, as might be expected, commenters also made a connection between visitor experience and proposed actions influencing virtually every other issue area, including air quality, congestion, development, health and safety, historic resources, especially bridges, noise levels, stock use, visitor services, and visitor use.

Visitor Services—Comments on services other than camping, lodging, and transportation, such as retail and food service, the ice rink, swimming pools, commercial trail rides and rafting, and other recreation services, automotive services (including gasoline), and orientation and interpretive services.

Visitor Use—This issue area dealt with concerns about limiting access to Yosemite Valley or Yosemite National Park, including comments about specifically limiting vehicles or people, along with general references to carrying capacity and reservations systems.

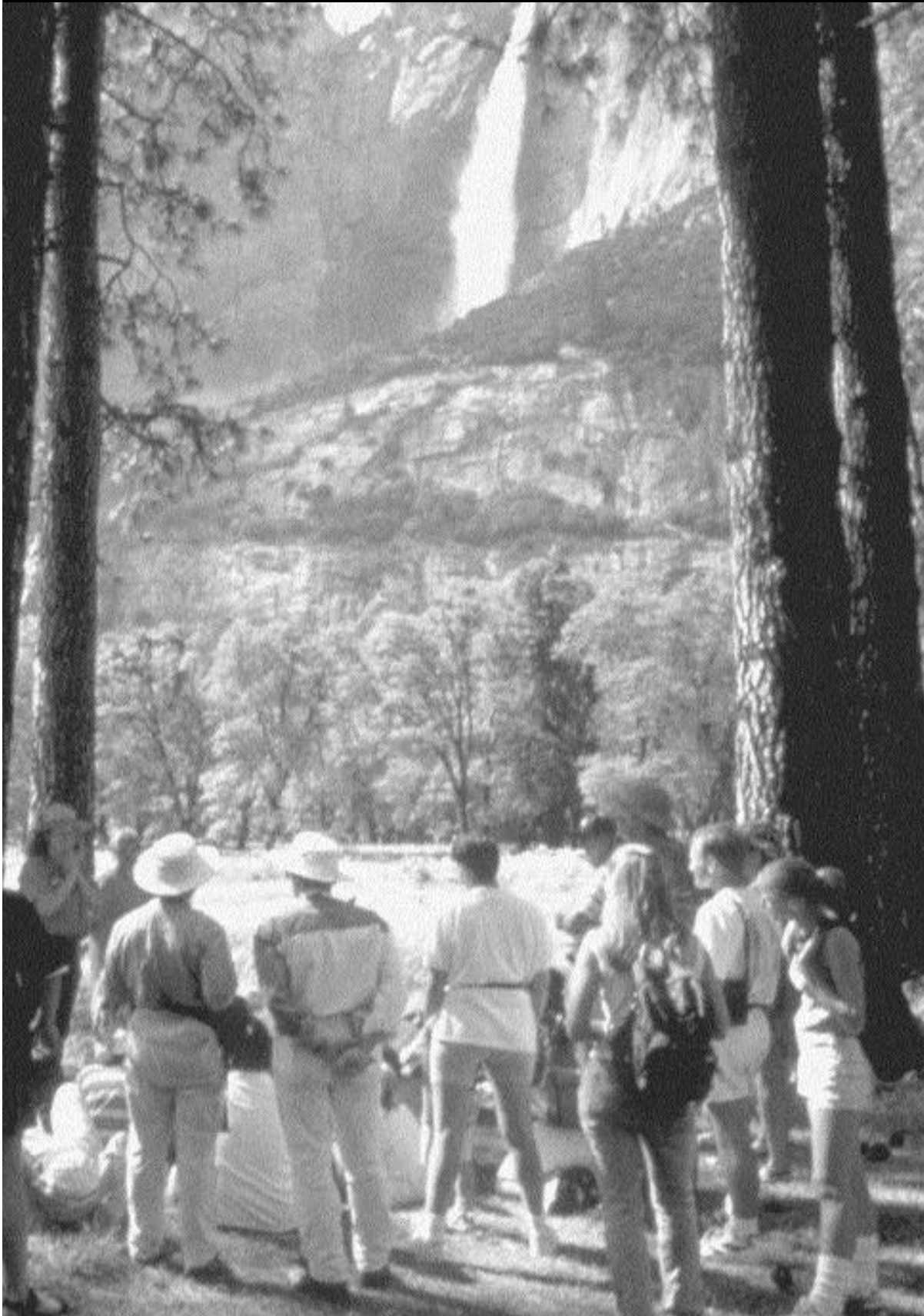
Management Deliberation on Issues

The vast majority of comments on the *Draft Yosemite Valley Plan/SEIS* were received the week ending July 7. The management team began to discuss and deliberate on concerns and issues raised in the public comment period in a weeklong facilitated workshop the week of July 10, 2000. During this workshop, public concern and issue reports were provided to management daily. This process of review, analysis, and discussion, while largely complete by early August, continued through to the beginning of September before all issues were resolved to the satisfaction of the Management Team and the final document turned over to the National Park Service consultant to prepare for printing.

Management deliberation included all aspects of the plan and all issues raised by public concerns. It also included input from consultation between park staff, government agencies, and Native American tribes. In many cases, staff was asked to undertake additional analysis to support these management discussions. There were a number of important changes made to the Preferred and other action alternatives presented in the *Draft Yosemite Valley Plan/SEIS* in preparing the *Final Yosemite Valley Plan/SEIS*. These changes are discussed at the beginning of Volume IA, Chapter 2.



*Purpose
and
Need*



Final
Yosemite
Valley
Plan

Supplemental EIS

Chapter 2 ~ Purpose and Need

The public comment covered in this chapter captures the general themes regarding the future management of Yosemite Valley. These broad concern areas are divided into seven sections: Purpose, Planning Process, Relationship to Other Planning Efforts, Applicable Laws, Implementation, Funding, and Public Participation and Coordination.

Section 2.1 ~ Purpose

Alternative views of how best to protect the natural splendor of Yosemite Valley while providing opportunities for people to enjoy that very beauty are presented in this section. Borrowing words from the National Park Service, many respondents feel that the *Yosemite Valley Plan* should promote the needs of future generations. “Many of us old timers will yearn for events and places that were never appropriate. But you must move past those things and conceive of a Yosemite Valley for our great-grandchildren,” encourages one person.

Numerous individuals believe that the *Yosemite Valley Plan* should emphasize resource protection over visitor experience. “Stand firm against the big money interests that are waiting outside the park with blueprints, machines, and cement trucks poised to decimate this natural wonder,” exhorts one respondent. “It is much more important to protect the quality of the park, and its wildlife, than to make it easier for tourists to park,” offers another person. “To say otherwise is laughable.” One citizen believes that resource preservation is so important as to warrant a change in the priorities of the *Yosemite Valley Plan*: “I think the plan’s mission should be the following priority: first, to preserve the natural habitat, wildlife and scenery; second, to educate visitors so they understand the details in the balance of nature so they will help preserve the park for future generations.”

Reducing development in Yosemite Valley is closely related to resource protection in many respondents’ minds. “YNP is not a resort. It is a park. If people want TV, computer hook ups, swimming pools, tennis courts, hair dryers and golf courses they should go to a resort. Visiting a national park is about the scenery at the park,” claims one person. “The Yosemite Valley as a whole, but especially the Merced River, needs to be protected from further destruction by the current philosophy of the NPS that more development is good for the future of our parks,” avows another. Development is an impediment to the enjoyment of the Valley for many of these respondents.

Other people insist that balancing conservation with visitor enjoyment, rather than emphasizing resource protection, is the essence of the Park Service’s mission. Accordingly, they remark that the *Yosemite Valley Plan* should reflect that balance. “The National Park Service has the dual responsibilities to ‘conserve’ and ‘provide for the enjoyment.’ It seems that the second part of the commission is being de-emphasized in these proposals,” offers one constituent. Several respondents believe the preservation mandate is superseding the visitor enjoyment directive in the *Draft Yosemite Valley Plan/SEIS*. Within this group, some individuals exhort the National Park Service to place more emphasis on visitor enjoyment in the plan. “Humans come first,” asserts one person. Believing that the National Park Service has skewed its original priorities, another individual feels that the park service should be relieved of its authority to run Yosemite National Park. “Return ownership and stewardship of Yosemite Valley to the State of California,” this person advocates.

47. Public Concern: The *Yosemite Valley Plan* should promote the needs of future generations.

"I have discussed the various alternative plans with pals, and have been shocked at how deep some emotional attachments are to Housekeeping Camp or Lower Pines, or any of the many others for which fond memories remain. If we cave in to that kind of thinking, we'll have the Firefall back . . . Many of us old timers—including me, I'm sure—will yearn for events and places that were never appropriate. But you must move past those things and conceive of a Yosemite Valley for our great-grandchildren." (Individual, Penngrove, CA - #95)

"The Park System, as I understand it, was not created for entrepreneurs, nor specifically for the deification of an ever expanding number of visitors—it begins with the entitlement of Yosemite and the wildlife within to something resembling a life on their own terms, which will insure their existence for generations of Americans to come." (Individual, San Diego, CA - #316)

Response: The changes proposed in the *Final Yosemite Valley Plan/SEIS* are based upon a better understanding of ecological processes, cultural and historical treasures, visitation trends, and related issues. The mission of the National Park Service is, "...to conserve the scenery and the natural and historic objects and the wild life therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations." The National Park Service must examine the ways in which the public has used Yosemite Valley in the past and modify those practices where necessary.

95. Public Concern: The *Yosemite Valley Plan* should emphasize resource protection.

"I feel that the plans that you have set forth are reasonable. In fact, they may be too lenient. Nevertheless, the minor inconveniences that will befall travelers as a result of these plans are worth it. It is much more important to protect the quality of the park, and its wildlife, than to make it easier for tourists to park. To say otherwise is laughable." (Individual, Arlington, VA - #318)

"As an ecologist, veteran of many Yosemite Association seminars, and author of a technical flora, I am gratified that your current plan emphasizes the protection and restoration of natural communities within the Valley. I would particularly urge attention to degraded riparian areas, wetlands, and meadows." (Individual, Carmel Valley, CA - #200)

"Please, in planning for the valley, please protect the river and the natural values of the valley, not the concessionaires and the auto industry." (Individual, San Anselmo, CA - #386)

"Please keep in mind the original intent of this and other National Parks, and that is to preserve the natural beauty and wonder of the area. John Muir, Secretary Pinchot and Teddy Roosevelt would turn over in their graves if Yosemite were turned into a commercial amusement park. Stand firm against the big money interests that are waiting outside the park with blueprints, machines and cement trucks poised to decimate this natural wonder. The country, indeed the world is watching how you shoulder this awesome responsibility. The appreciation of a grateful nation await your positive environmentally friendly decisions." (Individual, Peoria, AZ - #100)

Response: The National Park Service takes all aspects of its mission very seriously, especially its responsibilities "to conserve..." and to provide for the enjoyment" as articulated in the Organic Act of 1916. The public has offered a wide range of opinions regarding the need to protect natural and cultural resources in Yosemite Valley, as well as provide for visitor access and use. As indicated in Chapter 1, Purpose of and Need For the Action, of the *Final Yosemite Valley Plan/SEIS*, the National Park Service seeks to achieve the five goals of the *General Management Plan*, "to ensure both the long-term preservation and public enjoyment of Yosemite Valley."

Consequently, resource protection is a key element of the action alternatives presented in the *Final Yosemite Valley Plan/SEIS*. For example, protection of the Merced River and associated resources such as riparian zones, meadows, and wetlands is emphasized throughout the plan, including the Preferred Alternative (Alternative 2). Refer to Chapter 2, which describes highly valued resources and a description



of Alternative 2, for information regarding the measures proposed to protect the Merced River ecosystem and other important park resources.

305. Public Concern: The National Park Service should change the priorities of the *Yosemite Valley Plan*.

“I think the Plan’s Mission should be the following priority: First, to preserve the natural habitat, wildlife and scenery. Second, to educate visitors so they understand the details in the balance of nature so they will help preserve the Park for future generations. Third, to preserve historic objects.” (Individual, Orange, CA - #2255)

Response: To change the priorities of the *Yosemite Valley Plan* as suggested would be inconsistent with the park’s establishing legislation, the mission of the National Park Service, and the guidance set forth in the 1980 *General Management Plan*. The two primary purposes for Yosemite National Park, as established in the Yosemite Valley and the Mariposa Big Tree Grove federal grant of 1864, and subsequent legislation, consist of preserving the resources that contribute to Yosemite’s splendor and uniqueness, and making the varied resources of Yosemite available to people for their enjoyment.

The Organic Act of 1916 requires the National Park Service “to conserve...” and “to provide for the enjoyment.” Providing for and promoting visitor use, understanding, and enjoyment of Yosemite Valley and its resources is a key component of the agency’s mission, as well as one of the five goals for the park articulated in the *General Management Plan*. Refer to Chapter 1, Purpose and Need, for additional information regarding laws and previous planning that guide the direction of the *Yosemite Valley Plan*.

49. Public Concern: The *Yosemite Valley Plan* should require decreased development in Yosemite Valley.

“I welcome and strongly support the Park Service’s proposal to cut private automobile traffic in the Valley by 60 percent. Since all of us are the main threat to the Park, I also welcome and support the proposals to remove parking spaces, buildings and unnecessary development from the Valley and to restore its natural systems. These proposals—if carried forward and implemented—will create a better experience for visitors to this great place now and in the future. In fact, I support even stronger steps than now proposed. I’d like to see any new lodging in the gateway cities rather than in the park.” (Individual, Altadena, CA - #30086)

“The purpose of this letter is to demand that you stop development in our national parks and preserve them for future generations in a state that approximates wild and natural, not a state that approximates theme park with paved parking lots, nature exhibits, and inadequately small pockets of natural beauty. The Yosemite Valley as a whole, but especially the Merced river, needs to be protected from further destruction by the current philosophy of the NPS that more development is good for the future of our parks.” (Individual, Oakland, CA - #119)

“YNP is not a resort. It is a park. If people want TV, computer hook ups, swimming pools, tennis courts, hair dryers and golf courses they should go to a resort. Visiting a national park is about the scenery at the park. A National Park should not be made into a resort or a convention center or anything other than what it is.” (Individual, Porterville, CA - #3141)

Response: As described in Chapter 1 of the *Final Yosemite Valley Plan/SEIS*, the National Park Service is seeking to achieve the five broad goals of the 1980 *General Management Plan*: (1) reclaim priceless natural beauty, (2) allow natural processes to prevail, (3) promote visitor understanding and enjoyment, (4) markedly reduce traffic congestion, and (5) reduce crowding. A range of alternatives has been developed to meet these goals as they relate to Yosemite Valley. Each of the action alternatives provides a different approach to providing needed visitor accommodation while protecting resources in the Valley and each reduces development in some aspects in the Valley. Alternative 2 achieves a reasonable balance between resource protection and the provision of facilities and services to enhance visitor enjoyment and understanding.

In addition, protection of the Merced River and associated resources such as riparian zones, meadows, and wetlands is a key element of the *Final Yosemite Valley Plan/SEIS*, particularly the Preferred Alternative (Alternative 2). Please refer to Vol. IA, Chapter 2, Alternatives, describing highly valued resources and Alternative 2, for information regarding the measures proposed to protect the Merced River ecosystem.

With respect to keeping all new lodging outside the Valley, Alternative 2 of the *Final Yosemite Valley Plan/SEIS* would reduce overall lodging in the Valley by 24%. Although new lodging would be constructed at Yosemite Lodge to replace some of the flood-damaged units, the total number of units in Alternative 2 (251 units) would remain less than that recommended in the 1992 *Concession Services Plan* (440 units) and less than proposed in the *Draft Yosemite Valley Plan/SEIS* (386 units). Lodging at Curry Village would be increased from what was proposed in the *Draft Yosemite Valley Plan/SEIS* to 487 units under the Preferred Alternative, but still a reduction from the existing 628 units.

48. Public Concern: The *Yosemite Valley Plan* should balance conservation with visitor enjoyment.

“I do not believe that most visitors to Yosemite would consider the proposed changes to be beneficial. Perhaps a poll of park visitors should be commissioned. It seems that a vocal minority continues a push to further reduce services within the Park every several years, this time taking advantage of the recent floods. The National Park Service has the dual responsibilities to ‘conserve’ and ‘provide for the enjoyment.’ It seems that the second part of the commission is being de-emphasized in these proposals.” (Individual, Tucson, AZ - #30183)

“In response to your call for dialogue on the new plan for visitor utilization of the Yosemite Valley, it seems the National Park Service plans to continually make our national treasures and in particular Yosemite Valley less accessible and less user friendly. This is intolerable! Instead of trying to accommodate the greater number of expected visitors, you attempt to reduce by half the present access. . . It is the responsibility of the Park Service to not only preserve our National Parks but also provide for our citizens ability to enjoy the preserved beauty.” (Individual, Anaheim, CA - #269)

Response: The National Park Service takes all aspects of its mission very seriously, including both the responsibilities “to conserve... and to provide for the enjoyment” as articulated in the Organic Act of 1916. The public has offered a wide range of opinions, regarding the appropriate level of development in Yosemite Valley as well as the need to protect natural and cultural resources. As indicated in Vol. IA, Chapter 1 of the *Final Yosemite Valley Plan/SEIS*, the National Park Service seeks to achieve the five goals of the *General Management Plan* to ensure both the long-term preservation and public enjoyment of Yosemite Valley.

The action alternatives presented in Vol. IA, Chapter 2 of the *Final Yosemite Valley Plan/SEIS* provide a range of approaches to improve visitor use and resource protection. Management deliberation included all aspects of the plan and all issues raised by public concerns. It also included input from consultation between park staff, government, agencies, and Native American Tribes. In many cases, staff was asked to undertake additional analysis to support these management discussions. There were a number of important changes made to the Preferred and other action alternatives presented in the *Draft Yosemite Valley Plan/SEIS* in preparing the *Final Yosemite Valley Plan/SEIS*. These changes are discussed at the beginning of Volume IA, Chapter 2.

Please refer to Vol. IA, Chapter 1 of the *Final Yosemite Valley Plan/SEIS* for additional information regarding the National Park Service’s planning philosophy and goals for achieving visitor enjoyment and resource protection in Yosemite Valley.
(Also see response to concern #55.)



335. Public Concern: The *Yosemite Valley Plan* should emphasize visitor enjoyment.

“The primary focus of Yosemite as a national park should be for the human experience. We’re not only a national park, we’re a world treasure. I have experienced some of the exclusionary attitudes waiting to get into the park. I’m not in favor of reducing campgrounds or beds. I’m in favor of managing the use better. Humans come first. This is a national park for human enjoyment, for all of our enjoyment, not just the few, but all of our enjoyment.” (Public Hearing, Sonora, CA - #20285)

“This is a public park, not a wilderness area. The emphasis should be on effective use by people, not on returning the area to pristine, wild use.” (Individual, Boca Raton, FL - #1174)

Response: One of the goals of the *Yosemite Valley Plan* (see Vol. IA, Chapter 1, Direction for this Planning Effort–Goals) is to promote visitor understanding and enjoyment. The *Final Yosemite Valley Plan/SEIS* proposes many actions to continue and to protect the diversity of visitor opportunities and experiences in Yosemite Valley. Other goals would also contribute to visitor enjoyment: reclaiming priceless natural beauty, allowing the natural processes that created Yosemite Valley to prevail, reducing traffic congestion, and reducing crowding. By identifying, protecting, and restoring Yosemite Valley’s characteristic features and providing only such development that complements the natural resources and related experiences, visitors would be able to enjoy a Yosemite Valley substantially closer in character to that first set aside for public protection and enjoyment in 1864. (Also see responses to concerns #1061 and #55.)

283. Public Concern: The National Park Service should return ownership and stewardship of Yosemite Valley to the State of California.

“I advocate a sixth alternative. Return ownership and stewardship of Yosemite Valley to the State of California.” (Public Hearing, Sonora, CA - #20287)

Response: Returning ownership and stewardship of Yosemite Valley to the State of California is an alternative outside the scope of the *Draft* and *Final Yosemite Valley Plan/SEIS*. Such an action would require new legislation and is not a reasonable alternative that would meet the purpose and need for the plan. No information currently exists that would indicate a transfer of ownership to the state would, in and of itself, aid in the achievement of the purpose and need for the plan.

Section 2.2 ~ Planning Process

The process used in creating the *Yosemite Valley Plan* is central to many of the public's concerns. Numerous suggestions for improvement are offered to assist the Park Service in the preparation of the *Final Yosemite Valley Plan/SEIS*. One conservation organization believes the National Park Service should clarify the nature of the decisions that are to be made based on the Plan. "We believe the Park Service should state that the YVP sets only maximum limits and boundaries on major development projects (such as Yosemite Lodge) and that less-intensive development options will be considered in further project planning documents," this group suggests. One citizen feels the current document is unclear as to when the alternatives in the plan would be implemented. This respondent believes the National Park Service should explicitly state in its final plan whether the requirements contained within will be applied seasonally or perennially.

Some respondents believe that the Park Service "superficially addressed" the cost benefit analyses required for the *Draft Yosemite Valley Plan/SEIS*. The economic practicality of various options within the plan should be given greater weight, according to these respondents. Others feel that the National Park Service should establish goals and objectives to guide the restoration programs contained within the *Yosemite Valley Plan*. Doing so would "capture the public's attention and keep it focused on the benefits of restoration," according to one conservation group.

Although many respondents praise the layout and clarity of the maps contained in Volume IC of the *Draft Yosemite Valley Plan/SEIS*, an equal number of citizens offer suggestions for improvement. "The bubble maps which the NPS presents in the Valley plan are completely inaccurate and misleading," laments one person. "About half of the (very large) area depicted as restoration at Yosemite Lodge never had development." Another individual notes that the Yosemite View area is slated for a land exchange with a motel developer who plans on building on the site. "This development should be depicted in purple on the maps, as NPS is fully aware that it is proposing to exchange the federal parcel for development. The site north of Yosemite View on the hillside should also be depicted in purple. The radiating impacts of adding hundreds of employees in sensitive resource areas should be shown," according to this person.

Other respondents observe that facilities they wish to locate on the maps are either difficult to distinguish or missing entirely. Several people believe that the *Yosemite Valley Plan* should include graphic representations showing the development to be removed, replaced, or built in Yosemite Valley. Others feel that *Yosemite Valley Plan* maps should more clearly identify the cultural resources of Yosemite Valley. One historical preservation society mentions, "The plates for the action alternatives illustrate areas for redevelopment and natural resource restoration, but do not indicate what cultural resources would be lost."

In addition to the aforementioned suggestions, some respondents offer diverse concerns on various planning topics. One individual believes the National Park Service should conduct an evaluation of the entire Yosemite Valley planning process. Another individual requests that the National Park Service assess the potential impact of the *Yosemite Valley Plan's* reduction of visitors on the environmental movement. "Where do we think the next generation of our environmentalists are going to come from?" questions this respondent. "It's not going to be Harvard and Yale, it's going to be the people that have had the opportunity to get into the



wilderness.” Any curtailment on visitor access, may, in the long run, have deleterious effects on the environmental movement, according to this speaker.

468. Public Concern: The National Park Service should clarify the nature of *Yosemite Valley Plan* decisions.

“Clarify the nature of YVP decisions. We believe the Park Service should state that the YVP sets only maximum limits and boundaries on major development projects (such as Yosemite Lodge) and that less-intensive development options will be considered in further project planning documents.” (Conservation Organization, San Francisco, CA - #4594)

Response: To fully understand and evaluate potential impacts to the environment as required by the National Environmental Policy Act (NEPA), the *Final Yosemite Valley Plan/SEIS* identified, for each action in an alternative, the land area needed, then evaluated impacts assuming the action would fully encompass the area. Future land use could include restoration, redevelopment, or new development. It is anticipated that these areas would be the maximum land needed. The *Final Yosemite Valley Plan/SEIS* also identifies general land use capacities of these areas; as site designs proceed, the exact footprint and relationship would be confirmed for the function density and mix of development identified. Additional National Environmental Policy Act compliance and public involvement may be necessary for actions if:

The proposed actions extend beyond the land areas identified and analyzed in the *Final Yosemite Valley Plan/SEIS*.

The proposed actions involve a substantive change in location, function, and capacity from that discussed in the *Final Yosemite Valley Plan/SEIS*.

A previously unknown resource is discovered, such as an archeological site or a threatened or endangered plant or animal species.

178. Public Concern: The National Park Service should clarify whether the *Yosemite Valley Plan* will be applied seasonally or perennially.

“Our environment and Yosemite must be preserved, but I don’t feel the proposed plan is the answer. One question is never addressed or answered . . . Does this plan pertain only to the peak summer season or all year?” (Individual, North Fork, CA - #18)

Response: The *Final Yosemite Valley Plan/SEIS* Preferred Alternative calls for land-use changes, such as the location and number of lodging units, the location and number of campsites, employee housing, day-visitor parking, and visitor service facilities in Yosemite Valley. The land-use changes in the plan would remain in effect on a year-round basis. The number of parking spaces provided for day visitors to Yosemite Valley also would remain constant during the year.

From November through March it is expected that the day-visitor parking spaces provided in the Valley would be sufficient to serve all day visitors. As a result, from November through March the out-of-Valley day-visitor parking areas would be closed and no out-of-Valley shuttle service would operate.

363. Public Concern: The *Yosemite Valley Plan* should include an improved cost-benefit analysis.

“Cost/benefit analyses are superficially addressed in the Plan. The practicality of various options should be given greater weight within the Plan. This is particularly relevant to the Out-of-Valley shuttle bus transit system.” (Business, Yosemite National Park, CA - #3962)

Response: Although it would be possible to perform a cost-benefit analysis specific to individual actions within an alternative, such as the out-of-Valley bus transit system, the *Final Yosemite Valley Plan/SEIS* does present the total estimated costs for capital and operating costs for each of the action alternatives in Vol.IA, Chapter 2, Alternatives. The out-of-Valley bus transit system is only one of many actions that have been combined to formulate each of the action alternatives evaluated and analyzed in the *Final Yosemite Valley Plan/SEIS*. The National Park Service considers understanding the total costs of implementing each of the action alternatives in a holistic manner is more important, as it provides the best opportunity to compare the overall costs between each of the alternatives.

It is recognized, however, that overall costs are but one of many comparisons between each alternative used to help identify which would be most successful at accomplishing the purpose and need for the *Yosemite Valley Plan*: to restore, protect and enhance natural and cultural resources, including the Merced River's Outstandingly Remarkable Values; reduce automobile congestion; provide opportunities for enhanced, high-quality resource-based visitor experience; and provide effective park operations. The National Park Service uses several tools to assist in the decision-making process to develop alternatives and identify a Preferred Alternative. These include Value Analysis and Choosing By Advantage. Additional text has been added in Vol. IA, Chapter 2, Alternatives, that describes how the National Park Service applied the Choosing By Advantage process in development of the alternatives for the *Final Yosemite Valley Plan/SEIS*.

509. Public Concern: The *Yosemite Valley Plan* should include goals and objectives for restoration planning.

"To capture the public's attention and keep it focused on the benefits of restoration, we recommend that the Service establish goals and objectives to guide its restoration planning, and paint a clear, direct, and compelling picture of what the restored Yosemite Valley will look like after the full implementation of this plan." (Conservation Organization, San Francisco, CA - #4594)

Response: The action alternatives of the *Final Yosemite Valley Plan/SEIS* call for a variety of restoration activities. Vol. IA, Chapter 1, Purpose and Need, mentions that, "The alternatives being considered ... seek to restore significantly altered natural systems and protect unaltered systems" to allow natural processes to prevail—one of the five *General Management Plan* goals. All restoration actions are intended to meet the goals of the *General Management Plan*, but specific objectives vary from site to site depending on the site characteristics. Some site restoration objectives are also guided by cultural landscape and ethnographic resource values, as well as by constraints created by retention of infrastructure and uses that make complete restoration impractical or infeasible. Also, "some design-level details for specific elements of the action alternatives are not fully developed in the *Yosemite Valley Plan*. This is because additional planning and analysis would be necessary before these projects could be implemented." These include restoration projects. However, general objectives are noted in the text at the beginning of each action alternative.

552. Public Concern: The *Yosemite Valley Plan* should include accurate maps of management areas in Yosemite Valley.

"The bubble maps which the NPS presents in the Valley Plan are completely inaccurate and misleading. Though readers cannot locate existing buildings as points of reference, we have strained to analyze these maps based on our prior analysis, other large scale maps, cross-reference to the earlier VIP, and on-the-ground knowledge of Yosemite. When using colored areas to indicate restoration versus new development or redevelopment, the maps greatly over-represent 'restoration' areas. For instance at the Lodge Area, NPS represents many acres of restoration in a shade of dark green (see Vol. 1C, Plate 2-1). Large areas of 'restoration' at Yosemite Lodge are shown. In fact these areas cannot be restored, as there is no development in these areas (south of Yosemite Lodge). The description under 'No Action' bears this out. About half of the (very large) area depicted as restoration at Yosemite Lodge never had development." (Conservation Organization, Yosemite, CA - #7883)



Response: Plates in Volume IC illustrate the location and extent of the actions in Yosemite Valley for each alternative in the *Final Yosemite Valley Plan/SEIS*. The land areas displayed depict existing development, redevelopment, new development, and natural resource restoration. Each area was carefully located using the best and most accurate information available for Yosemite Valley, including 1"=200' survey-grade engineering drawings, field surveys throughout the Valley, and digital orthophotos (large-scale aerial photos) provided by the U.S. Geologic Survey. In addition to the location of the actions, the land areas accurately depict the largest possible extent of actions in an area.

Existing development areas were delineated by evaluating the extent of current development areas. These determinations did not necessarily include adjacent areas that could experience related radiating resource impacts. In the action alternatives, (Alternatives 2, 3, 4, and 5) existing development represents no change from current conditions. Redevelopment land areas show the largest possible extent of existing development that could be modified by actions, including the elimination or construction of structures, reconstruction or realignment of transportation corridors, and even small, localized areas of restoration. The new development category indicates that a development footprint has been designated for an area that is currently undeveloped. As with existing development and redevelopment, the maximum extent of this new development is depicted on the plates.

Likewise, the maximum extent of restoration actions is shown, including some areas where restoration could occur outside of existing development boundaries. Restoration could occur in areas between existing development and the Merced River, where human intervention has altered floodplain and riparian characteristics through overuse. One area, between the existing development at Yosemite Lodge and the Merced River, was substantially altered by cutting off and filling in natural drainage channels in an effort to protect Yosemite Lodge from flooding (Milestone 1978). Restoration of developed land at Yosemite Lodge would likely extend to the river in order to fully restore the hydrology of the area.

Other locations with a restoration land area encompassing land outside of existing development boundaries include the area between the river and existing campsites at North Pines and Lower Pines Campgrounds, as well as riparian areas along the edges of Backpackers Campground and the former Group Campground. These sections, in particular, are in the River Protection Overlay and are considered impacted by the development adjacent to the watercourses.

553. Public Concern: The *Yosemite Valley Plan* maps should identify planned land exchange parcels that are designated for development.

"The Draft River Plan and the DVP propose to hand off the publicly owned, valuable, and sensitive site at Yosemite View to Fischer Motels (for development as a hotel, which would destroy the ecology of the area). This development should be depicted in purple on the maps, as NPS is fully aware that it is proposing to exchange the federal parcel for development. The site north of Yosemite View on the hillside should also be depicted in purple. The radiating impacts of adding hundreds of employees in sensitive resource areas should be shown." (Conservation Organization, Yosemite, CA - #7883)

Response: This concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan*. A land exchange in El Portal has not been approved, nor is it a proposed action in any of the alternatives included in the *Draft or Final Yosemite Valley Plan/SEIS*. However, the potential cumulative impacts of a land exchange in El Portal, if it were to occur, are considered in Vol IB, Chapter 4, Environmental Consequences.

499. Public Concern: The *Yosemite Valley Plan* should include graphic representations showing the development to be removed, replaced, or built in Yosemite Valley.

“The Park Service must include a table or other graphic representation quantifying the development the Park Service intends to remove, together with the new or replacement development that will be allowed under the plan.” (Conservation Organization, San Francisco, CA - #4594)

Response: Volume IC, of the *Final Yosemite Valley Plan/SEIS* contains a series of 45 plates illustrating the study area, alternative development considerations, and the proposed actions for each alternative. At a minimum, each of the five alternatives has seven individual graphics depicting the type and location of actions considered in Yosemite Valley, El Portal, and Wawona. The actions are represented by “bubbles,” which define the maximum extent of an action as well as the type of action proposed for that area. Actions addressed in the *Final Yosemite Valley Plan/SEIS* are divided into four development categories on the plates, each represented by a different color: (1) Existing Development/No Change, (2) Redevelopment, (3) New Development, and (4) Natural Resource Restoration. (For definitions of these action types, see Volume IC.) In addition to showing the location of existing, new, changed, and removed development in Yosemite Valley, El Portal, and Wawona, the plates in Volume IC also indicate the most likely location of new or altered transportation corridors.

Vol. IB, Chapter 4, Environmental Consequences, contains several sections that provide tables showing acres of impact for actions evaluated in each alternative. The acres of disturbance in these sections are based on the same information used to develop the graphics in Volume IC. The spatial extent and type of proposed actions described above were analyzed with resource data in the park’s geographic information system (see Vol. IB, Glossary) in order to generate these acres of disturbance. See Chapter 4, Environmental Consequences, Methodologies and Assumptions, for more information on how areas of impact were quantified for different topic areas in each alternative.

705. Public Concern: The *Yosemite Valley Plan* should adequately identify and map the cultural resources of Yosemite Valley.

“We continue to be frustrated by the organization and graphic layout of Yosemite National Park planning documents. As was the case with the VIP and the Wild and Scenic River Plan, cultural resources affected under one or more of the various alternatives have not been adequately identified and mapped. For example, the Cultural Resources section of Table A in the Executive Summary makes mention of only a fraction of the historic resources which would be lost under the various alternatives. Likewise, while plates for Alternative 1 clearly illustrate the existing conditions, including what appear to be all existing buildings, but no attempt is made to identify historic structures. The plates for the action alternatives illustrate areas for redevelopment and natural resource restoration, but do not indicate what cultural resources would be lost.” (Non-Governmental Organization, San Francisco, CA - #7885)

Response: The revised plates in the *Final Yosemite Valley Plan/SEIS* (Volume 1C) distinguish historic structures from modern facilities. By comparing plates for each action alternative with the plates for Alternative 1, one can see which historic structures would be lost. While there are no graphics dedicated to displaying cultural resources information, the Highly Valued Resources plate depicts both natural and cultural resources.

184. Public Concern: The National Park Service should conduct an evaluation of the Yosemite Valley planning process.

“The National Park Service should conduct a post-evaluation of the Yosemite Valley planning process, with a view to devising and seeking constructive changes in its own planning study guidelines that will allow provision of more useful information for readers in the summary section of the finished document.” (Individual, Berkeley, CA - #1158)



Response: This concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan*. The National Park Service appreciates the suggestion that a post-project evaluation of the planning process be conducted. It is the goal of park staff to continue to improve the planning process, including communication and public involvement.

343. Public Concern: The National Park Service should assess the potential impact of the *Yosemite Valley Plan*'s reduction of visitors on the environmental movement.

“Now, I hear a lot of rhetoric about planning that we want to keep Yosemite for the future generations. I believe the children are the future generations. And this idea—well, the one question is, where do we think the next generation of our environmentalists are going to come from. It's not going to be Harvard and Yale, it's going to be the people that have had the opportunity to get into the wilderness. All of the future environmentalists are going to be either the children that are now experiencing the wilderness or people that come in and see Yosemite and get inspired by it. The idea that we could sacrifice the children's Yosemite experience so that some adults can have a better Yosemite experience, I really have a problem with. I feel that, you know, from an environmental standpoint we need to give the children an opportunity, and I think by denying them an opportunity we are doing a disfavor to the environment—the environmental process.” (Public Hearing, Santa Clara, CA - #20464)

Response: The *Final Yosemite Valley Plan/SEIS* places a strong emphasis on visitor experience, which is enhanced by greater emphasis on restoring and preserving highly valued resource areas; by recognizing the importance of natural processes and cultural values; and by understanding and respecting river system and oak woodland ecology. The *Yosemite Valley Plan* would enhance visitor understanding and experience through its restoration of highly valued resources and natural processes as well as through its enhanced educational facilities and programs. Overnight accommodations would continue to be composed of a range of options including camping, rustic lodging, and economy-level lodging. Visitor experience of the north side of Yosemite Valley would be greatly improved by the closure of Northside Drive to vehicle traffic from Yosemite Lodge to the El Capitan crossover. Visitor centers at park entrances would help people plan their visits and know what experiential opportunities exist, including the vast opportunities available outside of the Valley, that still can be part of an essentially Yosemite National Park experience. Possibly no better lesson can be learned by children and future environmentalists than by seeing actions taken to correct past habits based on respect, new understanding, and a willingness to change habits for a greater good rather than on individual desires.

Section 2.3 ~ Relationship to Other Planning Efforts

Several individuals are concerned with the Yosemite Valley Plan's compliance with current planning efforts, namely the *General Management Plan*, the *Merced River Plan*, the Visitor Experience and Resource Protection Plan, and the Wawona Town Plan. Comments regarding these plans, as well as past and future Yosemite Valley projects, are covered in this section.

2.3.1 ~ The 1980 *General Management Plan*

The goals of the *General Management Plan* (GMP) are positive and worthwhile objectives, according to many respondents. In particular, an individual suggests that, "The 1980 GMP goal of eliminating all private vehicles should be kept uppermost toward the time when, as technology advances, it will become feasible." Numerous people believe that the National Park Service should not only adopt actions that best achieve the goals of the *General Management Plan* but also include specific guidelines in the *Yosemite Valley Plan* outlining how to do so.

On the contrary, some respondents are not certain that the goals of the *General Management Plan*, now twenty years old, are still valid today. "Yosemite's GMP was developed in 1980 and states right in this preface that it is valid for 10 years—consequently, it is out-of-date. However, the Draft Yosemite Valley Plan disagrees, stating the objective of the Valley plan is to provide 'more specific detail' in carrying out the goals and actions of the GMP," observes one individual. Therefore, the National Park Service should revise the 1980 *General Management Plan*, according to this respondent.

50. Public Concern: The *Yosemite Valley Plan* should adhere to the principles contained in the 1980 *General Management Plan*.

"I urge you to adhere to the principles in the General Management Plan, especially regarding regional transportation and parking and shuttle connection options outside Yosemite Valley." (Individual, Modesto, CA - #123)

ELIMINATE ALL PRIVATE VEHICLES

"The 1980 GMP goal of eliminating all private vehicles should be kept uppermost toward the time when, as technology advances, it will become feasible. Even now, mandatory use of electric vehicles ought to be considered, if only to specify where design improvements are required. This would go a long way toward reducing the impact of private automobiles in the valley. Planning should not only allow for but also be directed toward this eventuality." (Individual, Laguna Beach, CA - #350)

Response: As indicated in Vol. IA, Chapter 1, Purpose and Need, the *Final Yosemite Valley Plan/SEIS* takes its basic direction from the 1980 *General Management Plan* for Yosemite National Park, including the five broad goals. In some instances the actions described in the *Final Yosemite Valley Plan/SEIS* alternatives include some provisions of the *General Management Plan* that are based upon new or more current information. However, the *Final Yosemite Valley Plan/SEIS*, specifically Alternative 2, the National Park Service's Preferred Alternative, is consistent with the overall direction and guidance of the *General Management Plan*, including the goal of reducing traffic congestion. Alternative 2 would reduce traffic congestion through establishment of a centralized parking facility at Yosemite Village, which would operate in conjunction with a shuttle system involving three out-of-Valley parking areas.

In developing alternatives for the *Final Yosemite Valley Plan/SEIS*, the National Park Service was diligent in considering the overall guidance presented in the *General Management Plan*, including the ultimate goal of removing private vehicles from Yosemite Valley. However, as indicated in Vol. IA,



Chapter 2, Alternatives Considered But Dismissed, removing all private vehicles from Yosemite Valley is technically and economically infeasible at this time. However, both the mass transit elements of the Preferred Alternative and collaboration to develop a regional transportation system provide initial and important steps to achieving this ultimate goal.

In addition, the National Park Service is committed to the use of alternative transportation technologies such as electric hybrid or other alternatively fueled vehicles as they become available and technically and economically feasible.

The availability of proven transit vehicle technology, supporting infrastructure such as fueling and maintenance facilities, environmental effects (including air emissions), and cost are factors in decisions relating to transit vehicles.

298. Public Concern: The National Park Service should adopt actions that best achieve the 1980 *General Management Plan* resource protection and restoration goals for Yosemite Valley.

“The National Park Service should adopt actions that best achieve the resource protection and restoration goals for Yosemite Valley. Although our comments on the Plan are primarily directed to compliance with NEPA and therefore focus on the procedural requirements of the environmental review process, we do support the NPS’ approach to focus on and further the goals articulated in the 1980 GMP. Toward that end, the NPS, in adopting its Record of Decision, should adopt the combination of actions outlined in the Plan that accomplish the greatest amount of restoration of natural processes, and that make the most rapid progress feasible toward removing private automobiles from Yosemite Valley.” (California Department of Justice, Sacramento, CA - #5430)

Response: As described in, Vol. IA, Chapter 1 of the *Final Yosemite Valley Plan/SEIS*, the National Park Service is seeking to achieve the five broad goals of the 1980 *General Management Plan*: (1) reclaim priceless natural beauty, (2) allow natural processes to prevail, (3) promote visitor understanding and enjoyment, (4) markedly reduce traffic congestion, and (5) reduce crowding. The range of alternatives has been developed to meet these goals as they relate to Yosemite Valley. Each of the action alternatives (Alternatives 2, 3, 4, and 5) provides a different approach to achieving resource protection while providing for visitor experience in the Valley. Each of the action alternatives reduces development to some extent in Yosemite Valley.

Resource protection and restoration are key elements of all of the action alternatives presented in the *Final Yosemite Valley Plan/SEIS*. For example, protection and restoration of the Merced River and associated resources such as riparian zones, meadows, and wetlands is emphasized throughout the document, including the Preferred Alternative (Alternative 2).

562. Public Concern: The *Yosemite Valley Plan* should include guidelines to achieve the five goals of the 1980 *General Management Plan*.

“The Sierra Club believes that the goals set forth in the 1980 General Management Plan for Yosemite National Park should guide planning within Yosemite Valley (together with a final valid plan for the Merced River under the WSRA). . . Experience in the ensuing years, as well as changing conditions, suggests the need for guidelines to indicate how these goals may be best achieved. These are the ones that the Sierra Club believes would help shape an appropriate plan for Yosemite Valley. Contain Development: No new sites should be developed or impacted. No new development should take place. This is the equivalent to the admonition to doctors to ‘do no harm’ in seeking remedies; Reduce Impacts: To restore habitat and to better allow natural processes to prevail, the total space occupied by development (i.e., its footprint) should be reduced steadily over time; Establish Limits: As an exceedingly popular park, Yosemite Valley is now drawing too many pressures that place stress upon its environment (i.e., ‘stressors’) . . . Plans must be laid to reduce them to levels that are no longer problematic. These stressors include vehicles, emissions, roads, parking places, facilities, and visitors; Prioritize Restoration Goals; Accommodate Visitors Responsibly; Visitors’ Experience: Efforts should be made to allow visitors the freedom to

seek their own preferred types of experience, particularly at seasons when stresses on the environment are not great. Visitors should not all be forced into a single mold.” (Conservation Organization, Fresno, CA - #7881)

Response: The National Park Service agrees that the five broad goals in the 1980 *General Management Plan* should guide planning in Yosemite Valley, as these goals are as valid today as they were in 1980. As described in Vol. IA, Chapter 1 of the *Final Yosemite Valley Plan/SEIS*, these goals provide the fundamental direction for Valley planning. The planning effort also follows numerous criteria to guide the achievement of the *General Management Plan*’s five goals, organized under protection of natural and cultural resources, visitor experience, and park operations. Please refer to Vol. IA, Chapter 1 of the *Final Yosemite Valley Plan/SEIS* for a presentation of these criteria.

323. Public Concern: The National Park Service should revise the 1980 *General Management Plan* for Yosemite National Park.

“Let’s talk about goals. The Park Service Director’s Order #2 on Park Planning states that ‘the National Park Service will maintain an up-to-date general management plan (GMP) for each unit of the national park system.’ Yosemite’s GMP was developed in 1980 and states right in this preface that it is valid for 10 years—consequently, it is out-of-date. However, the Draft Yosemite Valley Plan disagrees, stating the objective of the Valley Plan is to provide ‘more specific detail’ in carrying out the goals and actions of the GMP.” (Public Hearing, Oakhurst, CA - #20517)

Response: The *General Management Plan* is now 20 years old, and some members of the public have requested preparation of a new *General Management Plan*. However, many others have voiced their desire to see the 1980 *General Management Plan* more fully implemented.

The National Park Service has assessed whether to prepare a new general management plan. It has concluded that the guidance contained in the 1980 *General Management Plan*, as articulated in the plan’s five main goals, is still valid today. In addition, the National Park Service recognizes that this “exceedingly special Valley” deserves and requires a consistent, comprehensive management approach. Therefore, the *Final Yosemite Valley Plan/SEIS* provides specific detail in carrying out the goals of the *General Management Plan* as they relate to Yosemite Valley, updating specific actions as necessary based upon new information or changing conditions.

2.3.2 ~ The Merced River Plan

Proceeding with the Yosemite Valley planning process before completing the Merced River Plan (MRP) conflicts with statutory requirements and invalidates the public participation process, according to numerous respondents. “The Park Service’s superimposition of its proposed Valley Plan in the midst of the public and agency review and adoption process for the Merced Wild and Scenic River Comprehensive Management Plan frustrates informed public review and shortcuts essential environmental protections,” maintains one civic organization. For these reasons, numerous individuals, organizations, and government agencies urge the park service to stop work on the Valley Plan until a final decision is made on the Merced River Plan.

The establishment of Outstandingly Remarkable Values (Outstandingly Remarkable Values) and the River Protection Overlay (RPO) is another area of potential conflict between the Yosemite Valley and Merced River Plans, according to some citizens. One person asserts that the National Park Service should substantiate the linkage between the ORVs in both plans. Similarly, a U.S. Representative wishes to know what development is to be removed from the River Protection Overlay pursuant to the Merced River Plan. “I could not find in any of the documents a comprehensive listing of what exactly that removal entails, and request that such a summary document be developed and forwarded as soon as possible,” submits the elected official.



A National Park Service employee believes the *Merced River Plan* should be modified to permit camping in various areas of Yosemite Valley. “I ask that you consider altering the MRP before the Record of Decision to permit camping as needed in these three locations [Taft Toe, Sentinel/Yellow Pine, and El Capitan] to meet the GMP goal for number of campsites in Yosemite Valley,” this person recommends.

16. Public Concern: The National Park Service should not proceed with the *Yosemite Valley Plan* until the *Merced River Plan* is completed.

“I think the Draft Yosemite Valley Plan must wait until the Merced River plan is finalized. The Valley Plan acts like the segments proposed in the MRP are now policy instead of simply part of a proposal. The Valley Plan presumes much in regards to what the MRP will actually become. I think this is a serious flaw: serious enough to make it respond to the River plan, not vice versa. I am disappointed to see the Valley Plan continuing without resolving the river issues.” (Individual, Livermore, CA - #34)

“Stop work on the Valley Plan until the Merced River Plan is completed. Prepare a river plan that protects and restores the river and environs. Produce a Valley Plan based on a protective river plan with no more development in Yosemite Valley. . . Please do all you can to ensure the future health and beauty of the valley.” (Individual, No Address - #228)

“The Park Service’s superimposition of its proposed Valley Plan in the midst of the public and agency review and adoption process for the Merced Wild and Scenic River Comprehensive Management Plan (‘Merced River Plan’ or ‘MRP’) frustrates informed public review and shortcuts essential environmental protections. By law, the Valley Plan must be consistent with and implement the Merced River Plan. Section 12(a) of the Wild and Scenic Rivers Act (‘WSRA’), 16 U.S.C. section 1283(a), directs that the National Park Service ‘shall take such action respecting management . . . plans affecting . . . lands [adjacent to National Wild and Scenic Rivers] as may be necessary to protect such rivers in accordance with the purposes of the WSRA. The comprehensive management plans that federal agencies must adopt for rivers designated under the WSRA set forth these necessary protections. 16 U.S.C. 1274(d) and 1281(a). As Judge Ishii forcefully ruled in overturning the Park Service’s approval of the El Portal Road Improvement Project (‘Yosemite Road Project’) last July, ‘the persistent and protracted failure of NPS to complete the required [Merced River Plan] removes the basis for the [Park Service’s] conclusion that [the effects of a proposed project] are . . . allowable within the amount of protection that is required under the WSRA.’ *Sierra Club v. Babbitt*, 69 F. Supp.2d 1202, 1257 (E.D. Cal/ 1999) Because the Park Service had not adopted the long-overdue Merced River Plan before approving the Yosemite Road Project, Judge Ishii ruled that the Park Service’s ‘actions with respect to the planning and execution of the Project are arbitrary and capricious and therefore violate the substantive provisions of 16 U.S.C. 1281 [WSRA 10].’ Likewise here, it would be ‘arbitrary and capricious,’ and violative of the ‘substantive provisions’ of the WSRA, for the Park Service to plan and adopt the Valley Plan in the ‘absence of [the required Merced River Plan] that sets forth the allowable degrees of intrusion upon the [Merced] River’s [outstandingly remarkable values].’ *Sierra Club v. Babbitt*, supra, 69 F.Supp.2d at 1256. Because the required MRP has not yet been adopted, and will not be adopted until late July at the earliest, neither the Park Service, nor the public, can evaluate the proposed Valley Plan in accordance with the procedure mandated by the Wild and Scenic Rivers Act. Instead, the public—and presumably the Park Service—are left to speculate as to which of the five alternative versions of the MRP will be adopted. This profound uncertainty completely forecloses informed review of the Draft Valley Plan. The Park Service’s decision to close the public comment period on the Draft Valley Plan before adoption of the MRP plainly violates the clear mandate of the WSRA, in direct defiance of Judge Ishii’s final judgment on this point.” (Civic Organization, Oakland, CA - #7549)

Response: The National Park Service has closely coordinated the preparation of the *Yosemite Valley Plan/SEIS* with the *Merced Wild and Scenic Comprehensive Management Plan/FEIS*. Throughout the planning process the *Merced River Plan* has provided a template against which actions in the *Yosemite Valley Plan* were designed. As the *Merced River Plan* progressed, the *Yosemite Valley Plan* was continually evaluated and adjusted accordingly to ensure consistency with the provisions of *Merced River Plan*. For example, the management zoning and River Protection Overlay created by the *Merced River Plan/DEIS* guided the development of alternatives for the *Yosemite Valley Plan*. Changes made in the Preferred Alternative for the *Merced River Plan/FEIS*, and reflected in the Record of Decision, were

evaluated by members of the *Yosemite Valley Plan* team. As appropriate, changes were made to alternatives in the *Final Yosemite Valley/SEIS* to ensure their consistency with the final *Merced River Plan*. While a series of revisions were made to Alternative 5 in the *Yosemite Valley Plan* to conform to the final *Merced River Plan*, only minor adjustments were made to Alternative 2 and the other action alternatives to conform them to the final direction established by the *Merced River Plan*. In Alternative 2 of the *Final Yosemite Valley Plan/SEIS*, the Sandpit area in El Portal was designated for restoration instead of park operations, and slight adjustments in the configuration of road segments and lodging units at Yosemite Lodge were made to account for changes in the extent of the River Protection Overlay in that area. Each of the four action alternatives in the *Final Yosemite Valley Plan/SEIS* is consistent with the guidance and direction outlined in the final *Merced River Plan*. As detailed in Chapter 4, Environmental Consequences, each of these alternatives would be fully protective of the river corridor and river values.

Coordination between these plans is also appropriate because they both concern many of the same areas, Yosemite Valley and El Portal in particular, and because much of the same scientific information was used in the decision-making process for each plan. The *General Management Plan* also provides a common framework for both plans.

The National Park Service believes that adequate opportunity for public evaluation and involvement has been provided. The impacts of the alternatives of both plans have been fully disclosed, consistent with the requirements of the National Environmental Policy Act.

198. Public Concern: The National Park Service should clarify how Outstandingly Remarkable Values were established for Yosemite Valley and Merced River planning efforts.

“Please supply the data, including any studies that were performed, that establish the Outstandingly Remarkable Values as referenced in the Valley Plan, or in the unapproved and unrecorded Merced River Plan, or in the unapproved and unrecorded 1996 Draft Addendum Yosemite Valley Housing Plan, and substantiate this linkage between these plans. Please demonstrate how this linkage meets the requirements of the National Environmental Policy Act.” (Individual, Malibu, CA - #1164)

Response: The Merced River has been the subject of protection efforts since the early 1980s when it was studied as part of the National Rivers Inventory. The National Rivers Inventory was published in 1982 and identified in very general terms the scenic, recreational, geologic, wildlife, historic, and cultural Outstandingly Remarkable Values for the Merced River. Based on these findings, the study recommended the inclusion of the Merced River in the Wild and Scenic Rivers System.

In 1986, the Sierra National Forest issued a *Draft Forest Lands and Resource Management Plan*, which served as a follow-up to the National Rivers Inventory, undertaken jointly by the USDA Forest Service, the National Park Service, and the Bureau of Land Management. This study proposed that the Merced be designated a Wild and Scenic River and provided a more detailed analysis of the Outstandingly Remarkable Value of the main stem and South Fork Merced River. The study also listed the values in several sections as common and not an Outstandingly Remarkable Value.

Upon passage of the bill establishing the Merced as a Wild and Scenic River in 1987 (P.L. 100-149), there was no formalized list of the river’s Outstandingly Remarkable Values. Congress left it up to the land-managing agencies to further develop the Outstandingly Remarkable Values for the river. In the process of doing so, the National Park Service has refined and elaborated on those values.

In 1993, 1995, and 1996, the National Park Service conducted three internal river management planning workshops to study the Merced Wild and Scenic River’s Outstandingly Remarkable Values and to develop Merced River management and restoration strategies. These workshops were conducted in association with general land-use planning for the 1996 *Draft Yosemite Valley Housing Plan/Addendum*. Segments of both the main stem and South Fork of the Merced River were evaluated for the purpose of



developing Outstandingly Remarkable Values. These Outstandingly Remarkable Values were published in the 1996 *Draft Yosemite Valley Housing Plan*.

The Outstandingly Remarkable Values were subsequently refined in the *Draft Merced River Plan/EIS*, which was published in January 2000. The *Merced Wild and Scenic River Comprehensive Management Plan/FEIS*, which was published in June 2000, made a few additional refinements to the Outstandingly Remarkable Values. The refinements to the Outstandingly Remarkable Values, as a result of the *Merced River Plan* planning process, were based on the application of new scientific information, changed conditions in the river corridor, and an accurate reflection of the Outstandingly Remarkable Value criteria included in the Interagency Wild and Scenic Rivers Coordinating Council guideline for implementation of the Wild and Scenic Rivers Act. Two criteria are set forth by the Council for selection of Outstandingly Remarkable Values:

Is the value river-related or river-dependent?

Is the value rare, unique, or exemplary in a regional or national context?

The Outstandingly Remarkable Values, as published in the *Merced River Plan/FEIS*, and adopted in the Record of Decision, are the official Outstandingly Remarkable Values for National Park Service-administered segments of the river. Because the *Merced River Plan* is a guiding document for the *Yosemite Valley Plan*, *Yosemite Valley Plan* actions were designed to protect and enhance these Outstandingly Remarkable Values. The *Yosemite Valley Plan* also addresses situations where there is a conflict among Outstandingly Remarkable Values. See the “Merced Wild and Scenic River” impact topic in Chapter 4, Environmental Consequences, for impacts to Outstandingly Remarkable Values of each alternative.

The *Merced River Plan/FEIS* complied with the requirements of the National Environmental Policy Act by soliciting and responding to public comments gathered during scoping and formal comment periods. The *Final Merced River Plan* established the Merced River Outstandingly Remarkable Values that the *Yosemite Valley Plan* seeks to protect and enhance. During the *Yosemite Valley Plan* comment process, the public was able to provide feedback on the impacts of *Yosemite Valley Plan* actions on the Outstandingly Remarkable Values. These comments were considered by the National Park Service in developing the *Final Yosemite Valley Plan/FEIS*.

384. Public Concern: The *Yosemite Valley Plan* should clarify what development is to be removed from the River Protection Overlay pursuant to the Merced River Plan.

“The public should know and be informed that the River Plan guides decisions in the Valley Plan to a significant degree. However, in reviewing the Valley Plan, the only substantive comment concerning actions resulting from the River Plan is simply noted as ‘Remove development from the River Protection Overlay.’ I could not find in any of the documents a comprehensive listing of what exactly that removal entails, and request that such a summary document be developed and forwarded as soon as possible.” (U.S. Representative, Fresno, CA - #2951)

Response: As stated in the Introduction to Chapter 2, Vol. IA, Implementation of the River Protection Overlay in the *Final Yosemite Valley Plan/SEIS*:

“Development within the River Protection Overlay in Yosemite Valley would be removed, except when it is required for access to or across the river, for health and safety, for the maintenance of historic properties, and where it is impractical to locate facilities outside the River Protection Overlay.”

Table A, Summary of Alternatives, at the end of Vol. IA, Chapter 2, provides a list of the actions proposed under each of the alternatives of the *Final Yosemite Valley Plan/SEIS*, including identification of the developments proposed for removal from the River Protection Overlay. For example, this table states that Alternative 2 would, “Remove all Housekeeping Camp units from the River Protection Overlay

and highly valued resources, and restore area.” Also slated for removal would be Upper and Lower River Campgrounds, portions of Lower Pines and North Pines Campgrounds, a portion of Camp 6, a portion of Yosemite Lodge, and Sugar Pine Bridge and possibly Stoneman Bridge.

474. Public Concern: The National Park Service should modify the *Merced River Plan* to permit camping in various areas of Yosemite Valley.

“Taft Toe, Sentinel/Yellow Pine and El Capitan Picnic areas are all examples of areas without sensitive resources that could have been proposed for development. Of these, Yellow Pine was proposed in the GMP for camping. What study indicates that a change from the GMP proposal is needed in the Yellow Pine area? The Development Constraints map shows these areas affected by flooding or the rockfall shadow. Since many developed areas are in the rockfall shadow but are not proposed to be relocated, I assume rockfall shadows are not a constraint. I know it is possible to construct campgrounds in floodplains even under the guidelines presented by Executive Order, so this cannot be a constraint. The Scenic Analysis map shows the Taft Toe and Yellow Pine areas as B scenic and part of the El Capitan Picnic Area as A scenic. This should not constrain the development of campgrounds in these areas. It is only on the MRP Management Zone map that I find any substantial constraint to proposing any of these three areas as a campground. I ask that you consider altering the MRP before the Record of Decision to permit camping as needed in these three locations to meet the GMP goal for number of campsites in Yosemite Valley. These zoning alterations would be similar to those made to accommodate proposed parking in the areas of Taft Toe and Camp 6. Another area that could accommodate camping but is not proposed in the preferred alternative is the former Upper and Lower Rivers Campgrounds. The plan states that this area should be returned to its natural state, which was a mixed meadow and forest area. The restrooms in these campgrounds are some of the oldest in the Park so I suspect that this area has been in its altered state for many years. When I looked at the constraints presented to determine why the Park proposed to restore this area to its natural state instead of returning it to a campground, I found the following: This is a highly valued resource area, but so is Yosemite Village, Camp 6 and Housekeeping Camp and all are proposed for development. The Development Considerations map shows Rivers Camp is not even with the rockfall shadow; however it is within the floodplain. As stated previously, the floodplain should not constrain campground development. The scenic analysis map splits this area between A and B scenic which should not be a constraint since Yosemite Lodge is development within a scenic area. It is only when I look at the MRP maps that I find any type of constraint. As I requested above, I do so again at this time. Alter the MRP before the Record of Decision to permit the redevelopment of Rivers Campground that has long been used for visitor enjoyment.” (National Park Service Employee, Mariposa, CA - #6240)

Response: The *Merced River Plan* was developed to comply with the Wild and Scenic Rivers Act and National Park Service concerns regarding the restoration of the Merced River ecosystem. It is the intention of the National Park Service to use the *Merced River Plan* as a template against which future implementation plans such as the *Yosemite Valley Plan* will be judged to ensure that such plans protect and enhance the river’s Outstandingly Remarkable Values. The *Merced River Plan* provided general direction and guidance for actions proposed in the *Yosemite Valley Plan*. Because the *Merced River Plan* is a guiding document for the *Yosemite Valley Plan*, it would be inconsistent for the *Yosemite Valley Plan* to amend the *Merced River Plan*.

2.3.3 ~ Visitor Experience and Resource Protection Study

Although not commonly mentioned in respondents’ concerns, the Visitor Experience and Resource Protection Study (VERP) elicits a few comments, mostly from federal employees. The National Park Service should not reduce any aspect of visitor enjoyment below *General Management Plan* levels until the VERP is complete, according to one National Park Service employee. “To do so is premature in that it lacks supporting studies,” this person states. “Some studies were completed that do support changes but they are not adequate to support the degree of change proposed in these plans,” this individual concludes. A Forest Service employee believes the Park Service should expand the scope of the VERP study. “The proposed visitor experience and resource protection study should include the entire Park, portions of adjacent National Forests, and gateway communities,” according to this federal employee.



472. Public Concern: The National Park Service should not reduce any aspect of visitor enjoyment below *General Management Plan* levels until the Visitor Experience and Resource Protection Study is complete.

“The MRP and YVP make a promise to complete a Visitor Enjoyment / Resource Protection Study (VERP) in the years to come. I would be more accepting of these plans if this study had been completed beforehand. I feel the Park should not propose to reduce, below the GMP, any aspect of visitor enjoyment until the VERP is complete. To do so is premature in that it lacks supporting studies. Some studies were completed that do support changes but they are not adequate to support the degree of change proposed in these plans. The VERP study is needed to substantiate changes in facilities that support visitor enjoyment to levels below those presented in the GMP.” (National Park Service Employee, Mariposa, CA - #6240)

Response: Some actions in the *Final Yosemite Valley Plan/SEIS* would alter aspects of visitor enjoyment. However, these actions are not dependent on the completion of a Visitor Experience and Resource Protection study. For example, the 1980 *General Management Plan* prescribes a maximum daily use level (18,241 visitors) for Yosemite Valley, based on the number of day-visitor parking spaces, lodging units, and campsites. But, actions in the *Final Yosemite Valley Plan/SEIS*, while providing facilities to accommodate this number of visitors, would result in a redistribution of visitation between overnight and day visitors (see table 2-1). In each alternative, the number of campsites and overnight accommodations would be below the level proposed in the *General Management Plan*. The *General Management Plan*’s maximum daily use level was facility- and vehicle-based, not resource-based. At the same time, that plan proposed reductions in accommodations and camping and the removal of facilities from the most significant natural resources, the floodplain, the rockfall zone, and the riverbank. Studies identifying these areas and present impacts on them, along with other studies, have been utilized in the development of alternatives in the *Final Yosemite Valley Plan/SEIS*. These resource-based studies have resulted in the changes to the number of overnight accommodations. Another example of an action that could affect visitor enjoyment would be the change in access for some visitors to Yosemite Valley. Requiring that some day visitors in the busiest months of the year ride a shuttle bus to Yosemite Valley from an out-of-Valley parking area could alter visitor enjoyment. However, studies have identified this change in access as an effective way to reduce congestion, a principal goal of the *General Management Plan*, and have shown that a majority of park users would support such a measure.

While Visitor Experience and Resource Protection establishes standards for highly valued and other resources (including the quality of the visitor experience within those resources), and measures deviation from these standards, the actions proposed in the *Final Yosemite Valley Plan/SEIS* are in response to the already recognized existing loss of highly valued resources and functioning of natural systems (see Chapter 2, Developing a Range of Alternatives—Resource Stewardship). These actions are based on existing analyses and studies and the prescriptions of the *Merced River Plan/FEIS*. Since publication of the 1980 *General Management Plan*, the National Park Service has collected extensive data on resource conditions in the park such as river processes; wetland, meadow, and oak woodland ecology; geologic processes and hazards; hydrology; fire ecology; cultural landscape and historic properties surveys; archeology; visitor use patterns and preferences; air quality; traffic patterns; and rare, threatened, and endangered species. From these data, it is clear that adverse impacts to highly valued resources result from the present siting of some facilities. For those who associate visitor experience mostly with using a traditionally used campsite, lodging unit, strolling across a specific historic bridge, or the unfettered use of a private vehicle, there would be some diminution of visitor experience. For others who wish to find Yosemite’s natural environment and spectacular beauty in a more natural state and with fewer urban distractions, the visitor experience would certainly be enhanced.

It should be noted, however, that through implementation of Visitor Experience and Resource Protection, further restrictions on visitor use could occur. The Visitor Experience and Resource Protection process is designed to be ongoing in recognition of the dynamic character of natural processes and impacts of visitation. The Visitor Experience and Resource Protection process addresses user capacities by

establishing indicators of desired conditions for both visitor experience and resource condition (natural, cultural, and historical), which are regularly monitored to ensure that they are maintained at or above a specified standard. If deviation from the standard occurs, more restrictive management practices would be implemented.

(See also the response to concern #356.)

483. Public Concern: The National Park Service should expand the scope of the proposed Visitor Experience and Resource Protection Study.

“The proposed visitor experience and resource protection study should include the entire Park, portions of adjacent National Forests, and gateway communities.” (USDA Forest Service, Sonora, CA - #9221)

Response: It is beyond the scope of the *Final Yosemite Valley Plan/SEIS* to prescribe a Visitor Experience and Resource Protection process for the entire park and beyond. While there is interest in using the Visitor Experience and Resource Protection process on a wider scale to help the National Park Service address the issue of user capacities as mandated in the National Parks and Recreation Act of 1978, currently Visitor Experience and Resource Protection standards and indicators are being developed for areas that would be affected by implementation of the *Yosemite Valley Plan*. The *Merced River Plan/FEIS* also calls for the implementation of a Visitor Experience and Resource Protection process throughout the Merced River corridor (standards and indicators are being developed for this area as well), along both the main stem and south forks of the river.

2.3.4 ~ Wawona Town Plan

Many citizens express concern about a possible conflict between the Yosemite Valley Plan and the Wawona Town Plan. “The National Park Service should address whether the proposed housing development intended to house 198 entry-level concessioner employees complies with the existing Wawona Town Plan,” suggests a resident of that locale. Such a housing development will conflict, this person asserts, with Wawona’s plan to maintain its small community atmosphere. Another contends, “To remain consistent with the NPS mission, the zoning overlay in the River Plan as well as the provision for employee housing in Section 35 as set forth in Alternative 2, to the extent that it is inconsistent with the Wawona Area Specific Plan, must be deleted from their respective documents.”

721. Public Concern: The *Yosemite Valley Plan* should comply with the existing Wawona Town Plan.

“The National Park Service should address whether the proposed housing development intended to house 198 entry-level concessionaire employees complies with the existing Wawona Town Plan. I believe the assumption of compliance in the YVP is problematic for the following reasons: A primary Planning Goal of the Wawona Specific Plan is ‘to maintain the mountain, small community atmosphere of Wawona for the benefit of present and future residents of the community.’ (Land Use Policies and Standards Element, p.5) The Wawona Specific Plan further proposes a one and one-half acre minimum lot size on all private residential uses, including the pristine, forested site on which the YVP proposes building dormitory or apartment housing for nearly 200 employees.” (Individual, Wawona, CA - #3799)

“Land use issues for private property in Section 35 are subject to joint jurisdiction between the NPS and Mariposa County. On February 17, 2000 Superintendent Mihalic wrote a letter to Bob Pickard, Mariposa County Supervisor, regarding proposed amendments to the Wawona Area Specific Plan. In his letter Mr. Mihalic stated, ‘The National Park Service is not opposed to amendments to the Town Plan to facilitate such things as land exchanges or to clarify specific issues. However, the mission of the NPS is ‘. . . to conserve the scenery and the natural and historic objects and the wildlife therein and to provide for the enjoyment of future generations.’ Based on the congressionally mandated mission, the NPS cannot agree to any amendments to the town plan which change the small mountain



community atmosphere of Wawona or which allow for more intensive development of the area.’ On February 17, 2000 the congressionally mandated mission of the NPS would not allow for more intensive development of the Wawona area. A consideration posed by the River Plan (should an ROD be signed) would provide a zoning overlay on NPS property in Section 35 that would allow the high density housing proposed in Alternative 2 of the Draft Yosemite Valley Plan. On the basis of Superintendent Mihalic’s letter to Supervisor Pickard, the provisions of both plans are in violation of the congressionally mandated mission of the NPS. While it is recognized that the NPS is under direction by the current administration to expedite processing of these plans, there is no evidence that the administration’s direction is also to violate a congressional mandate. To remain consistent with the NPS mission, the zoning overlay in the River Plan as well as the provision for employee housing in Section 35 as set forth in Alternative 2, to the extent that it is inconsistent with the Wawona Area Specific Plan, must be deleted from their respective documents.” (Individual, Mission Viejo, CA - #4640)

Response: The National Park Service has made modifications to the Final Yosemite Valley Plan regarding the circumstances under which employee housing would be constructed in Wawona and in other areas of Yosemite National Park. These changes are found in Alternative 2 and are also described in response to Public Concern 456. With regards to Wawona, it is the intent of the National Park Service to locate additional housing outside the park where possible in accordance with National Park Service housing policies.

The *Final Yosemite Valley Plan/SEIS* Preferred Alternative does comply with the Land Use Policies and Standards of the Wawona Town Plan. Should housing be constructed in Wawona, the exact location and configuration of housing, as further developed through the site design process, would (1) consider and address potential conflicts between land uses by situating the housing so that non-compatible land uses are mostly buffered by physical terrain and open space, (2) provide housing in an orderly and limited way, (3) preserve historical sites and surroundings, (4) provide a cost-effective way of supplying utilities, (5) protect and enhance ecological and river values, and (6) retain the residential atmosphere of Wawona.

Finally, the National Park Service will continue to participate in a collaborative planning process for the community of Wawona with the Wawona Town Planning Advisory Committee, the Mariposa County Planning Commission, and the Mariposa County Board of Supervisors. Although ultimate responsibility for regulating land uses in federal and private lands in Wawona will remain with the National Park Service and Mariposa County, respectively, the National Park Service will strive, to the maximum extent possible, to coordinate land use planning in Wawona with Mariposa County and the Wawona Town Planning Advisory Committee.

2.3.5 ~ Past, Present, and Future Yosemite Projects

One conservation organization believes the *Yosemite Valley Plan* should account for the cumulative impacts of the proposed action in relation to past and ongoing projects. “Page 4.1-35 in Vol. 1B references twelve current or reasonably foreseeable design and construction projects that could impact archaeological resources. They are not identified. At 4.1-36 eight other projects are referenced which are similarly not identified or analyzed. These are two simple examples. More serious examples include the lack of evaluation of impacts which have already occurred from the widening of the El Portal Road project.” Such omissions, this group feels, should be corrected in the final document.

Another in-Valley project mentioned by many respondents is the Yosemite Falls Project that now has been incorporated into the *Yosemite Valley Plan*. According to some, the *Yosemite Valley Plan* should require the implementation of the Yosemite Falls Project. Redesigning and relandscaping the area at the base of the falls would greatly enhance the beauty of the site, they say. On the contrary, some contest the need for the project unless it is supported by clear ecological reasons.

550. Public Concern: The *Yosemite Valley Plan* should account for the cumulative impacts of the proposed action in relation to past and ongoing projects.

“While it provides an appendix of potential future projects, it provides little in the way of identification or evaluation of ongoing or past projects and impacts. For example, on page 4.1-35 in Vol. 1B references twelve current or reasonably foreseeable design and construction projects that could impact archaeological resources. They are not identified. At 4.1-36 eight other projects are referenced which are similarly not identified or analyzed. These are two simple examples. More serious examples include the lack of evaluation of impacts which have already occurred from the widening of the El Portal Road project. As you are fully aware, the federal court found that the NPS was in substantive violation of the Wild and Scenic Rivers Act for harming the ORVs.” (Conservation Organization, Yosemite, CA - #7883)

Response: In the Cumulative Impact Analysis in Vol. IB, Chapter 4 of the *Final Yosemite Valley Plan/SEIS*, examples of these twelve and eight projects, respectively, that could impact archeological resources are presented. These project examples were selected from Appendix H, Cumulative Impact Scenario. Appendix H is included to provide the reader with a compilation and brief description of other ongoing or foreseeable future actions that could have impacts relating to those of the Valley Plan alternatives, thereby avoiding repetition in the Chapter 4 discussions of cumulative impacts.

Impacts of past projects are presented in a qualitative fashion in the cumulative impact analyses where relevant. For example, the cumulative impacts analysis for wildlife under Alternative 2 discusses the basic effects of past actions on wildlife habitat and populations both regionally and locally within the Valley and park from actions such as logging, mining, grazing, visitor-related development, and dam construction.

There are almost 50 ongoing and future projects presented in Vol. II, Appendix H, Cumulative Impact Scenario, of the *Draft Yosemite Valley Plan/SEIS*, and approximately 70 projects in the cumulative scenario for the *Final Yosemite Valley Plan/SEIS* (Vol. II, Appendix H). It is impractical to present in detail the impacts of every relevant project in the cumulative impact analysis. Consequently, the National Park Service has combined projects with similar impacts in the cumulative impacts analysis for purposes of presentation. For example, in the cumulative impacts analysis for wildlife under Alternative 2 (see Chapter 4, Environmental Consequences of the *Final Yosemite Valley Plan/SEIS*), several projects are identified as occurring in previously disturbed areas, including the Mariposa Creek Pedestrian/Bike Path, Repair and Rehabilitation of the Yosemite Valley Sewer Line, Highway 140 (El Portal Road) Improvements, YARTS, Mariposa Grove Roadway Improvement and Giant Sequoia Restoration, and O’Shaughnessy Compound Water System Improvements. Because these actions are occurring or would occur primarily in disturbed areas, they would have similar impacts on wildlife such as short-term disturbance and dispersal resulting from noise and human activity, and are therefore presented together rather than individually. However, the potential impacts of each of the relevant projects in the cumulative impact scenario were considered and assessed, and their contribution included in the impacts disclosed.

Cumulative impacts of other past projects are discussed where relevant in the various impact topics in Vol. IB, Chapter 4. The El Portal Road Improvement Project, an ongoing action, is included in the cumulative scenario (Appendix H) and addressed in cumulative impact analyses for many topics. For example, under Alternative 2, this project is highlighted in the cumulative impact analyses for water resources, wildlife, special status species, cultural resources, floodplains, Merced Wild and Scenic River, special-status species, transportation, scenic resources, and other impact topics.

90. Public Concern: The *Yosemite Valley Plan* should require the implementation of the Yosemite Falls Project.

“The project to redesign and re-landscape the visitor access areas at the base of Yosemite Falls which has been under development for the past three years should be completed as soon as possible. I would love to be able to take



my grandchildren and great grandchildren to the base of the Falls and share with them the breathtaking beauty and thrill which I remember enjoying some sixty-plus years ago.” (Individual, Mountain View, CA - #399)

“Yosemite Falls is one of the most beloved and awe-inspiring landmarks of Yosemite. I am writing to express support for the portion of Alternative 2 of the draft Plan that addresses the area at the base of Yosemite Falls. Currently, the visitor experience at Yosemite Falls is impaired because surrounding development intrudes on the natural setting, degrading both the beauty of the Falls and the environment. I support the project which will improve the approach to Yosemite Falls by providing better access and restoring degraded areas to more natural conditions.” (Individual, Ojai, CA - #464)

“Relandscape and restore the Lower Yosemite Falls area as described in Alternative 2 according to the detailed Design Consensus Plan prepared by the office of Lawrence Halprin in cooperation with the National Park Service and underwritten by The Yosemite Fund. This project should be among the first to proceed upon approval of a final Plan so as to serve as a model or symbol of the kinds of positive changes that the Plan describes.” (Individual, Lafayette, CA - #4499)

Response: Improvements at Lower Yosemite Fall (see Vol. IA, Chapter 2, Visitor Experience, Recreation) are proposed in the Preferred Alternative of the *Final Yosemite Valley Plan/SEIS*. This area has long been recognized as both one of the major scenic wonders in Yosemite Valley and as a hazardous and unaesthetic combination of heavy vehicle traffic, parking for cars and buses, heavy pedestrian and bicycle traffic, and inappropriate design. The Preferred Alternative calls for the removal of parking and restoration of the area, relocating restroom facilities, and redesigning trails and bridges.

600. Public Concern: The *Yosemite Valley Plan* should prohibit the implementation of the Yosemite Falls Project.

“I think Lower Yosemite Falls should be left as is unless there is an ecological reason to redesign the trails. If you remove the parking where will the tour buses park?” (Individual, Los Alimitos, CA - #5574)

Response: The Yosemite Falls Project is an important component of the *Final Yosemite Valley Plan/SEIS* and is included in all action alternatives. The visitor experience is significantly degraded by a number of existing conditions. The close proximity of the parking lot to the Lower Yosemite Fall detracts from the overall sense of arrival and enjoyment. Currently, trails are in disrepair; Lower Yosemite Fall is not accessible to people with mobility impairments; the bathroom is both inadequate for the volume of visitors to the area and antiquated. Each of the action alternatives would address these shortcomings. (See Vol. IA, Chapter 2 for a description of alternatives.)

Section 2.4 ~ Applicable Laws

Several individuals are concerned with the *Yosemite Valley Plan's* compliance with applicable laws, namely the Wild and Scenic Rivers Act (WSRA), the National Environmental Policy Act (NEPA), and the National Historic Preservation Act (NHPA). Comments regarding these laws, as well as the National Park Service's own enabling legislation (Organic Act), are covered in this section.

2.4.1 ~ The Wild and Scenic Rivers Act

Many actions proposed under the *Draft Yosemite Valley Plan/SEIS* are perceived by the public to be in conflict with the Wild and Scenic Rivers Act (WSRA). Citing the widening of Highway 140, the construction of a half-mile of new roadway in a meadow, and the construction of new parking at Camp 6, one respondent wonders, "Where in the Wild and Scenic Rivers Act is there a justification of any such development or expanding impacts?"

Other individuals need no such clarification; they are convinced the *Draft Yosemite Valley Plan* contradicts the letter and intent of WSRA and insist that the Park Service address this concern. Diverting Merced River water for irrigation and development is cited as a possible conflict with the WSRA, according to some. Other respondents believe the *Draft Yosemite Valley Plan* does not adequately protect the Merced River's Outstandingly Remarkable Values. "In some instances, undefined mitigation measures are proposed; however, WSRA requires that the ORVs be protected and enhanced, not degraded and mitigated," advances one conservation organization. "All of the actions proposed for El Portal, especially the new developments and the increase in human population of both visitors and employees, will have obvious adverse negative impacts on all of the ORVs except geological," adds another individual. The National Park Service should carefully study the effects these proposed actions may have on the Outstandingly Remarkable Values of the Merced River, according to many respondents.

169. Public Concern: The National Park Service should clarify how the *Yosemite Valley Plan* complies with the Wild and Scenic Rivers Act.

"Please demonstrate how the Valley Plan meets the requirements of the Wild and Scenic Rivers Act to protect the Merced River." (Individual, Malibu, CA - #1164)

"NPS has ignored the court. It first prepared an enormous but hollow Draft River Plan which gerrymandered protective corridors, created zones to allow new development, which lacked science, and otherwise subverted the requirements of the Wild and Scenic Rivers Act. The court ordered a plan to protect and enhance Yosemite, but NPS refused to produce it. It is frankly outrageous that the public should now be asked to comment on a Draft Valley Plan, which subverts the environmental laws of the United States, and the order of a court of law. We believe that the Secretary of the Interior should be denounced for this arrogant effort to increase development in Yosemite, and denounced again for his public claims that he is really about the business of restoring Yosemite. No claim could be further from the truth. This tax-funded development drive proposes the further widening of Highway 140 into the Merced River Channel, it proposes a dramatic widening of about half of the Valley's roadways, it proposes the construction of a half-mile of new roadway in a meadow (though a different half mile of roadway will be removed from another meadow, which has been great public relations for the plan). The plan proposes that the public approve the 20 to 30 acres of new parking added illegally at Camp 6 in Yosemite Valley last summer. We do not approve. Where in the Wild and Scenic Rivers Act is there a justification of any such development or expanding impacts? The answer is that there is none." (Public Hearing, Sacramento, CA - #20045)



Response: In 1987, Congress designated the Merced Wild and Scenic River, which flows through lands managed by the National Park Service, the U.S. Forest Service, and the Bureau of Land Management. Section 3(d)(1) of the Wild and Scenic Rivers Act (WSRA) requires the administering agency to develop a comprehensive management plan that addresses “resource protection, development of lands and facilities, user capacities, and the management practices necessary or desirable to achieve the purposes of this Act.” Section 10(a) of WSRA states that “management plans for any such component may establish varying degrees of intensity for its protection and development, based on the special attributes of the area”. In 2000, in response to a court order, the National Park Service completed the *Merced Wild and Scenic River Comprehensive Management Plan/Final Environmental Impact Statement* for the segments of the Merced Wild and Scenic River that flow through Yosemite National Park and the El Portal Administrative Site.

The Merced River Plan applies a consistent set of decision-making criteria and considerations composed of seven management elements: boundaries, classifications, Outstandingly Remarkable Values, the Section 7 determination process, the River Protection Overlay, management zoning, and the Visitor Experience and Resource Protection framework. The application of the seven management elements will allow the National Park Service to meet the requirements of the Wild and Scenic Rivers Act, including the requirement that comprehensive management plans address resource protection, development of lands and facilities and user capacities. All seven of the management elements will guide resource protection efforts and future development. User capacities are mainly addressed through the VERP process, river classification, the River Protection Overlay and management zoning. The *Merced River Plan’s* management elements guide the *Yosemite Valley Plan* in the type of development and levels of use allowed within and adjacent to the Merced River corridor in Yosemite Valley, Wawona, and the El Portal Administrative Site.

The *Yosemite Valley Plan* recognizes that “the Merced River...is central to the Valley’s scenery and ecological processes. The *Yosemite Valley Plan* protects and enhances the Merced River’s Outstandingly Remarkable Values primarily by removing development from the River Protection Overlay in Yosemite Valley, restoring areas along the river, and by prescribing actions that are consistent with the management zoning established by the *Merced River Plan*. The *Yosemite Valley Plan* action alternatives are consistent with the seven management elements of the *Merced River Plan*. Thus, the Yosemite Valley Plan complies with the Wild and Scenic Rivers Act by proposing alternatives that are based on the *Merced River Plan* and by proposing a host of specific actions that would protect and enhance river values.

The Merced Wild and Scenic River is described in Chapter 3, Affected Environment. Impacts to the Merced Wild and Scenic River are described in Chapter 4, Environmental Consequences. The *Yosemite Valley Plan* includes plates of the Merced Wild and Scenic River management zones in Yosemite Valley, Wawona, and the El Portal Administrative Site. The seven management elements of the *Merced River Plan* are described in detail in Appendix B to the *Yosemite Valley Plan*.

Note: One response is provided for Public Concerns #722 and #536 and placed following Concern #536.

722. Public Concern: The *Yosemite Valley Plan* should comply with the Wild and Scenic Rivers Act.

“According to the Wild and Scenic Rivers act (WSRA) the managing agency is required to identify and protect ORVs, the river and its immediate environments, and the water quality to fulfill other vital conservation purposes. Its purpose is to be a policy that complements our national policy of damming rivers with a policy that helps protect rivers. And that primary emphasis shall be given to protecting its aesthetic, scenic, historic, archaeological and scientific features. This means that biological resources are not limited to rare and unique or exemplary within a regional or national context, nor that they must be directly river related as NPS had interpreted. Biological ORVs includes biodiversity and productivity of species as well as their role in the ecosystem. All management of the

Merced WSR and its immediate environments, etc., is supposed to protect and enhance the identified ORVs for each section of the Merced. The Draft VP allows for adverse impacts on one section of the Merced WSR (e.g., El Portal) to be mitigated by protection of other ORVs on other sections (e.g., the Valley), falsely concluding overall impacts to be [often] beneficial. This creates a net loss of habitat, ecosystem, species, individuals, etc. and is not following the WSRA mandate to protect and enhance the Merced WSR ORVs. The out-of-valley sections are just as important to protect for their own unique ORVs that are not found in the Valley. The designation of WSR means that the whole river designated is protected, not one section protected at the expense of other section.” (Individual, El Portal, CA - #7026)

“Any scheme to supply more water for development in Wawona, which entails draining water from the South Fork of the Merced River, conflicts with the South Fork’s designated status as a Wild and Scenic River. The NPS proposal to take water directly from Biledo Spring, or indirectly by diverting water from Big Creek (which flows into the South Fork of the Merced River) would reduce flow in the river, especially during drought years. The Mariposa Grove of Big Trees could also be threatened by a diversion of water from Biledo Spring. What would a drought year of reduced water flow mean for that treasured resource?” (Non-Governmental Organization, Wawona, CA - #7882)

536. Public Concern: The *Yosemite Valley Plan* should not allow for the degradation of Outstandingly Remarkable Values.

“The DVP allows for the degradation of ORVs, in violation of WSRA. In some instances, undefined mitigation measures are proposed; however, WSRA requires that the ORVs be protected and enhanced, not degraded and mitigated.” (Conservation Organization, Yosemite, CA - #7883)

“All of the actions proposed in El Portal will not protect and enhance the ORVs in the El Portal section of the Merced WSR, but will impact them instead. All of the actions proposed for El Portal, especially the new developments and the increase in human population of both visitors and employees will have obvious adverse negative impacts on all of the ORVs except geological.” (Individual, El Portal, CA - # 7026)

Response: Each of the action alternatives in the *Final Yosemite Valley Plan/SEIS* is consistent with the guidance and direction provided by the management elements of the *Merced River Plan/FEIS*. The Merced Wild and Scenic River section of Vol. IB, Chapter 4, Environmental Consequences of the *Final Yosemite Valley Plan/SEIS*, analyzes the consistency of each of the alternatives with the *Merced River Plan*, including impacts to Outstandingly Remarkable Values, compatibility with segment classifications, and consistency with the management zoning and River Protection Overlay. However, it is recognized that individual actions can have beneficial impacts on certain Outstandingly Remarkable Values and adverse impacts on other Outstandingly Remarkable Values. The Methodologies and Assumptions section of Chapter 4 of the *Final Yosemite Valley Plan/SEIS* states:

“It is not atypical for Outstandingly Remarkable Values to be in conflict with each other—that an action (or the existing condition) has beneficial impacts with regard to one Outstandingly Remarkable Value and adverse impacts with regard to a different Outstandingly Remarkable Value. The *Merced River Plan/FEIS* recognizes this situation, and in the section on Criteria and Considerations (Chapter 11 of that document) it states: “Actions must protect the Outstandingly Remarkable Values, regardless of where the Outstandingly Remarkable Value is located. When Outstandingly Remarkable Values lie within the boundary of the Wild and Scenic River, the Outstandingly Remarkable Value must be protected and enhanced. When Outstandingly Remarkable Values are in conflict with each other, the net effect to the Outstandingly Remarkable Values must be beneficial.”

As discussed above, the *Final Yosemite Valley Plan/SEIS* complies with the guidance and direction provided in the *Merced River Plan*, and therefore complies with the Wild and Scenic Rivers Act. See the Merced Wild and Scenic River section of Vol. IB, Chapter 4, Environmental Consequences, in the *Final Yosemite Valley Plan/SEIS* for a full analysis of impacts to Outstandingly Remarkable Values associated with each of the alternatives. (This response also applies to the previous Public Concern #722.) (Also see response to Concerns #16 and #169.)



2.4.2 ~ The National Environmental Policy Act

Several respondents cite various reasons why they believe the *Draft Yosemite Valley Plan/SEIS* does not comply with the National Environmental Policy Act (NEPA). The construction of housing in Wawona, the relocation of the fire station, and the removal of the historic bridges are all mentioned by constituents as actions that violate the National Environmental Policy Act.

Each aforementioned action does not comply with the National Environmental Policy Act for unique reasons, according to various respondents. The construction of housing in Wawona does not abide by the National Environmental Policy Act because the National Park Service did not consider alternative sites that “would avoid or minimize” the potential adverse impacts of the project, according to a civic organization. The tradeoff between a catastrophic rockfall of extremely low probability and the certain development of existing or former meadowland has not been adequately evaluated as required by the National Environmental Policy Act, according to respondents who oppose the firehouse relocation. Noting that bridge removal will also require additional state and federal Clean Water Act (Section 404) permits, one respondent concludes, “Prior to certification of the SEIS, these formal NEPA and Section 404 integration processes must occur.”

456. Public Concern: The *Yosemite Valley Plan* should comply with the National Environmental Policy Act.

“The CEQA regulations that implement NEPA direct that EISs ‘shall provide full and fair discussion of significant environmental impacts and shall inform decision makers and the public of the reasonable alternatives which would avoid or minimize adverse impacts or enhance the quality of the human environment.’ 40 C.F.R. 1502.1. EISs ‘shall be supported by evidence that the agency has made the necessary environmental analysis.’ Id. Where incomplete information relevant to a project’s potential adverse impacts ‘is essential to a reasoned choice among alternatives and the overall costs of obtaining it are not exorbitant, the agency shall include the information in the environmental impact statements.’ 40 C.F.R. 1502.22(a). Federal agencies ‘shall ensure the professional integrity, including statements.’ 40 C.F.R. 1502.24. Agencies must also assure that EISs are prepared ‘concurrently with and integrated with environmental impact analyses and related surveys and studies required by the Fish and Wildlife Coordination Act (16 U.S.C. 661 et seq.), the National Historic Preservation Act of 1966 (16 U.S.C. 470 et seq.), the Endangered Species Act of 1973 (16 U.S.C. 1531 et seq.), and other environmental review laws and executive orders.’ 40 C.F.R. 1502.25(a). The SEIS for the draft valley Plan violates these requirements. Most importantly, neither the Valley Plan nor its SEIS considers alternative sites for the high-density housing project proposed for Wawona. This omission is demonstrably unreasonable, for three reasons: First, as previously noted, both the GMP and the Wawona Specific Plan forbid the placement of high-density residential development with Wawona. Hence, consideration of alternatives is not only reasonable, but necessary, to conform to these applicable regulations. Second, the SEIS admits that the housing project would cause significant adverse environmental impacts on Wawona and the South Fork Merced River’s Outstandingly Remarkable Values. NEPA specifically requires agencies to consider ‘alternatives which would avoid or minimize adverse impacts.’ 40 C.F.R. 1502.1. Hence, the Park Service must consider alternative sites that ‘would avoid or minimize’ this housing project’s adverse impacts on Wawona. Third, alternative sites for this proposed housing project do in fact exist outside the Park boundaries, in El Portal, Oakhurst, Yosemite West, Midpines and Mariposa.” (Civic Organization, Wawona, CA - #7549)

“It appears that a decision to relocate the Fire Station (and the Auditorium) predates this document. This is contrary to NEPA. There appears to be a tradeoff between a catastrophic rockfall of extremely low probability, structural protection such as north-side blast walls and sand traps, and the certain development of existing or former meadowland. NEPA requires that this tradeoff be evaluated in its entirety.” (Individual, Oakland, CA - #3835)

“We have carefully reviewed the SEIS and conclude that it is inadequate and does not fulfill the requirements of the National Environmental Policy Act (‘NEPA’). Because certain impacts will extend beyond the boundaries of Yosemite National Park (i.e., potential increases in the velocity of the Merced River water flow as a result of the proposed removal of historic bridges), we assert that pursuant to the California Environmental Quality Act (CEQA) a full Environmental Impact Report must be prepared. In addition, because of the inevitable alterations to the river

(with the proposed demolition of the historic bridges and the construction of new bridge(s) and roads, other state and federal permits will be required from the U.S. Army Corp. of Engineers (under Section 404 of the Clean Water Act), the U.S. Fish & Wildlife Service, the California Department of Fish & Game with involvement with the Federal Bureau of Land Management. Further, to the best of our knowledge, there has been no coordination or ‘consultation’ between the U.S. Department of Transportation, the U.S. Department of Army, and the U.S. Environmental Protection Agency as it relates to an integration of the NEPA and Clean Water Act Section 404 procedures in accordance with the May 1, 1993 Agreement. Prior to certification of the SEIS, these formal NEPA and Section 404 integration processes must occur.” (Business, San Diego, CA - #7884)

Response: The National Park Service is mandated by law to comply with the provisions of the National Environmental Policy Act (NEPA). The National Park Service methodology for quantifying impacts in terms of both NEPA and the National Historic Preservation Act (NHPA) is presented in Chapter 4, Environmental Consequences, of the *Final Yosemite Valley Plan/SEIS*. The implementing regulations for NEPA require agencies to estimate the intensities of impacts to the human environment, as well as the resultant intensity based on the implementation of mitigation measures (e.g., recordation). It is within this NEPA framework that terms such as “major,” “moderate,” and “minor” are used. The definitions for these terms as they apply to all impact topics, including cultural resources, are provided in this methodology section.

The National Park Service has considered a wide range of employee housing approaches and alternatives over the last several years. *The Draft Yosemite Valley Housing Plans* of 1992 and 1996 provide information regarding alternatives considered and evaluated during earlier phases of planning for employee housing. The Preferred Alternative in the Yosemite Valley Plan/FEIS would locate an additional 198 beds to Wawona. Other alternatives in the plan propose no new housing in Wawona and would distribute the 198 Wawona-designated beds called for in Alternative 2 to other areas in and outside of the park. Thus, the Yosemite Valley Plan/SEIS presents a range of housing alternatives for Wawona and other areas administered by the National Park Service. In addition, language has been added to Chapter 2 of the *Final Yosemite Valley Plan/SEIS* (under all action alternatives) that discusses agency strategies for meeting needs for employee housing. The National Park Service is committed to following the direction established by the Omnibus Parks and Public Lands Management Act of 1996 which seeks to reduce the government’s role in providing employee housing, while reserving the ability to provide housing when appropriate and necessary. Before constructing employee housing within Yosemite National Park, the National Park Service would encourage employees to find housing outside the park and would explore opportunities to reduce the government’s role in housing. However, since no opportunities exist at the present time, the Yosemite Valley Plan identifies areas under National Park Service jurisdiction where necessary employee housing can be located. Ultimately, factors such economic feasibility, functionality, and land-use compatibility would play an important role in the viability of locations outside National Park Service jurisdiction. For example, locations such as Oakhurst and Mariposa present issues of reasonable commuting time and distance for employees, depending on their work site.

The National Park Service disagrees with the statement that construction of housing in Wawona would significantly and adversely impact the Merced River Outstandingly Remarkable Values in the Wawona segment of the river. Impacts to ORVs in Wawona are fully described in Chapter 4, Impacts to the Merced Wild and Scenic River.

Readers should also see the response to concern #721 for clarification of the relationship between the *Final Yosemite Valley Plan/SEIS* and the Wawona Town Planning Area, Specific Plan.)

2.4.3 ~ The National Historic Preservation Act

A business representative proposes that the *Draft Yosemite Valley Plan*’s proposition to remove the historic bridges violates both the National Environmental Policy Act and the National Historic Preservation Act. “Demolition, as a major, substantial adverse impact cannot and should



not be characterized as ‘moderate’ and recordation and photo documentation as the proposed mitigation measure most certainly will not reduce the impact to a ‘minor’ level. At the very least, an examination of all other feasible mitigation measures, including retention, relocation, alteration in place, or reduction of the river bed beneath the bridges must be proposed and thoroughly analyzed in the SEIS,” according to this respondent.

648. Public Concern: The *Yosemite Valley Plan* should comply with the National Historic Preservation Act.

“The proposed standard ‘lowest level’ mitigation measures . . . will not mitigate the loss of three or more nationally significant 1920s - 1930s era constructed granite bridges (which are individually listed on the National Register of Historic Places) to a level below significance. Recordation and photo documentation rather than in-situ preservation of the historic resources, will not mitigate the loss to an acceptable level. Demolition, as a major, substantial adverse impact cannot and should not be characterized as ‘moderate’ and recordation and photo documentation as the proposed mitigation measure most certainly will not reduce the impact to a ‘minor’ level. At the very least, an examination of all other feasible mitigation measures, including retention, relocation, alteration in place or, reduction of the river bed beneath the bridges must be proposed and thoroughly analyzed in the SEIS. Without a full examination of all-feasible other mitigation measures including public comment as to their sufficiency, the SEIS does not adequately address the loss of, or the compensation for the historic resources identified in the SEIS. Consequently, the PA and EIS are inherently defective in content and do not comply with NHPA Section 106 requirements or NEPA.” (Business, San Diego, CA - #7884)

Response: The National Park Service methodology for quantifying impacts in terms of both the National Environmental Policy Act (NEPA) and the National Historic Preservation Act (NHPA) is presented in Vol. IB, Chapter 4, Environmental Consequences, of the *Final Yosemite Valley Plan/SEIS*. The implementing regulations for the National Environmental Policy Act require agencies to estimate the intensities of impacts to the human environment, as well as the resultant intensity based on the implementation of mitigation measures (e.g., recordation). It is within this National Environmental Policy Act framework that terms such as “major,” “moderate,” and “minor” are used. The definitions for these terms as they apply to cultural resources are provided in the methodology section, Vol. IB, Chapter 4.

There is a clear distinction between assessment of impact under the National Environmental Policy Act and assessment of effect under the National Historic Preservation Act. While intensities of impact (under NEPA) may be reduced by documentary mitigation, the National Park Service acknowledges the continued adverse effect (under NHPA) to historic properties. Hence, mitigation measures such as photodocumentation are not intended to reduce the level of effect under NHPA to a level considered “not adverse.” The National Park Service has consulted (and reached concurrence) with the California State Historic Preservation Officer and the Advisory Council on Historic Preservation regarding this methodology.

The National Park Service has relied on independent hydrologic studies (Jackson and Smillie 1997; Madej 1991; USDOT-FHA 1998) for the best-available information regarding the nature and severity of impacts that the historic bridges in Yosemite Valley cause to the hydrologic flow of the Merced River. The historic bridges in Yosemite Valley were evaluated based on the following factors: (1) the extent to which they each are causing significant and detrimental changes to the Merced River fluvial system, and (2) their importance and continuing use as a structure in the historically significant traffic circulation system. Bridges causing the most significant ecological degradation were considered for removal, especially in places where they are not critical as continuing links in the traffic circulation system. In situations where a bridge crossing is necessary and a historic bridge exists, priority consideration was placed on retaining that bridge. In other situations where a bridge crossing is not necessary, it was determined that redesigning the bridges would seriously degrade their integrity as historic structures. Under the Preferred Alternative, in the *Final Yosemite Valley Plan/SEIS*, the bridge causing the most

serious degradation, Sugar Pine, would be removed first, with subsequent monitoring and evaluation performed before any other bridges downstream would be removed.

Under the Wild and Scenic Rivers Act, the National Park Service is charged with maintaining whenever possible the free-flowing nature of the Merced River as it runs through Yosemite National Park. Section 7 of the Act (16 USC 1277) requires a rigorous process to ensure that proposed “water resources projects,” implemented or assisted by federal agencies within the bed and banks of designated rivers, do not have a “direct and adverse effect” on the values for which the river was designated. Water resources projects include hydroelectric projects, dams, water diversions, fisheries habitat and watershed restoration, bridges and other roadway construction or reconstruction, bank stabilization, channelization, levees, boat ramps, and fishing piers that occur within the bed and banks of a designated Wild and Scenic River (Interagency Wild and Scenic Rivers Coordinating Council 1999). Given the priority consideration for free-flowing river conditions, the National Park Service has not considered altering the river channel itself in order to maintain the viability of the historic bridges.

2.4.4 ~ The Organic Act of 1916

Many respondents support the Organic Act’s foundational mandates to protect the natural and cultural resources of Yosemite National Park while enhancing the visitor’s enjoyment of these resources. However, some people feel that the *Draft Yosemite Valley Plan* contradicts this edict.

225. Public Concern: The *Yosemite Valley Plan* should comply with the Organic Act of 1916.

“We fully support the foundational roots of the National Park Service as articulated in the Organic Act of 1916 which calls for protection of the natural and cultural resources while enhancing the visitor experience.” (Conservation Organization, Oakhurst, CA - #1435)

“At the Secretary’s direction, you are about to violate your own Organic Act on its two most basic counts: 1. You are required to protect the natural values unimpaired; this plan doesn’t do it. 2. You are required to provide for the enjoyment of the visiting public; this plan would have quite the opposite effect.” (Conservation Organization, Fresno, CA - # 7881)

Response: The National Park Service takes all aspects of its mission seriously, including both the responsibilities “to conserve... and to provide for the enjoyment.” as articulated in the Organic Act of 1916. The public has offered a wide range of opinions regarding the need to protect natural and cultural resources in Yosemite Valley, as well as provide for visitor access and use. As indicated in Chapter 1 of the *Final Yosemite Valley Plan/SEIS*, the National Park Service seeks to balance the five goals of the *General Management Plan* “to ensure both the long-term preservation and public enjoyment of Yosemite Valley.”

Consequently, resource protection is a key element in each of the action alternatives presented in the *Final Yosemite Valley Plan/SEIS*. For example, protection of the Merced River and associated resources such as riparian zones, meadows, and wetlands is emphasized throughout the plan, including the Preferred Alternative (Alternative 2). For information regarding the measures proposed to protect the Merced River ecosystem, as well as other important park resources, refer to Vol. IA, Chapter 2, in which highly valued resources as well as Alternative 2 are described.



Section 2.5 ~ Implementation

The implementation of projects proposed under the *Draft Yosemite Valley Plan* is a concern for many respondents. Including specific *Yosemite Valley Plan* implementation timelines is “the single most significant issue to our organizations,” according to a letter authored by a conservation group coalition. A binding timetable would guide future planners, this respondent continues. “Unless the Park Service and the public seize this opportunity to lock-in the size and direction of future development, this plan will likely end up on a shelf next to the GMP, a visionary document defeated by the inertia and shifting priorities of new administrations,” the organization concludes.

Similarly, the California Department of Justice would like to see a comprehensive implementation program included in the *Final Yosemite Valley Plan/SEIS*. “A detailed, comprehensive implementation program is the key to ensuring that the *Yosemite Valley Plan* actually accomplish its goals and directives,” the Department indicates.

The Department of Justice not only asserts that the *Yosemite Valley Plan* should explicitly link implementation activities to the goals of the plan but also believes the National Park Service should prioritize implementation activities based on its ability to accomplish these goals. The *Final Yosemite Valley Plan/SEIS* should also clearly specify when additional environmental review will be required for the implementation of specific projects, the Department submits.

Addressing a similar topic, a U.S. Representative believes the National Park Service should clarify which aspects of the Plan warrant further review and public input. “You have assured me that many of the elements of the plan which have engendered public controversy will continue to be subject to public review through several more steps in the planning process,” the representative writes. “Which elements of the plan fit into this category versus elements that you intend to implement as a result of the adoption of the Valley plan?”

A conservation organization makes a similar request. The group wishes to know which decisions can be implemented without further review or analysis and which will require additional review. The organization asserts that answering this question “will allow the agency to analyze the cumulative impacts of development at maximum limits.” In addition, this group believes that the National Park Service should implement the restoration, visitor facilities, and transportation aspects of the *Yosemite Valley Plan* simultaneously. The organization writes, “It makes the most sense for the National Park Service to proceed along all three lines concurrently, rather than making one group of stakeholders wait through years of employee housing projects before major transportation improvements are implemented.”

Several respondents request clarification on how the *Yosemite Valley Plan* restoration projects are prioritized. According to one person, “The draft YVP offers no explanation of why the restoration of the Church Bowl Picnic Area and the removal of the old sewer plant (which has not been a priority in the twenty years since the GMP first proposed it), for example, now take precedence over the restoration of Upper and Lower River Campgrounds, the Stoneman and South Ahwahnee Meadows, and the North Pines campground.”

In addition to prioritizing restoration projects, some respondents believe the National Park Service should complete an aggressive inventory and monitoring program prior to a *Yosemite Valley Plan* decision. Such a program “needs to be in place first to provide information critical to the planning process—not within five years after a Record of Decision. Under the direction of

practicing scientists, volunteers could certainly assist in gathering data,” according to the Madera County Board of Supervisors.

Many of the aforementioned suggestions for improvement are contained in the *Grand Canyon National Park General Management Plan*, according to one conservation organization. “The Grand Canyon GMP breaks all items into one of two phases, and proposes completing actions concurrently across the categories of transportation, visitor services, employee housing, and management support (which includes relocation and restoration of administrative facilities),” this group offers. “For each action item, the phasing schedule includes a cost estimate, anticipated funding source, estimated completion date, explanation of the action sequence, and an indication of whether additional NEPA compliance will be required.” This group proposes that the National Park Service use the implementation strategy of the *Grand Canyon National Park General Management Plan* as a model for *Yosemite Valley Plan* implementation.

Finally, the Mariposa County Board of Supervisors posits that the National Park Service decrease the level of manager discretion allowed under the *Yosemite Valley Plan*. The Supervisors’ request that the alternatives be revised to limit discretionary activities “which may occur in the future but which are not sufficiently delineated at the present time for the public to adequately comment on.”

Note: One response is provided for Public Concerns #116 and #292 and placed following Concern #292.

116. Public Concern: The *Yosemite Valley Plan* should contain specific implementation time lines.

“When the Park Service produces its final ‘Record of Decision’ on the Valley Plan, it should include a detailed description of how and when the various elements of the plan will be implemented. Neither Yosemite nor the public can afford to have yet another plan that sits on the shelf.” (Individual, Yountville, CA - #492)

“We can not fully embrace the current draft unless and until it contains a detailed timetable controlling the implementation and funding of future Park decisions. This timetable will become the document by which the public, the department of the Interior, and Congress will hold the Park Service accountable for the completion of this plan. This is the single most significant issue to our organizations—neither Yosemite nor the public can afford to have another good plan sit on the shelf. This timetable must bind future planners, rangers, and superintendents, who will be required to implement the bulk of the YVP years and decades after the issuance of the ROD. We commend the current Park administration and staff for their willingness to utilize the planning process to engage the public in a serious and open debate about the future of Yosemite. But it is unrealistic to believe that these groups of Park staff will stay the fifteen or twenty years necessary to implement this plan in full, and naive to think that future employees will necessarily share our common vision. Unless the Park Service and the public seize this opportunity to lock-in the size and direction of future development, this plan will likely end up on a shelf next to the GMP, a visionary document defeated by the inertia and shifting priorities of new administrations.” (Conservation Organization, San Francisco, CA - #4594)

292. Public Concern: The *Yosemite Valley Plan* should include a comprehensive implementation program.

“The Yosemite Valley Plan should include a more comprehensive implementation program. A detailed, comprehensive implementation program is the key to ensuring that the Yosemite Valley Plan actually accomplish its goals and directives. Although we recognize and understand that the Plan is a programmatic document, it does not include a sufficiently detailed discussion of how and when the various actions adopted to meet the goals will be implemented. While Appendix M describes a ‘conceptual three phase approach’ to implementation of specific projects, it is sorely lacking in detail. YVP Vol. II at II-73. There is no discussion of the basis upon which the various projects were divided into the three phases, no timelines to explain what actions will be implemented when,



and no explanation of how the NPS proposes to obtain the necessary funds for implementation.” (California Department of Justice, Sacramento, CA - #5430)

Response: Due to public comment, Vol. II, Appendix M has been modified in the *Final Yosemite Valley Plan/SEIS* to include detailed project sequencing. In the *Draft Yosemite Valley Plan/SEIS* Appendix M-Phasing was used as the starting point to develop the final sequencing for nine target project groups. These groups are made up of over 250 independent actions of the Preferred Alternative which are now linked in a logical sequence that relate to physical and operational connections. These linkages determine the order in which implementation will occur. For example, with a clear sequence of action determined it is now possible to see that in order to get the new visitor/transit facility on-line in Yosemite Valley, it is necessary to provide a location to maintain and store the shuttle fleet at the current National Park Service maintenance area (Fort Yosemite). In order to complete this action, among other things, it is necessary to relocate National Park Service operations and stable functions from that area. Before these functions can be relocated, replacement functions need to be built outside the Valley. Before refining the phasing plan to the project sequence level, it was not readily apparent that building these replacement facilities was a necessary action to the completion of a full-functioning visitor/transit center. See Appendix M, Sequencing Plan, for more project sequencing information. (This response also applies to the previous Public Concern #116.)

(Also see responses to Concerns #293 and #294.)

293. Public Concern: The *Yosemite Valley Plan* should explicitly link implementation activities to the goals of the plan.

“The Plan fails to link the implementation activities to the goals of the Plan, thus there is no guarantee that the limited resources available for implementation will be spent in a manner to ensure that the most important projects are commenced first.” (California Department of Justice, Sacramento, CA - #5430)

Response: In the *Final Yosemite Valley Plan/SEIS*, actions called for in the Preferred Alternative intend to accomplish the goals and criteria established in Vol. IA, Chapter 1, Purpose and Need, of the *Final Yosemite Valley Plan/SEIS*. Sometimes when projects are viewed independently, they may or may not seem to directly accomplish the plan’s goals, but often these independent actions are interim steps to implement major projects that do in fact encompass the goals. For example, in order to meet the criteria to “make high-quality interpretive and educational facilities and services available for all Valley visitors,” it becomes important to update and modernize the existing level of interpretive services currently being provided in the Valley. Many of the independent actions begin to meet these particular criteria. However, another action, such as relocating park operational functions out of the Valley District Building seems unrelated to enhancing interpretation and education until the major project that follows this action is completed. Conversion of the Valley District Building to a museum for park visitors would directly meet the criteria and the goal of both the *Yosemite Valley Plan* and the park’s *General Management Plan* to “Promote visitor understanding and enjoyment.” Also see Vol. II, Appendix M, Sequencing Plan, for more details on project sequencing.

(Also see responses to Concerns #292 and #294.)

294. Public Concern: The *Yosemite Valley Plan* should prioritize implementation activities based on their ability to accomplish the goals of the Plan.

“Appendix M should be significantly revised to prioritize implementation activities based on how successful they will be at accomplishing the goals of the Plan to reclaim priceless natural beauty, to allow natural process to prevail and to markedly reduce traffic congestion.” (California Department of Justice, Sacramento, CA - #5430)

Response: The *Final Yosemite Valley Plan/SEIS* contains action items in the Preferred Alternative which are linked either physically or functionally to meet the goals and criteria established in the plan. The priority and order for the implementation of projects would be based on physical and operational

sequencing, funding, and additional regulatory compliance if necessary. All proposed actions help to achieve the goals and criteria established in Vol. IA, Chapter 1, Purpose and Need, of the *Final Yosemite Valley Plan/SEIS*.
(Also see responses to Concerns #292 and #293.)

290. Public Concern: The *Yosemite Valley Plan* should clarify when additional environmental review will be required for implementation of specific projects.

“The Yosemite Valley Plan should more clearly specify when additional environmental review will be required for implementation of specific projects. The Draft Yosemite Valley Plan contemplates that a number of site-specific construction projects will be undertaken in the Valley, including the construction of new lodging units, visitor center facilities, facilities to service transit and shuttle bus operations, and rerouting of roads. Because It addresses land use allocation for the entire Valley, the Plan is necessarily general in its level of analysis of the myriad projects evaluated. Some of these site-specific projects, however, while they may be ultimately beneficial to the environment of the Valley as a whole, may result in substantial localized impacts which need to be evaluated and mitigated. Under NEPA, site-specific implementation of projects called for in the Plan may require more detailed analysis, specific to the particular resources affected. Other than providing a few examples for which further review ‘may’ be required however, the draft Plan, however, does not specify when and under what circumstances further site-specific analysis will actually occur. YVP Executive Summary (‘ES’) at I-10; see also YVP ES at 2-23, YVP Vol. IA at I-14. Accordingly, it is difficult to determine whether the Plan will ultimately result in adequate analysis to enable the public and decision-makers to understand and fully evaluate the environmental consequences of the proposed actions. The Plan could be greatly improved by clearly identifying the actions for which the NPS will conduct additional specific analysis, and distinguishing them from the actions for which the NPS believes the more general level of analysis included in the Yosemite Valley Plan is adequate.” (California Department of Justice, Sacramento, CA - #5430)

Response: Some of the action alternatives in the *Final Yosemite Valley Plan/SEIS* are more fully developed than others with design level details for specific elements. Some projects are not as fully developed and would require additional planning and environmental analysis prior to implementation. The appropriate level of compliance and studies would be determined and accomplished on a project-by-project basis. Vol. II, Appendix M, Sequencing Plan, provides a general time line for project implementation and additional details regarding the need for future environmental compliance.

365. Public Concern: The *Yosemite Valley Plan* should clarify which aspects of the plan warrant further review and public input.

“A document that shows which elements of the plan may be implemented with the adoption of the Valley Plan, and which take further public review and comment would be helpful. You have assured me that many of the elements of the plan which have engendered public controversy will continue to be subject to public review through several more steps in the planning process. Which elements of the plan fit into this category versus elements that you intend to implement as a result of the adoption of the valley plan?” (U.S. Representative, Fresno, CA - #2951)

Response: At this time it is difficult to determine which projects will require further environmental compliance and associated public review. The next step in the planning process—the development of specific site design—would determine the need for and level of additional planning compliance and environmental review. Currently, it is anticipated that most regulatory compliance for actions taking place in Yosemite Valley are complete, unless:

The proposed actions extend beyond the land areas identified and analyzed in the *Final Yosemite Valley Plan/SEIS*

The proposed actions involve a substantive change in location, function and capacity from that discussed in the *Final Yosemite Valley Plan/SEIS*



Previously unknown resources are discovered, such as an archeological site or a threatened or endangered plant or animal species

The National Park Service is committed to continued public involvement as the *Yosemite Valley Plan* is implemented. Site designs will be made available to the public in order to come up with the best design solutions possible. See Vol. II, Appendix M, Sequencing Plan, for more information. (Also see response to Concern #290.)

469. Public Concern: The *Yosemite Valley Plan* should identify decisions that can be implemented without further review or analysis.

“The Park Service must identify the decisions that can be implemented without further review or analysis pursuant to the National Environmental Policy Act of 1969 (NEPA) and those which will require additional review, such as new construction at Yosemite Lodge. This approach will allow the agency to analyze the cumulative impacts of development at maximum limits. If this approach is not adopted, and the Park Service instead views the YVP as committing it to full build-out of development projections, the adequacy of the EIS becomes less certain. Specifically, every action alternative proposes at least 141 new rooms at Yosemite Lodge, which may contradict Judge Breyer’s holding that the Park Service must rigorously explore alternatives created by the 1997 flood, including building fewer Lodge units, siting lodging elsewhere in the Park, and abstaining from building replacement facilities at all.” (Conservation Organization, San Francisco, CA - #4594)

Response: There are numerous actions identified in the Preferred Alternative of the *Final Yosemite Valley Plan/SEIS*, some of which may require further National Environmental Policy Act review and analysis. The construction of the new visitor/transit center is a good example of a complex project with multiple project links that may require additional regulatory compliance. Until a site-specific design plan is prepared for the Yosemite Village area, it is difficult to determine if additional National Environmental Policy Act compliance is necessary. Regardless of the need for additional National Environmental Policy Act compliance, as site designs are prepared, the design alternatives would be made available to the public.

Also see Vol. II, Appendix M, Sequencing, for additional information. (Also see response to Concern #365.)

502. Public Concern: The National Park Service should implement the restoration, visitor facilities, and transportation aspects of the *Yosemite Valley Plan* simultaneously.

“Our organizations therefore strongly believe that the timetable must go forward with simultaneous projects relating to restoration, visitor facilities, and transportation. These three dilemmas drove the draft plan, and they are the three issues the public cares most about. It makes the most sense for the Park service to proceed along all three lines concurrently, rather than making one group of stakeholders wait through years of employee housing projects before major transportation improvements are implemented. Thus, for example, in year one after the ROD is signed, we believe that the NPS should: begin giving people who park at satellite lots a financial incentive for taking the bus to the Valley; move forward with building new campsites at Tenaya Creek, Upper Pines, South Camp, or Camp 4; begin planning for a new Visitor’s Center and consolidated bus and car parking at Yosemite Village.” (Conservation Organization, San Francisco, CA - #4594)

Response: The *Yosemite Valley Plan* would be implemented with a variety of concurrent actions (i.e., restoration, development of visitor and transportation facilities). In some cases, due to physical and operational links, implementation requires removal and replacement of administrative functions outside of Yosemite Valley to make way for improved visitor facilities within the Valley. In many cases, restoration to natural conditions is often the last piece to be completed. For example, the restoration of Upper and Lower Rivers Campgrounds would require the removal of utilities before the site can be restored. See Vol. II, Appendix M, Sequencing Plan, for more information on project sequencing.

507. Public Concern: The National Park Service should clarify the prioritization of *Yosemite Valley Plan* restoration projects.

"It is not at all clear why the Park Service has downgraded the priority of the plan's major restoration projects. In addition to two important projects, Phase 1 includes seven small projects, many of which do not involve highly valued resources, none of which are time-sensitive, and which total an estimated \$1,833,000. The draft YVP offers no explanation of why the restoration of the Church Bowl Picnic Area and the removal of the old sewer plant (which has not been a priority in the twenty years since the GMP first proposed it), for example, now take precedence over the restoration of Upper and Lower River Campgrounds, the Stoneman and south Ahwahnee Meadows, and the North Pines campground. These latter projects represent the heart of the YVP's restoration effort--they should not be made to wait until the Church Bowl Picnic Area is restored." (Conservation Organization, San Francisco, CA - #4594)

Response: Vol. II, Appendix M in the *Final Yosemite Valley Plan/SEIS* has been modified to better explain the sequencing that will need to occur to be able to implement the *Yosemite Valley Plan*. For example, to fully restore Upper and Lower River Campgrounds the roads and utilities must be removed, but in order to remove the roads and utilities it is necessary to reroute utilities and reroute or reduce traffic volumes first. It may be possible to phase restoration projects incrementally, but it should be noted that some very important restoration projects must await construction, replacement, or relocation of other facilities. See Appendix M for more information on sequencing.

386. Public Concern: The National Park Service should complete an aggressive inventory and monitoring program prior to a *Yosemite Valley Plan* decision.

"Establish a sound scientific base of information that documents the resources that are protected and preserved in the park, the condition of those resources; any changes in condition over time; and actions needed to ensure preservation. According to National Park Service Director Robert Stanton, 'Preserving our natural resources far into the future now requires active and informed management based on sound science.' An aggressive Inventory and Monitoring Program needs to be in place first to provide information critical to the planning process—not within five years after a Record of Decision. Under the direction of practicing scientists, volunteers could certainly assist in gathering data." (Madera County Board of Supervisors, Madera, CA - #4284)

Response: According to NPS-77, *Natural Resource Management Guidelines* (1991), "Monitoring is the systematic collection and analysis of resource data at regular intervals, in perpetuity, to predict or detect natural and human-induced changes, and to provide the basis for appropriate management response. Inventory is the process of acquiring, managing, and analyzing information on park resources, including but not limited to the presence, distribution, and condition of plants, animals, soils, water, air, natural features, biotic communities, and natural processes." Since inventory and monitoring are ongoing processes, they cannot be completed before the *Yosemite Valley Plan*. However, Yosemite National Park has established and continues to carry out a wide variety of inventory and monitoring programs in the park. Specific recent studies have included:

Delineation of the floodplain in Yosemite Valley following the January 1997 flood

Spotted owl surveys conducted by the U.S. Fish and Wildlife Service

Fisheries census by the California Department of Fish and Game and the U.S. Fish and Wildlife Service

Rockfall studies by the U.S. Geological Survey

Flood and hydrologic studies by the National Park Service Water Resources Division

Effects of woody debris and river restoration on aquatic systems by the U.S. Fish and Wildlife Service



Ongoing evaluation of impacts from bridges and vegetation loss along the Merced River by the National Park Service and the U.S. Geological Survey Biological Resource Division

Vegetation recovery following restoration of riparian, meadow, California black oak woodland, and upland forests in Yosemite Valley

Monitoring throughout the park of the effects of prescribed fires

Air and water quality monitoring

Survey and mapping of soils throughout the park

Survey and mapping of vegetation throughout the park

Ongoing monitoring of rare, threatened, and endangered species

These past and ongoing inventory and monitoring programs were used in the development of the alternatives addressed in the *Final Yosemite Valley Plan/SEIS*. In addition, studies and inventory and monitoring results in similar ecosystems and habitats in adjacent areas managed by the National Park Service, U.S. Forest Service, and other agencies have been incorporated into the recommendations included in this document.

See relevant sections of Vol. IA, Chapter 3, Affected Environment; Vol. IB, Chapter 4, Environmental Consequences; and the Bibliography (Vol. IB) for references to specific studies.

501. Public Concern: The National Park Service should use the implementation strategy of the *Grand Canyon National Park General Management Plan* as a model for *Yosemite Valley Plan* implementation.

“Our organizations are merely requesting that the Park Service give Yosemite the same treatment that Grand Canyon National Park received in 1995. The NPS’s General Management Plan for Grand Canyon contains an extensive phasing plan organized almost identically to what we have proposed for the YVP. The Grand Canyon GMP breaks all items into one of two phases, and proposes completing actions concurrently across the categories of transportation, visitor services, employee housing, and management support (which includes relocation and restoration of administrative facilities). For each action item, the phasing schedule includes a cost estimate, anticipated funding source, estimated completion date, explanation of the action sequence, and an indication of whether additional NEPA compliance will be required.” (Conservation Organization, San Francisco, CA - #4594)

Response: Vol. II, Appendix M has been modified to expand and explain project sequencing and costs for actions called for in the Preferred Alternative in the *Final Yosemite Valley Plan/SEIS*. The Grand Canyon model was not specifically used; however, project links have now identified the potential need for additional compliance with provisions of the National Environmental Policy Act. (Also see response to Concerns #365 and #469.)

560. Public Concern: The National Park Service should decrease the level of manager discretion allowed under the *Yosemite Valley Plan*.

“It is our opinion that all of the alternatives, including the preferred alternative, as was the case with the ‘Merced Wild and Scenic River plan,’ contain too many unknown discretionary actions which may be taken by the Park Service. Because of the numerous discretionary actions contained within each alternative, it is very difficult for the public to comment meaningfully on the alternatives. As an example, it is unclear when and under what circumstances historic structures may or may not be removed. We respectfully request that the alternatives be tightened up in terms of discretionary activities which may occur in the future but which are not sufficiently delineated at the present time for the public to adequately comment on.” (Mariposa County Board of Supervisors, Mariposa, CA - #6060)

Response: Because of the breadth of actions called for in the *Final Yosemite Valley Plan/SEIS* there is a necessary range in the level of detail provided. Under the National Environmental Policy Act (NEPA), it is appropriate to focus on those issues that are ripe for decision and to defer additional detail to tiered compliance (40 C.F.R. Section 1508.28). In addition, the National Park Service conservatively estimated impacts stemming from actions to disclose the most severe impacts that could occur. For example, development areas or zones were delineated where substantial facilities construction or replacement would occur. Because site-specific design would be conducted in the future, the assumption was made, for purposes of impact analysis, that all areas inside the development zones would be adversely impacted by the development even though this may not ultimately be the case once facilities are sited on the ground.

For those elements of the Preferred Alternative that do not have a specific level of detail, general provisions are identified and future public involvement and environmental review is expected. The public would again have the opportunity to comment on those actions requiring further compliance under National Environmental Policy Act in the form of an environmental impact statement or environmental assessment. General provisions guiding these actions would include the goals of the *Final Yosemite Valley Plan/SEIS*, general mitigation measures identified in the *Yosemite Valley Plan*, and other applicable park plans and policies such as the *Merced River Plan*. Please refer to revisions in Chapter 1, Purpose and Need, and Appendix M, Sequencing in the final document that provide discussion and further commitments regarding future National Environmental Policy Act compliance associated with future site-specific planning and design activities. (Also see response to Concerns #365 and #469.)

Section 2.6 ~ Funding

The funds required for the restoration, construction, and demolition of facilities within Yosemite Valley elicit numerous comments from a broad range of respondents. Many people suggest that the National Park Service establish funding prior to commencing planning efforts. “While construction costs are fairly well supported, future operational costs are not assured. This approach is topsy-turvy to how most organizations fund new construction,” offers one business representative. Instead, the Park Service “should establish assured levels of funding first,” this person writes, rather than assume future administrative and congressional support will be available.

Addressing a similar topic, another respondent requests that the National Park Service include an analysis of funding sources in the *Final Yosemite Valley Plan/SEIS*. Such an analysis is necessary, this person offers, “so that the public is not misled about the consequences if future funding is withheld.” Other citizens believe the National Park Service should more aggressively seek private fund donations. “Fund raising is not addressed in the report at all and I think you need to develop and publish widely your Yosemite fund raising rules,” suggests this person.

While not exhorting the Park Service to actively seek private funds, one conservation organization does suggest they establish a strict policy regulating the uses of private funds. “In the absence of strong policies specifying that private donations confer no rights to the donor (such as the right to advertise or control developments),” the group writes, “the NPS could be placed under financial pressure by donors, which may run counter to the agency’s primary mission of leaving Park resources unimpaired.”

Another funding concern for many constituents is the perceived exorbitant costs of implementing the Preferred Alternative. One conservation organization asks the National Park Service to explain the rationale behind restoration costs for Phase 1 of *Yosemite Valley Plan*



implementation. Noting that less than two percent of the total implementation budget is slated for restoration projects, this group suggests that such a small investment “could be interpreted to suggest that the Park Service places a higher priority on development and construction activities than ecological restoration projects.” Using the same numbers, a resident of California comes to the same conclusion. “Instead of a vision of restoration, we have a vision of construction,” this individual laments.

Emergency funds congressionally allocated after the January 1997 flood also draw attention from the public. Many perceive the National Park Service’s rush to complete this plan as being driven by a fear of losing the unspent portion of these funds. “It was stated that if this plan was not approved by the end of this year that the Park Service would lose \$110 million in flood money and \$60 million in gate fee money,” a speaker at a public hearing states. “That is a real concern, to sell out Yosemite because you don’t want to lose the money.” This person believes the National Park Service should not consider the loss of flood damage funds as a criterion for determining the decision and implementation timelines of the *Yosemite Valley Plan*.

Note: One response is provided for Public Concerns #359 and #362 and placed following Concern #362.

359. Public Concern: The National Park Service should establish assured levels of funding prior to planning for Yosemite Valley.

“Missing from the Plan are the sources of funds available to pay for construction and ongoing operation. . . Stated assumptions by current park planners is that the fee demonstration program, combined with funds previously allocated to pay for repair of flood damage, and administrative and congressional support for change, will generate adequate funds to pay for implementation of the Yosemite Valley Plan. The current plan, like its predecessors, is a wish list. The NPS plan, when finalized, will be cemented into public consciousness as a reality, but in truth while construction costs are fairly well supported, future operational costs are not assured. This approach is topsy-turvy to how most organizations fund new construction. Instead of planning first, then seeking funding to fit the Plan, the NPS should establish assured levels of funding first (from fee demo, add-ons and congressional allocation), then plan finance-able actions.” (Business, Yosemite National Park, CA - #3962)

362. Public Concern: The *Yosemite Valley Plan* should include a detailed analysis of funding sources.

“More detailed analysis of funding sources and realistic assessments of their feasibility should be included so that the public is not misled about the consequences if future funding is withheld.” (Business, Yosemite National Park, CA - #3962)

Response: The *Yosemite Valley Plan* identifies possible funding sources for project implementation. The targeting of funding sources is based on anticipated program opportunities and project eligibility. Several *Yosemite Valley Plan* projects, such as the Yosemite Lodge project and the restoration and redesign of several Valley campgrounds, already have funding available, as a result of the 1997 flood response. The National Park Service received \$176 million as part of the Emergency Supplemental Appropriations Act (Public Law 105-18) to repair flood-damaged roads, facilities, and infrastructure. Money specifically appropriated for the above-mentioned projects has been set aside until a Record of Decision for the *Yosemite Valley Plan* can be reached.

The new National Park Service Fee Demonstration program has the potential to provide approximately \$12 million a year toward *Yosemite Valley Plan* project implementation. Other funding sources include the National Park Service Line Item construction program, which requires projects to compete servicewide for funding consideration. The concession Capital Improvement Fund, grants from private philanthropy and the Federal Lands Highway Program are other potential funding sources that would be

considered to implement *Yosemite Valley Plan* projects. See Vol. II, Appendix M of the *Final Yosemite Valley Plan/SEIS* for more information on available funding sources.
(This response also applies to the previous Concern, #359.)

Note: One response is provided for Public Concerns #436 and #500 and placed following Concern #500.

436. Public Concern: The *Yosemite Valley Plan* should include the National Park Service's fund raising rules.

"Fund raising is not addressed in the report at all and I think you need to develop and publish widely your Yosemite fund raising rules—what is and isn't acceptable, who is and isn't raising money on your behalf, what you are going to use the funds for and how it differs from government funding, and you need to get aggressive about increasing your private funding and your use of volunteers. I was very surprised by the small amount of money you are raising privately—the newsletter I saw said about \$4 million. With 3.5 [million] well-off visitors each year, you are sitting on a gold mine. You don't need to do the gold rush, but deliberate, thoughtful fund raising is a resource not to be ignored." (Individual, Washington, DC - #4853)

500. Public Concern: The National Park Service should establish a policy regulating the use of private funds for Yosemite National Park developments and services.

"Our organizations strongly encourage the Park Service to establish a strict policy regulating the uses of private funds for Park developments or services. In the absence of strong policies specifying that private donations confer no rights to the donor (such as the right to advertise or control developments), the NPS could be placed under financial pressure by donors, which may run counter to the agency's primary mission of leaving Park resources unimpaired." (Conservation Organization, San Francisco, CA - #4594)

Response: This concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan*. The National Park Service has specific policies that regulate fundraising, the use of donated funds, and donor recognition. In addition to broad direction found in the *National Park Service Management Policies*, specific detailed guidance is provided in *Director's Order #21, Donations and Fundraising* (approved September 18, 1998).

(This response also applies to the previous Concern, #436.)

503. Public Concern: The National Park Service should explain the rationale behind restoration costs for Phase 1 of *Yosemite Valley Plan* implementation.

"The draft plan fails to explain to the public why Phase 1, which is estimated to cost more than \$213 million, includes less than \$4 million for ecological restoration (less than two percent of the total). Although restoration projects of course cost less than construction activities, the disparity in these figures, in the earliest and most important phase of the plan, could be interpreted to suggest that the Park Service places a higher priority on development and construction activities than ecological restoration projects." (Conservation Organization, San Francisco, CA - #4594)

"Here is the economic analysis we did of your numbers for Alternative 2 (Appendix M). 43% of the total cost went for employee housing. Wow! As we mention later, moving employees out of the valley probably has more pros than cons, but it is a close call. If moving the employees out will cost 43% of the total tab—forget it. Next, we looked at restoration, 4.9% of the total. That sent a bad message all by itself. Instead of a vision of restoration, we have a vision of construction." (Individual, Oakhurst, CA - #3379)

Response: Restoration projects cost less than construction projects; therefore, it may not be appropriate to compare costs to indicate priorities. To be able to restore 180 acres of Yosemite Valley, it is necessary to spend money constructing replacement facilities outside of the Valley, especially employee housing. To improve visitor services and accommodate transportation systems, there are significant construction costs



for work that must be done before restoration projects can be started. Construction of replacement functions will often lead to more restoration (e.g., removing roads from meadows requires reduced traffic volumes and relocation of roads, thereby making transportation projects predecessors to road removal). See Vol. II, Appendix M, Sequencing Plan, of the *Final Yosemite Valley Plan/SEIS* for more information.

465. Public Concern: The National Park Service should not consider the loss of flood damage funds as a criterion for determining the decision and implementation timelines of the *Yosemite Valley Plan*.

“We heard at the Board of Supervisors meeting Tuesday, it was stated that if this plan was not approved by the end of this year that the Park Service would lose 110 million dollars in flood money and 60 million dollars in gate fee money. That is a real concern, to sell out Yosemite because you don’t want to lose the money.” (Public Hearing, Fresno, CA - #20503)

Response: The source or availability of funding is not driving the decision making in the Yosemite Valley planning effort or the timeline for its completion. Many projects funded by the Emergency Supplemental Appropriations Act (Public Law 105-18) are included in the *Final Yosemite Valley Plan/SEIS* and will not proceed until a Record of Decision is signed. However, the Emergency Supplemental Appropriations Act funding is not tied to any fiscal year and does not expire unless directed by Congress.

Section 2.7 ~ Public Participation and Coordination

This section contains an analysis of public comment regarding the public participation process for the *Draft Yosemite Valley Plan/SEIS*. Concerns about public involvement, the weighing of constituencies, public meetings, and response to public comment follow. The section concludes with those concerns involving National Park Service coordination with individuals, groups, and other government agencies.

2.7.1 ~ Public Involvement

Numerous individuals, agencies, and organizations urge the National Park Service to extend the public comment period for the *Draft Yosemite Valley Plan/SEIS*. One individual, noting that the majority of items listed under the “Make Your Comments Count” section are extremely time consuming, exhorts the National Park Service for assistance. “Based on the level of participation that you are asking the public to shoulder in this process, the public comment period should be extended to one full year,” this person proposes, “and the Park Service should conduct public workshops to accomplish these objectives.”

Several respondents not only ask for an extension of the comment period but also request the deadline be set after the Merced River Plan’s Record of Decision. “Given the complexity of the Valley plan alternatives and especially since the Merced River Plan . . . has not been formally approved, the July 7, 2000, deadline for comments on the *Yosemite Valley Plan* is unreasonable,” one person charges, “I urge you to extend the deadline for comments on the *Yosemite Valley Plan* for an additional 90 days following final approval of the *Merced River Plan*.” Another respondent, citing the same reasoning, requests a deadline 120 days after the *Merced River Plan*’s Record of Decision.

Invoking similar concerns, several respondents request that the National Park Service extend the date of its final decision on the *Yosemite Valley Plan*. Given the administrative and political exigencies associated with an election year, many constituents feel that the planning process is being rushed. “What has been most disconcerting to me has been the manner in which the Clinton Administration has attempted to force feed this proposal to the people of this country,” writes one U.S. Representative. Of those that suggest the Record of Decision date be extended, many reason that the Merced River Plan should be completed first. “It is impossible for the public to make fully informed comments during the Valley plan response period (April 7 - July 7, 2000) when the Valley plan is directly affected by a plan not yet completed. This timing renders the entire public comment process invalid,” insists one constituent.

Technical aspects of the public comment process need clarification, according to several respondents. A discrepancy in the close of comment date on two separate National Park Service web pages leads one constituent to ask for clarification. Another Internet related suggestion is to offer pure text versions of the *Draft Yosemite Valley Plan/SEIS* on the National Park Service’s web pages. “While it only took me a few minutes to download the PDF versions of these files,” this person shares, “it would have been far more useful if you also provided a pure text version (with graphs replaced with tables) for people who do not have ADSL or other relatively high-speed Internet connections.” Having a pure text version would make searching the text for keywords easier as well, this individual offers.



Finally, one citizen proposes that the National Park Service provide a concise executive summary of the *Draft Yosemite Valley Plan/SEIS*. “Your executive summary is much too long to review for a busy person,” this person remarks.

Note: One response is provided for Public Concerns #187 and #115 and placed following Concern #115.

187. Public Concern: The National Park Service should extend the public comment period for the *Yosemite Valley Plan*.

“Under the ‘Make Your Comments Count’ section . . . the balance of items listed would require a serious commitment of time and expertise to perform the necessary research to substantiate public comments. Based on the level of participation that you are asking the public to shoulder in this process, the public comment period should be extended to one full year, and the Park Service should conduct public workshops to accomplish these objectives.” (Individual, Malibu, CA - #1164)

“As we stated in our letter dated March 23, 2000 to your office relative to the ‘Merced Wild and Scenic River Plan,’ we believe that the fast tracking of the Valley Plan that the Federal Government has established for public review and adoption is far too compressed to allow either the Board of Supervisors or the general public sufficient time to review the documentation and make meaningful comments. We therefore request that the Park Service extend the deadline for public comments to be received by a minimum of 90 days.” (Mariposa County Board of Supervisors, Mariposa, CA - #6060)

“Extend the comment period on the Valley Plan for 120 days after a Record of Decision on the Merced River Plan.” (Non-Governmental Organization, Wawona, CA - #7882)

“Given the complexity of the Valley Plan alternatives and especially since the Merced River Plan, based on the Merced Wild and Scenic River Comprehensive Management Plan and Final Environmental Impact Statement, has not been formally approved, the July 7, 2000 deadline for comments on the Yosemite Valley plan is unreasonable. I urge you to extend the deadline for comments on the Yosemite Valley Plan for an additional 90 days following final approval of the Merced River Plan.” (Individual, Merced, CA - #9329)

115. Public Concern: The National Park Service should extend the final decision date of the *Yosemite Valley Plan*.

“I hope that in our haste to make sweeping changes we do not eliminate or change too drastically. Why not extend the final decision date and allow everyone interested a chance to participate in the final plans? I know Secretary Babbitt wants the plan to be finalized before his term is up, but let us not forget, those are decisions that must not be made quickly. We all want Yosemite to be here forever. Let us not make changes that cannot be undone.” (Individual, Roseville, CA - #341)

“I would like it [Record of Decision] to be postponed until we have the new administration, because we may have a new direction and some new people.” (Public Hearing, Los Angeles, CA - #20333)

EXTEND DECISION DATE UNTIL THE MERCED RIVER PLAN IS COMPLETED

“We believe the Park planning process is deeply flawed as the Plan states it is based on assumptions and data that is yet to be collected. The draft Merced River Management Plan (available for comment January 14 - March 24, 2000) is the foundation of the Yosemite Valley Plan, thereby authorizing its implementation; yet the Yosemite Valley Plan was developed and printed before the public comment period for the Merced River Plan had closed. Pursuant to National Environmental Policy Act (NEPA) and Council on Environmental Quality (CEQ) regulations, the River Plan is now undergoing modifications or revisions necessary to be considered legally adequate and will not be available for a Record of Decision until later this summer. It is impossible for the public to make fully informed comments during the Valley Plan response period (April 7 - July 7, 2000) when the Valley Plan is directly affected by a plan not yet completed. This timing renders the entire public comment process invalid.” (Business, Oakhurst, CA - #4276)

“What has been most disconcerting to me has been the manner in which the Clinton Administration has attempted to force feed this proposal to the people of this country. For Interior Secretary Bruce Babbitt to deny any extension to the diminutive time frame he has allowed the American people to comment on a plan that has been in the works for 20 years is a complete disgrace and an affront to the very democratic system he supposedly espouses. I find it appalling that I received in my office a copy of the Record of Decision on the Merced River Plan—a plan that is critical to the implementation of any management plan of Yosemite Valley—a mere four days before the expiration of the comment period on the YVP. Needless to say, neither my constituents nor I have had ample opportunity to fully read, comprehend and comment on a plan that will drastically change the way Yosemite National Park is managed in the future. I hope that, in the future, decisions that are so critical to Yosemite National Park and to its outlying communities will be made with the benefit of a more deliberate and adequate public comment process.” (U.S. Representative, Roseville, CA - #4292)

“The public should not be asked to be commenting on a Valley Plan until a valid Merced River Plan is completed and finalized. Today there is no valid Merced River Plan, so there should be no Valley Plan on the table, period.” (Public Hearing, San Jose, CA - #20533)

Response: The National Park Service does not view the planning process regarding the future of Yosemite Valley to have been conducted in haste. Planning for the Valley has not been confined to the current effort to develop a *Yosemite Valley Plan*, but has been an ongoing process dating back several years. The process has included preparation of the *Draft Yosemite Valley Housing Plan/SEIS* in 1992 (revised in 1996), as well as the *Draft Valley Implementation Plan/SEIS* released to the public in 1997. Public comment was solicited, received, and evaluated for each of these efforts.

The public has had ample opportunity to participate in the planning process both for the *Draft* and *Final Yosemite Valley Plan/SEIS*. The National Park Service implemented a comprehensive public involvement program during development of this document. For example, fourteen public meetings were conducted in the state of California, and additional meetings were held in the Seattle, Denver, Chicago, and Washington, D.C. areas during the public comment period for the draft document. Numerous meetings were held with interest and advocacy groups throughout the planning process. *Planning Update* newsletters were distributed to keep the public informed of planning progress and issues. In addition, public comments were accepted on the *Draft Yosemite Valley Plan/SEIS* from March 28, 2000 through July 14, 2000 far exceeding the agency’s minimum required comment period of 60 days.

Postponing the Record of Decision until the advent of a new administration would not provide tangible benefit to the planning process for Yosemite Valley. Although a change in administration may involve different people, the issues facing Yosemite Valley will remain the same, with challenging decisions to be made regardless of those involved.

(This response also applies to Public Concern #187.)

(Also see response to Public Concern #16)

51. Public Concern: The National Park Service should clarify the close of comment date for the *Yosemite Valley Plan*.

“Quick note on the introductory pages that I could get into: www.nps.gov/yose/planning.htm. This page states that the comment period ends on July 5th. OK; www.nps.gov/yose/planning/yvp.htm . . . states that comments must be received by July 7th. Do you mean to tell me that if I get my comment postmarked by July 5 and it doesn’t get to California by the 7th I’m S.O.L.? This is confusing. . . Let’s have less confusion, not more. A little consistency goes a long way.” (Individual, No Address - #30064)

Response: This comment is acknowledged. The National Park Service web site has been corrected to show July 7, 2000, as the end of the public comment period for the *Draft Yosemite Valley Plan/SEIS*. In mid-August it was discovered that the official Federal Register notice published by the Environmental Protection Agency announcing the availability of the *Draft Yosemite Valley Plan/FEIS* for review stated that comments were due by July 14, 2000. Therefore, comments received through July 14, 2000, were



included in the analysis of public comments (see the section on the *Draft Yosemite Valley Plan/SEIS* in Vol. IB, Chapter 5, Consultation and Coordination).

653. Public Concern: The National Park Service should offer pure text versions of the *Yosemite Valley Plan* on the Internet.

“While it only took me a few minutes to download the PDF versions of these files, it would have been far more useful if you also provided a pure text version (with graphs replaced with tables) for people who do not have ADSL or other relatively high-speed internet connections. With full documents in a single text file, it becomes fairly easy to use text-editor capabilities to search the files for keywords (something you can’t do with multiple web pages), and it is easier to justify storing the files on disk when the files are just simple text (and therefore much smaller), reducing the load on your servers.” (Individual, Palo Alto, CA - #3714)

Response: Initially, the *Draft Yosemite Valley Plan/SEIS* was available on the Internet as large PDF (picture display format) files that require the use of Adobe Acrobat for viewing. As a result of public comments, the National Park Service posted a text file (HTML) version of the full *Draft Yosemite Valley Plan/SEIS* on the web site so that the public could read the document and view the graphics online.

185. Public Concern: The National Park Service should provide a concise executive summary of the *Yosemite Valley Plan*.

“Your executive summary is much too long to review for a busy person. I suggest you rewrite it into a four or five page (at the most) document. I would then review and comment on specifics.” (Individual, Bakersfield, CA - #854)

Response: The National Park Service has provided a more concise Executive Summary in the *Final Yosemite Valley Plan/SEIS*. Please refer to the beginning of Volume IA of this document.

2.7.2 ~ Weighing of Constituencies

The *Draft Yosemite Valley Plan/SEIS* states on page III-2 that “all comments are treated equally and are not weighted by number, organizational affiliation, or other status of respondents.” One respondent feels that this statement contradicts another on page III-15: “The database was also used to track pertinent demographic information such as responses from special interest groups or federal, state, county and local governments.” If no comment is weighted more than another, this person wonders, then why does the National Park Service track demographics? “I would like an explanation of this contradiction,” this citizen remarks.

Another respondent, suspicious as well that all comments do not necessarily receive equal treatment, cites a remark allegedly made by the Secretary of the Interior: “Quote, ‘The problem with Yosemite is it’s got too many friends. I wish about 95 % of them would go home and shut up,’ end of quote, spoken by Bruce Babbitt, Secretary of the Interior, at the Commonwealth Club, March 27th, year 2000.” This speaker then asks, “I wonder who are the 5% that he listens to?” Alternative 2 would restrict access to large groups of people, according to this respondent, and Secretary Babbitt’s word are proof that the National Park Service is not giving equal consideration to public comments on this Plan.

Ignoring the National Park Service’s admonition that “all comments are treated equally” some respondents believe extra weight should be given to certain groups’ comments. One such respondent believes that the *Yosemite Valley Plan* should include the views of equestrians who use Yosemite Valley. Similarly, a U.S. Representative insinuates that the National Park Service should give more weight to the comments of gateway community residents. “I do not disagree that these planning efforts must have as much public input as possible,” the representative

relates. “However, the citizens most directly impacted by park planning efforts are those in the gateway communities that support park activities. For this reason, I anticipate that the park service will listen particularly closely to the comments received from the gateway communities.”

694. Public Concern: The National Park Service should clarify how public comments on the *Yosemite Valley Plan* are weighted.

“My final comment concerns what appears to be another contradiction. On page III-2, it says that all comments are treated equally and are not weighted by number, organization affiliation or other status of respondents. Then comes the contradiction on page III-15, where it says the ‘mailing list’ database was also used to track pertinent demographic information such as responses from special interest groups, or federal, state, county, and local governments. Then there is another contradiction on page III-16, where it says demographic coding combined with the public comment subject categories allows managers to focus on specific areas of public comment linked to type of respondent, geographic area and response method. I would like an explanation of this contradiction.” (Individual, Columbia, CA - #7149)

Response: The National Environmental Policy Act (NEPA) requires that the National Park Service consider all comments offered by the public on the *Draft Yosemite Valley Plan/SEIS* “both individually and collectively.” Public concern statements, which form a basic summary of public comment and are the primary focus of park management when considering public comment collectively, are formulated by reading each individual letter, coding each identifiably different concern in each letter to a topical database, and then using that database to identify the range of public concerns in the whole body of public comments. This process treats all comments equally, regardless of number, organizational affiliation, or other status of respondents.

The demographic information gathered from responses is another way of looking at the letters collectively, allowing managers to obtain a picture of certain general aspects of the responding public such as the geographic distribution of commenters, their affiliation with a government agency or private organization, and how different members of the public chose to offer their comments (e.g., by letter, fax, email, public testimony, etc.).

A more complete understanding of the process of content analysis of public comment letters and how the resulting information is used in planning and decision making can be obtained by reading the Public Involvement and Agency Consultation Section of Volume IA, Chapter 1; Chapter 5, Consultation and Coordination, in Volume IB; and in Volume III, Public Comment and Response, Introduction, Chapter 1, and Chapter 6.

221. Public Concern: The *Yosemite Valley Plan* should reflect the needs of all user groups in Yosemite Valley.

“Quote, ‘The problem with Yosemite is its got too many friends. I wish about 95% of them would go home and shut up,’ end of quote, spoken by Bruce Babbitt, Secretary of the Interior, at the Commonwealth Club, March 27th, year 2000. I wonder who are the 5 percent that he listens to? Could it be the thousands of Americans who will be displaced by Alternative 2? And who are these displaced visitors? Seniors, the disabled, low-income families with children, campers, rafters, hikers, climbers, swimmers, fisherman, and more. No, I rather doubt Mr. Babbitt is listening to this group of people.” (Public Hearing, Costa Mesa, CA - #20302)

Response: The *Yosemite Valley Plan* has been developed with the needs of all park visitors in mind. One way in which those needs were identified was through public involvement during both the scoping process and the formal public comment period. The National Park Service and the public are engaged through those processes in determining what levels of visitor accommodations are appropriate for the National Park Service to provide. Public feedback is highly valuable in refining the ways the National Park Service accomplishes its mission.

(Also see response to concern # 55.)



371. Public Concern: The *Yosemite Valley Plan* should include the views of equestrians who use Yosemite Valley.

“You failed to answer the question regarding if any equestrian people are on the panel that made, or is making the decision regarding equestrian traffic in Yosemite National park. I do not understand why names and addresses cannot and should not be given to the general public. My intent is to provide thoughts from the equestrian point of view. How can one be expected to make an intelligent decision if all the facts are not known? The panel must gather facts [on which] to base their decisions. I’m sure you (nothing personal intended) must feel I am or could be a thorn in your side. Trust me, that is not the case.” (Individual, No Address - #3825)

Response: Decisions regarding action elements of the *Final Yosemite Valley Plan/SEIS* are made by park management staff based upon analysis, evaluation, and public involvement. Stock use is addressed in the plan and comments from stock users and other special interest groups were fully considered during the public comment response analysis stage of planning.

385. Public Concern: The *Yosemite Valley Plan* should reflect the specific needs of gateway communities.

“You have detailed your activities presenting the planning document to the public in forums from Washington, DC to Seattle, on the theory that Yosemite National Park is indeed a national asset. I do not disagree that these planning efforts must have as much public input as possible. However, the citizens most directly impacted by park planning efforts are those in the gateway communities that support park activities. For this reason, I anticipate that the park service will listen particularly closely to the comments received from the gateway communities.” (U.S. Representative, Fresno, CA - #2951)

Response: As part of the *Final Yosemite Valley Plan/SEIS* planning process, and in response to public comments, the National Park Service has identified and analyzed in detail the expected impacts on the social and economic environment surrounding Yosemite National Park. These have been further considered in response to comments received during the public comment period. The socioeconomic impact analyses and their conclusions are presented in the Visitor Populations and Regional Economies Sections in Vol. IB, Chapter 4, Environmental Consequences. Vol. II, Appendix J of the *Final Yosemite Valley Plan/SEIS* also discusses the difficulties associated with projecting future visitor demand and visitation. As a result, the magnitude, duration, and type of impacts that can be reliably and reasonably determined is limited by the ability to accurately project visitation characteristics. Regardless, by identifying and evaluating the impacts to the surrounding counties and gateway communities, the National Park Service recognizes local needs and concerns and, where possible, defines processes to assist the counties’ future planning and development.

2.7.3 ~ Public Meetings

Public hearings to solicit public input on the *Draft Yosemite Valley Plan/SEIS* were held throughout California as well as in large cities across the nation. Several respondents offer suggestions for the improvement of this facet of public participation. Additional meetings are requested by many citizens. “Currently, your schedule includes Seattle . . . Denver . . . Chicago . . . and Washington, D.C. We would suggest adding to this list—Boston, New York City and/or Philadelphia, Miami, St. Louis, Dallas or Houston, and Phoenix,” proposes one respondent. One Paso Robles, California, resident decries the lack of proximal meetings: “I live in Paso Robles, California, and there is no meeting even close to this area! . . . The closest meeting would be Fresno, if I wanted to go there I’d be in the park!”

When scheduling additional meetings, the National Park Service should also consider location and public transportation accessibility, comments one respondent. A speaker at the public hearing in San Diego suggests improving outreach to students interested in national parks. “I’m

surprised there are not more students here,” this student attests. Including the meeting date and time in university newspapers and campus posters is one suggestion this individual presents.

199. Public Concern: The National Park Service should schedule additional *Yosemite Valley Plan* public meetings.

“In order that as much input as possible could be received on the Yosemite Valley Plan, we would encourage your traveling team to visit additional cities. Currently, your schedule includes Seattle . . . Denver . . . Chicago . . . and Washington DC. We would suggest adding to this list—Boston, New York City and/or Philadelphia, Miami, St. Louis, Dallas or Houston, and Phoenix.” (Individual, Amherst, MA - #213)

“My objection is to the Valley Plan meetings that are scheduled. I live in Paso Robles, California, and there is no meeting even close to this area! San Luis Obispo Co.? Hello, we’re neighbors? The closest meeting would be Fresno, if I wanted to go there I’d be in the park!” (Individual, Paso Robles, CA - #50)

Response: This concern is acknowledged; although scheduling public meetings is an important aspect of the planning process, it is outside the scope of the *Yosemite Valley Plan*. The National Park Service was not able to visit every site it wished to visit because of time constraints, budget, and staffing limitations. The four out-of-state venues visited were selected based on criteria that included (1) whether the site was a transportation hub, (2) the sites’ geographic distribution across the country, and, most importantly, (3) the sites were in cities from which the most scoping comments were received.

179. Public Concern: The National Park Service should consider location and public transportation accessibility when scheduling *Yosemite Valley Plan* public meetings.

“I would like to comment right now on the poor choice of location for the Oakland area public meeting. The location you have chosen is very difficult to get to by public transportation and is not at all central. It is important that these meetings be very accessible to the public, including the public that chooses to or must ride public transportation instead of driving. . . There are many other venues in the East Bay which are highly transit accessible. Please keep convenient location and transit accessibility among your highest priorities when planning such meetings in the future.” (Individual, Berkeley, CA - #443)

Response: This concern is acknowledged; although it is relevant to the planning process, it is outside the scope of the *Yosemite Valley Plan*. Many considerations, including public transit access, went into the process of selecting where to hold public meetings during the public comment period.

654. Public Concern: The National Park Service should provide more public outreach to students.

“But I also think that it would be excellent if you had more people of my age at these meetings, and considering that there are four universities in the area in the San Diego, I’m surprised there are not more students here. So perhaps that’s just because as a student I’m not reading the local paper that often. I do read my school newspaper, and I do read the posters around the campus and maybe at future sites, you might want to perhaps give more public outreach to students and to YMCAs, et cetera, areas where the younger people are populating.” (Public Hearing, San Diego, CA - #20444)

Response: This concern is acknowledged; however, although it is relevant to the planning process, it is outside the scope of the *Yosemite Valley Plan* itself. The National Park Service uses a variety of ways to inform the public about public meetings. These include press releases, advertisements in major newspapers and newspapers aimed at minority populations, notices to people on the park’s extensive mailing list, and the park’s web site. The park also works with various organizations to provide information to special interest groups. For example, the park provided information to the Yosemite Institute, which in turn worked to disseminate information to schools and students. The National Park Service will continue to explore new ways to inform the public about issues and planning in Yosemite.



2.7.4 ~ Response to Public Comment

Many individuals have questions of clarification regarding the National Park Service's responsibility to respond to public comment. Citing a previous request for information, one respondent proclaims, "requested data must be made available to the public in a more timely manner (two weeks or less)." Another individual believes that scoping comments were not addressed "adequately in either the response section or the rest of the plan document." The *Yosemite Valley Plan* should address all of the public concerns submitted during the scoping process, according to this citizen.

188. Public Concern: The National Park Service should provide timely responses to public information requests regarding the *Yosemite Valley Plan*.

"Given the sweeping proposals of the Valley Plan, the brief 90-day public comment period and the July 5, 2000 deadline for public comments, requested data must be made available to the public in a more timely manner (two weeks or less). . . If the Park Service and BRW are unable to resolve requests for information within two weeks of the date that any public request is submitted, then the Valley Plan has been prematurely released for public review and comment, and it should be retracted and revised to include critical data requested by the public. If this data cannot be readily provided, then the Park Service and BRW will have violated National Environmental Policy act requirements on a number of levels. This is a formal request for specific, targeted data related to the Valley Plan. The absence of such data is clear evidence to us that basic elements of the plan are deceptive, and therefore, many of its principal conclusions cannot be substantiated. Hence, a prompt and complete response is expected and will be appreciated." (Individual, Malibu, CA - #1164)

Response: This concern is acknowledged, and the National Park Service and the Yosemite Valley planning team have made every effort to provide timely responses to public information requests.

337. Public Concern: The *Yosemite Valley Plan* should address all of the public concerns submitted during the scoping process.

"My scoping comments and those of others were not replied to adequately in either the response section or the rest of the plan document. I will list a few of the non-responses below. There was no reply to my comment about the stunning inconsistency of advertising Yosemite Park in an automobile magazine when the sheer number of visitors and especially the number of automobiles is agreed to be a problem in the park. There was lack of clarity and lack of adequate reply to comments about the transportation plan. No reason was given for not using trams, or open air trailers. Neither the plan nor any response states the size, numbers or fuel source of buses to be used. (Reading between the lines one surmises that more large diesel buses are in the planners' mind—but not in the printed plan despite its extraordinary size)." (Individual, Menlo Park, CA - #3564)

"I do hope that the thousands of public comments that you receive will be diligently used to rewrite the YVP, resulting in a much improved Plan." (Individual, El Portal, CA - #9013)

Response: Scoping is a public process used early in the National Environmental Policy Act (NEPA) process to determine the range of issues to be addressed in the environmental impact statement. Comments received during scoping for the *Draft Yosemite Valley Plan/SEIS* were used to identify important issues and de-emphasize or eliminate issues of lesser relevance or importance. This information sets the stage for the subsequent planning process, including development of alternatives and analysis of impacts.

Normally, a draft plan would not include response to public comments. Providing responses to individual public scoping comments would be premature, as planning and analysis have yet to take place. In addition, agency responses to public input received during project scoping are not required as part of the NEPA process. Instead, a summary of issues identified during the scoping process and subsequent public input is presented in Vol. IA, Chapter 1, Purpose and Need, of the *Final Yosemite Valley Plan/SEIS*.

In the case of the *Draft Yosemite Valley Plan/SEIS*, generalized public comment statements and responses were included because public comments were received on various preceding, incomplete planning efforts that had been reanalyzed and incorporated into the draft plan.

2.7.5 ~ Coordination and Consultation

Numerous laws and regulations require federal agencies to coordinate planning efforts with the public, interested parties, affected communities, and other governmental agencies. Specific suggestions for *Yosemite Valley Plan* consultation and coordination follow.

One respondent believes the National Park Service should consult with accessibility design experts regarding the Yosemite Valley Plan. “In formatting revisions to the plan, the U.S. Department of the Interior should include a technical review and concurrence by a panel of people from the National Center on Accessibility (NCA), the National Organization of Disability (NOD), or similar independent body with expertise in design for accessibility,” promotes this individual.

Various Forest Service employees request that the National Park Service coordinate planning with personnel from the National Forests adjoining Yosemite National Park. “Since Yosemite is surrounded entirely by four National Forests (Stanislaus, Toiyabe, Inyo, and Sierra), cooperation between the two agencies can provide a more positive and seamless experience for our common visitors,” explains one federal employee. Assistance is offered by another Forest Service employee, who states, “Representatives of the adjacent National Forests are interested in participating in the five-year visitor experience, resource protection and facility capacity study identified on page 2-12 of the Executive Summary prior to the implementation of this portion of the *Yosemite Valley Plan*.”

According to one U.S. Representative, another governmental entity that should be consulted—especially with respect to El Portal Planning—is the Mariposa County Board of Supervisors. “As you move forward on El Portal planning, please keep in mind the direct interest of the county in assisting to ensure that El Portal be further integrated into Mariposa County, rather than increasingly isolated from the community at large,” remarks this elected official.

A resident of San Jose who owns property in Yosemite West wishes to coordinate a land sale with the National Park Service. This respondent believes the park service could use the site for additional parking as well as park service and concessioner housing. “I believe that there are many private corporations that would readily fund such a relocation project for the benefit of Yosemite National Park and the American Public, with their corporation being recognized of its generosity,” posits this person. “I would like to urge you to at least take a look at the potential of our property and how it might fit into your plan.”

118. Public Concern: The National Park Service should consult with accessibility design experts regarding the *Yosemite Valley Plan*.

“In formatting revisions to the Plan, the US Department of the Interior should include a technical review and concurrence by a panel of people from National Center on Accessibility (NCA), the National Organization of Disability (NOD), or similar independent body with expertise in design for accessibility.” (Individual, Mariposa, CA - #348)

Response: The *Final Yosemite Valley Plan/SEIS* would call for architectural and programmatic accessibility in the design of new facilities and in retrofitting old facilities, including shuttle buses, visitor centers, comfort stations, and lodging facilities. Specific site designs are beyond the scope of the *Final*



Yosemite Valley Plan/SEIS. The Preferred Alternative proposes a full accessibility study and plan during the implementation phases of the *Yosemite Valley Plan*. The National Park Service, through its Accessibility Management Program, works cooperatively with the National Center on Accessibility, and produces guidelines and training on accessibility issues. Ongoing accessibility planning includes the involvement of this organization, accessibility consultants, and appropriate spokespersons for communities of individuals with disabilities.

482. Public Concern: The National Park Service should coordinate planning with personnel from the National Forests adjoining Yosemite National Park.

“Since Yosemite is surrounded entirely by four National Forests (Stanislaus, Toiyabe, Inyo, and Sierra), cooperation between the two agencies can provide a more positive and seamless experience for our common visitors. Some of the proposed actions will have an indirect impact on adjacent National Forests.” (USDA Forest Service, Sonora, CA - #9221)

“The Stanislaus and Sierra National Forests, and to a lesser degree the Inyo National Forest, are uniquely impacted by changes in visitor experience and employee housing facilities in Yosemite National Park. Any major expansion or reduction in developed recreation sites, location of employee housing or modification of visitor access, causes a ripple effect beyond the park boundary and onto the adjacent National Forest System lands. If the preferred Alternative (Alternative 2) is selected for the Final Yosemite Valley Plan, there are two major consequences of National Forest Service lands that have not been adequately mitigated. Alternative 2 identifies a reduction in almost 300 overnight visitor accommodations within the valley, with no development of additional facilities within the Park. This reduction in Park accommodations will result in a tremendous increase in visitor use of developed and dispersed recreational sites on adjacent national forests along the major corridors leading to the Park, generating increased impacts when compared to the current condition. These impacts will include increased resource damage and need for greater management oversight of affected recreational areas on National Forest System lands. This will increase our management costs and may require the Forest Service to close portions of the Forests to dispersed camping opportunities. Representatives of the adjacent National Forests are interested in participating in the five year visitor experience, resource protection and facility capacity study identified on page 2-12 of the Executive Summary prior to the implementation of this portion of the Yosemite Valley Plan.” (USDA Forest Service, Clovis, CA - #8900)

Response: This concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan*. In the past, Yosemite National Park has coordinated activities with many separate units of the federal land management agencies in the Yosemite region, including units of both the U.S. Forest Service and Bureau of Land Management.

For the purposes of the *Yosemite Valley Plan*, the National Park Service has coordinated with Inyo, Toiyabe, Sierra, and Stanislaus National Forests. This plan does analyze the cumulative effects of other actions in the region in conjunction with the impacts of each of the *Yosemite Valley Plan* alternatives. Refer to Vol. IB, Chapter 4, Environmental Consequences, of the *Final Yosemite Valley Plan/SEIS* for analysis of cumulative impacts. Management authority and jurisdiction for other federal lands rests with the appropriate land management agency.

The National Park Service has been involved with and remains committed to planning, conservation and coordination with the surrounding national forests to resolve major issues of concern. Specifically, the National Park Service is an active participant in the Sierra Nevada federal land managers Group, and the Merced River Recreation Management Work Group.

387. Public Concern: The National Park Service should coordinate with the County of Mariposa regarding El Portal planning.

“Your planning efforts include a community that is an integral part of rural Mariposa County—El Portal. As you move forward on El Portal planning, please keep in mind the direct interest of the County in assisting to ensure that El Portal be further integrated into Mariposa County, rather than increasingly isolated from the community at large.” (U.S. Representative, Fresno, CA - #2951)

Response: It is the intent of the National Park Service to continue to work cooperatively with Mariposa County concerning mutual land use and planning issues. Throughout this planning effort, the National Park Service has continually consulted with Mariposa County. This consultation has been accomplished by formal and informal communications with (1) the Mariposa County Board of Supervisors, (2) various Town Planning Advisory Committees (El Portal, Wawona and Yosemite West), (3) Planning and Public Works Departments, and (4) other community service organizations.

Furthermore, in the *Final Yosemite Valley Plan/SEIS*, the National Park Service has acknowledged the formal role of Mariposa County concerning land use planning in El Portal, Wawona, and Yosemite West planning areas. References to these official representatives of the county can be found in Vol. IA, Chapter 3, Affected Environment, thus acknowledging these representatives, and their role as official representatives of the county and community. Additionally, in the *Final Yosemite Valley Plan/SEIS*, the National Park Service has analyzed the potential impacts to facilities and infrastructure of the social and economic environments of Mariposa County (the range of alternatives considered relocating housing to locations within Mariposa County only). See Vol. IB, Chapter 4, Environmental Consequences for the impacts analysis. As future site planning is done for these areas, the National Park Service will continue to consult with these representatives, analyze potential impacts on these communities, and engage in public review.

549. Public Concern: The National Park Service should develop visitor and employee facilities at Yosemite West.

"I believe that you have overlooked the value of the area known as Yosemite West in the Draft of the Valley Implementation Plan, and I would like once again to offer the values of this strategically located, privately owned, and presently undeveloped 752 acres of land for your consideration before your final acceptance of the Yosemite Valley Plan. . . We have the potential to: 1. Reduce day use parking and traffic congestion in the Valley by providing another, perhaps more convenient, economical, and desirable parking site for day use visitors, who could then be bussed to the various points of interest from this centrally located site, 2. Provide a site for relocation of NPS and concessionaire employee housing, and, 3. Perhaps doing this more economically by involving the private sector in a partnership with the Park Service which could become a model for future public/private projects within the National Park System. I believe that there are many private corporations that would readily fund such a relocation project for the benefit of Yosemite National Park and the American Public, with their corporation being recognized of its generosity. I would like to urge you to at least take a look at the potential of our property and how it might fit into your Plan." (Individual, San Jose, CA - #5604)

Response: A specific proposal for the National Park Service to participate in a public-private partnership at Yosemite West for visitor and employee facilities has not been received. What has been tentatively proposed has been for the National Park Service to purchase land from private parties, and then find the financial means to construct visitor and employee facilities. The current landowner at one time pursued an amendment to the Mariposa County Zoning Ordinance to allow for the potential development of visitor and park operational facilities. The proposal has since been withdrawn. Yosemite West is outside the boundaries of Yosemite National Park and the National Park Service does not have the legal authority to purchase land outside the boundary of the park. Land already exists in federal ownership, primarily in El Portal, that can accommodate park needs without having to incur the additional cost of acquisition. Any development of private property in Yosemite West is subject to approval by Mariposa County. The National Park Service is committed to pursuing and participating in public-private partnerships to meet visitor, employee, and administrative needs. In order for such a partnership to succeed, there would need to be a net benefit to the federal government.



Alternatives



Final
Yosemite
Valley
Plan

Supplemental EIS

Chapter 3 ~ Alternatives

This chapter includes analysis of public comment regarding the proposed alternatives in the *Draft Yosemite Valley Plan/SEIS*. Section 3.1 includes those concerns addressing the National Park Service's development of the proposed alternatives. Some respondents offer their own comprehensive alternatives for the Plan, and these are outlined in Section 3.2. Finally, Section 3.3 covers the perceived merits and drawbacks of the proposed alternatives for the *Yosemite Valley Plan*.

Section 3.1 ~ Development of Alternatives

Many people who comment on the proposed alternatives of the *Draft Yosemite Valley Plan/SEIS* identify priorities they believe should be considered when making a final selection. The belief that resource preservation should take precedence over other management goals informs the comments of many respondents. "The range of alternatives does not offer one that would be clearly preferable from an environmental point of view," asserts one conservation organization. Another person laments, "There is no one plan that protects the natural resources of the park from decline. I have lost a great deal of faith in the park service."

Agreeing with the aforementioned constituents, another person notes that "the alternatives are prejudiced towards increasing infrastructure and development in Yosemite." This person would like to see a new range of alternatives developed, based on increasing protections for the Outstandingly Remarkable Values of the Merced River. An Historical Preservation Society believes the current plan is flawed given its lack of an alternative that emphasizes enhanced natural and cultural protection. The society notes that "the No Action Alternative (Alternative 1) appears to be the most cultural resource-friendly of all the alternatives."

In addition to management priorities, adequate funding for the *Yosemite Valley Plan* is a factor some people want the National Park Service to consider when choosing an alternative. One respondent suggests that Yosemite planners take a sequential, cost-based approach to alternative development, "starting with consideration of lower-cost alternatives and requiring higher-cost alternatives to prove their worth based on the added value of the added features that they bring to the plan." Conversely, another individual feels that cost should not factor into the development of alternatives. This person insists that "Yosemite Valley is so unique, so special, and so valuable that choices should be made on the basis of what can be achieved, not on the cost."

Following the intent and letter of the National Environmental Policy Act (NEPA) are concerns that many voiced when discussing the development of alternatives for the *Yosemite Valley Plan*. The California Department of Justice believes that the *Final Yosemite Valley Plan/SEIS* should clarify the scope of the proposed action in order to identify whether the range of alternatives considered is sufficient. "The extent to which the NPS will conduct additional site-specific environmental review is not clear. Similarly, the nature and scope of the decision that the NPS will take on the basis of this plan is also unclear. Accordingly, it is difficult for the public to determine whether the draft plan considers a broad enough range of alternatives to sharply define the issues as required under NEPA."

While some respondents question the adequacy of the range of alternatives, others criticize the depth of analysis conducted. "Despite the Plan's length, the rationales for many of its underlying premises are left unclear, seemingly fruitful options are neglected, not all the major impacts are

analyzed, and some of the analyses are superficial,” one respondent decries. Another member of the public seeks clarification on whether the final decision will be based on a combination of alternatives or solely on one proposed alternative.

180. Public Concern: The National Park Service should develop an alternative that protects the natural resources of Yosemite Valley.

“My general conclusion after assessing the Yosemite Valley Plan, as a scientist and as a citizen, is that the pollution-sensitive plants, especially ponderosa pine which is the main forest species which makes up the Valley floor ecosystem, are at great health risk from continued air pollution in all the Alternatives. I believe that not enough Alternatives were envisioned and that the ones that were presented seemed ad hoc combinations of resource protection and ‘unavoidable’ degradation. There is no one plan that protects the natural resources of the Park from decline. I have lost a great deal of faith in the Park Service, and am deeply disappointed in the assessment process after their treatment of the public comment of the MRP and their analysis of the options in the YVP.” (University of California, Department of Environmental Science, Policy, and Management, Berkeley, CA - #138)

“The Sierra Club cannot support any of the alternatives proposed in this draft for the future management of Yosemite Valley. The range of alternatives does not offer one that would be clearly preferable from an environmental point of view. In all of the alternatives presented, there are elements that the Club both supports and does not support. The alternatives do not offer enough choice, and include forced combinations of elements. In many respects, the alternatives focus on moving development around the Valley, as well as proposing various transportation options.” (Conservation Organization, Fresno, CA - #7881)

Response: The two primary purposes for Yosemite National Park as stated in the 1864 act, as described in Vol. IA, Chapter 1, Purpose and Need, are to preserve the resources that contribute to Yosemite's splendor and uniqueness and make the varied resources of Yosemite available to people for their enjoyment, education, and recreation, now and in the future. The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* achieves a balance between visitor use and enjoyment while protecting and preserving the cultural and natural resources that make up Yosemite National Park. The focus is on protecting and restoring an ecological system that is sustainable over time within the framework of continued visitor use. An emphasis has been placed on removing facilities and restoring areas to reconnect fragmented critical habitats and providing for river protection and the restoration and function of natural processes.

The *Merced River Plan/FEIS* established management zoning for all areas in the river corridor, a River Protection Overlay for areas immediately adjacent to the river, and an adaptive management approach that includes monitoring for visitor experience and resource degradation over time. These tools will enable the National Park Service to manage the river corridor to prevent degradation of resources and, in many instances, to enhance and facilitate restoration of resources.

The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* has been prepared in accordance with the Yosemite National Park *General Management Plan (1980)*, the Wild and Scenic Rivers Act, and other applicable legislation, and planning, and policy documents. Because the National Park Service is required to provide for visitor access and experience, as well as for the protection of cultural values (including historic sites), restoration to a pristine condition (that is, without evidence of human occupation or manipulation) is not within the range of objectives for areas such as Yosemite Valley, Wawona, and El Portal. Furthermore, much of what is today considered to be natural is in fact the result of centuries of human intervention by American Indians. Nevertheless, the goal is that the natural character of the landscape would be the most prominent, even in the more developed areas, and that accommodation of visitors would maximize their experiences while preserving this landscape. What the National Park Service strives to achieve in terms of visitor experience is within the context of leaving the land unimpaired for the enjoyment of future generations. The description of the methods used to develop a range of alternatives in the *Final Yosemite Valley Plan/SEIS* is included in Vol. IA, Chapter 2. (Also see response to concern #93 [Air Quality] for discussion of impacts on air quality.)



668. Public Concern: The National Park Service should develop alternatives that offer a range of increasing protections for the Outstandingly Remarkable Values of the Merced River.

“The DVP’s selection of alternatives is hopelessly narrow. The alternatives are prejudiced towards increasing infrastructure and development in Yosemite. Most or all of these developments have been proposed since the designation of the Merced River as Wild and Scenic, in the absence of a valid River Plan, and with no regard to the protection and enhancement of the river’s values. The DVP alternatives are thus not derived from a range of increasing protections for the ORVs of the Merced River, which would be proper. All of the DVP alternatives would lead directly and cumulatively to new degradation of Yosemite’s natural and human environment and increased development and impact to its protected Merced River Corridor. The DVP’s primary changing element is the location and numbers of proposed parking spaces and roads.” (Conservation Organization, Yosemite National Park, CA - #7883)

Response: The Outstanding Remarkable Values of the Merced Wild and Scenic River are considered in the *Final Yosemite Valley Plan/SEIS* along with other values associated within Yosemite Valley.

The *Final Yosemite Valley Plan/SEIS* provides a range of alternatives in Chapter 2, Alternatives, that would help achieve the broad goals of the *General Management Plan*:

- Reclaim priceless natural beauty
- Allow natural processes to prevail
- Promote visitor understanding and enjoyment
- Markedly reduce traffic congestion
- Reduce crowding

Each of the action alternatives addressed in the *Final Yosemite Valley Plan/SEIS* implement the guidance and protection provided by the *Merced River Plan/FEIS* to protect and enhance the Outstandingly Remarkable Values of the Merced Wild and Scenic River. As stated in Vol. IA, Chapter 1, Purpose and Need, of the *Final Yosemite Valley Plan/SEIS*, “Actions must protect and enhance the river’s Outstanding Remarkable Values. When Outstanding Remarkable Values are in conflict with each other, overall detrimental impacts to Outstanding Remarkable Values will be minimized.”

Following the guidance and direction provided by the *Merced River Plan/FEIS*, each of the action alternatives in the *Final Yosemite Valley Plan/SEIS* removes development from the River Protection Overlay. Any actions that propose new development or redevelopment would comply with the management elements of the *Merced River Plan/FEIS*, specifically management zoning, River Protection Overlay, and Outstandingly Remarkable Values.

(Also see responses to Concerns #169, #722, and #536.)

527. Public Concern: The *Yosemite Valley Plan* should provide an alternative that emphasizes enhanced natural and cultural protection.

“We are extremely disappointed that none of the action alternatives clearly benefit the Valley’s cultural resources. In fact, the No Action Alternative (Alternative 1) appears to be the most cultural resource-friendly of all the alternatives. The National Trust recognizes that past planning in Yosemite Valley has at times compromised the integrity of both natural and cultural resources, and the significant steps need to be made to reverse the degradation of resources. We believe that a fundamental shortcoming of the current plan is its failure to offer an alternative that emphasizes enhanced natural and cultural protection.” (Non-Governmental Organization, San Francisco, CA - #7885)

Response: Each of the action alternatives considered in the *Final Yosemite Valley Plan/SEIS* has been developed, in part, to restore, protect, and enhance the resources (both natural and cultural) to Yosemite

Valley (see Vol. IA, Chapter 1, Purpose and Need). Among the primary characteristics that define and contribute to the cultural landscape of Yosemite Valley are spatial organization, historic land-use patterns, and natural systems and features. The restoration of the Merced River corridor and meadows as described in the Preferred Alternative is integral to the overall restoration, protection, and enhancement in Yosemite Valley, and be viewed as beneficial to both natural and cultural resources. The park has also reassessed several actions in the Preferred Alternative of the *Draft Yosemite Valley Plan/SEIS*, and would propose rehabilitation of individual historic structures rather than removal whenever possible. In addition, the park would take a “phased approach” to the removal of historic bridges that impede the free flow of the Merced River. Sugar Pine Bridge and associated riverbank armoring would be removed. The park would holistically monitor the effect of bridge removal on the system prior to determining if additional bridges need to be removed. Finally, the park would undertake rehabilitation of existing historic districts within the context of the Preferred Alternative to ensure cultural resources are protected and enhanced whenever possible.

(Also see responses to Concerns #95, #648, and #225.)

241. Public Concern: The National Park Service should use a sequential, cost-based approach to the development of alternatives for the Yosemite Valley Plan.

“The problem of multiple incommensurate outcomes—environmental, visitor convenience, costs, etc.—is much the same in the Yosemite Valley Plan as in California’s annual State Transportation Plan, which must rank the relative desirability of project alternatives based, in most cases, on multiple outcomes. A sequential approach is highly recommended, starting with consideration of lower-cost alternatives and requiring higher-cost alternatives to prove their worth based on the added value of the added features that they bring to the Plan. The next ideal step, to convert all values to equivalent dollars, is usually impossible or dicey. The fall-back ideal is first to calculate the added equivalent cost of any significant intangible differences between the least-cost alternative and the next most expensive alternative, and second to quantify the most important effects of the chosen vs. the rejected alternative in as meaningful a way as possible.” (Individual, Berkeley, CA - #3480)

Response: A cost-based approach to the development of the alternatives was not used as an approach to the development of alternatives for the *Draft* and *Final Yosemite Valley Plan/SEIS*. The *Final Yosemite Valley Plan/SEIS* does present the total estimated capital and operating costs for each of the action alternatives. Understanding the total costs of implementing each of the action alternatives in a holistic manner is important, as it provides the best opportunity to compare the overall costs of each of the alternatives.

In addition, text has been added to Vol. IA, Chapter 2, Alternatives, of the *Final Yosemite Valley Plan/SEIS* to provide a more detailed discussion of the process and rationale for the development of the range of alternatives considered in document.

671. Public Concern: The National Park Service should not consider implementation costs when developing alternatives for the *Yosemite Valley Plan*.

“Many of the alternatives discussed in the plan seem to have been eliminated on the basis of cost. We think Yosemite Valley is so unique, so special and so valuable that choices should be made on the basis of what can be achieved not on the cost. If the cost of an all electric fleet of buses is twice the cost of a diesel fleet to allow recharging times so be it. The Valley is worth it.” (Individual, Berkeley, CA - #9238)

Response: Each of the action alternatives considered in the *Final Yosemite Valley Plan/SEIS* were designed to help achieve the broad goals of the 1980 *General Management Plan* and were evaluated and analyzed on their ability to best achieve these goals.

Implementation and operational costs, among many other factors, are analyzed for each of the alternatives to help identify the alternative that would be most successful in accomplishing *Yosemite Valley Plan* purposes, and therefore help achieve the broad goals of the *General Management Plan*.



291. Public Concern: The *Yosemite Valley Plan* should clarify the scope of the proposed action in order to identify whether the range of alternatives is sufficient.

“The Yosemite Valley Plan should clarify the scope of the proposed action in order to identify whether the range of alternatives considered is sufficient. As noted, the extent to which the NPS will conduct additional site-specific environmental review is not clear. Similarly, the nature and scope of the decision that the NPS will take on the basis of this Plan is also unclear. Accordingly, it is difficult for the public to determine whether the draft Plan considers a broad enough range of alternatives to sharply define the issues as required under NEPA. The draft Yosemite Valley Plan proposes a limited range of alternative for some projects. Specifically, with respect to the proposal to rebuild the Yosemite Lodge, three of the four action alternatives propose the same thing—rebuilding 141 units destroyed by the 1997 flooding. One alternative calls for more rebuilding (195 units). Only the no action alternative proposes not to rebuild any units. In addition, the Plan never considers alternatives such as removing existing units or using the area proposed for rebuilding the Lodge for lower-cost accommodations or for providing an alternate location for employee housing. Similarly, all the action alternatives—without explanation for the reasons behind this proposal—call for removing the same number (208) of lower-cost units from Curry Village. Only the no action alternative evaluates retaining these lower-cost units, and no alternatives look at relocating the units to other areas proposed to be developed or redeveloped for housing/lodging type uses. On the one hand, the Plan suggests that the narrow range was proposed to achieve consistency between this Plan and the levels of service provided in other park-wide planning documents, including the 1980 GMP and the Concessions Services plan adopted in 1992. YVP Vol. 1A at 2-4. The implication of this suggestion is that the NPS perhaps intends to decide based solely on this plan that (for example) 141 Lodge units will be rebuilt. On the other hand, however, the Plan specifically recognizes that changing circumstances and further study may result in a modification of the levels of service provided in prior planning documents. For example, the Plan expressly acknowledges that the visitor use levels developed in 1980 may be modified after the NOS completes a detailed visitor experience and resource protection study in the next five years. YVP Vol. 1A at 2-11. In addition, the Plan states that the 1997 floods require a decrease in the amount of overnight accommodation from the level anticipated in the 1980 GMP, particularly those accommodations historically located in flood plain areas. 1980 GMP at 15 with YVP Vol. 1A at 2-10. Thus, in acknowledging the potential for change after future study, the NPS suggests that the scope of the decision that levels of service, or general land use allocation, that will be further analyzed and refined as specific development projects are evaluated. As this additional analysis is conducted, a broader range of alternative—such as not rebuilding the Lodge, rebuilding in the form of lower-cost units, rebuilding a smaller number of units, removing some units, using the area for other housing related activities - would be examined, providing a clearer basis for choice among the options. Thus, because it is not clear from the draft Plan whether the NPS intends to conduct additional site-specific analysis of a broader range of alternatives as further information becomes available and as ‘second-tier’ environmental review is conducted for specific projects, it is likewise unclear exactly what decision the NPS believes it can make on the basis of this Plan. This lack of clarity makes it difficult, if not impossible, for the public to determine whether the Plan considers a broad enough range of alternatives under NEPA.” (California Department of Justice, Sacramento, CA - #5430)

Response: The range of alternatives presented in the *Final Yosemite Valley Plan/SEIS* is based upon the Purpose and Need as presented in Chapter 1 of the document. The Purpose and Need is based upon achieving the five broad goals of the 1980 General Management Plan, and includes a set of criteria for meeting the goals of the GMP. The action alternatives have been developed based upon the extent to which they meet and integrate, as appropriate, these criteria. Consistent with Council on Environmental Quality regulations for implementing NEPA, the alternatives present a reasonable range of distinct choices in how best to meet the plan’s goals. NEPA does not require agencies to present alternatives that are merely permutations of one idea or approach. The discussion of the process utilized by the National Park Service to develop a reasonable range of alternatives has been expanded in the *Final Yosemite Valley Plan/SEIS* (see Chapter 2, Alternatives).

The National Park Service disagrees that planning for lodging numbers in the Valley has been based solely on the numbers presented in the General Management Plan and Concession Services Plan. These numbers have been used as overall guidance in developing proposals for numbers and types of lodging under the various alternatives, but have been adjusted based on current conditions, public comment, and the overall goals of this plan. In addition, the National Park Service has made revisions in the *Final Yosemite Valley Plan/SEIS* that address the commentor’s concerns regarding the range of alternatives in

the plan with respect to lodging. For example, the National Park Service has made minor revisions to the proposed action that include replacing damaged Yosemite Lodge units with lower cost cabin accommodations. In addition, additional tent cabins have been retained at Curry Village relative to the numbers proposed in the draft plan. These modifications expand the range of alternatives relative to future treatment of Yosemite Lodge and Curry Village. Please refer to Chapter 2, Alternatives in the final document for the adjustments made to the project alternatives.

The *Final Yosemite Valley Plan/SEIS* includes additional information regarding phasing and sequencing of the Preferred Alternative (see Appendix M). The Introduction of Chapter 1, Purpose and Need also includes additional discussion and commitments relating to the need for additional site-specific planning, design, and compliance activities. For example, an appropriate level of National Environmental Policy Act compliance would be conducted for future site-specific planning and design activities associated with development at El Portal, including opportunities for public involvement.

The Yosemite Valley Plan is based upon the best available information. At this time, the National Park Service does not anticipate making changes to the actions presented in the *Final Yosemite Valley Plan/SEIS* during subsequent site-specific planning, design, and tiered compliance activities. However, should new data become available, the National Park Service would take this information into account in determining whether the project could go forward as per the Yosemite Valley Plan or whether additional compliance with the National Environmental Policy Act (e.g., a supplemental environmental impact statement) would be necessary.

345. Public Concern: The National Park Service should improve its analysis of alternatives for the *Yosemite Valley Plan*.

“Despite the Plan’s length, the rationales for many of its underlying premises are left unclear, seemingly fruitful options are neglected, not all the major impacts are analyzed, and some of the analyses are superficial. Moreover, most alternatives include some odd relicts that seem inconsistent with their dominant theme; a most egregious example is the Camp 6 parking lot, clearly within the floodplain, an eyesore from both rims, and located astride the finest wildlife and pedestrian corridors through the Valley.” (Individual, Oakland, CA - #3835)

Response: Although a portion of the Camp 6 (Yosemite Village) day-visitor parking area, as proposed in Alternative 2, would be situated in the floodplain, effects on the floodplain are anticipated to be minor. No overnight parking or accommodations would be present at the site, thereby minimizing the risk to human life and property from the effects of flood events. Day-visitor parking currently occupies a portion of the Camp 6 site.

Both the *Draft* and *Final Yosemite Valley Plan/SEIS* have undergone thorough and comprehensive impacts and analysis and disclose the adverse effects to scenic resources associated with implementation of the Camp 6 parking facility. The Camp 6 facility would be visible from some viewpoints in the Valley, including Upper Yosemite Fall and Glacier Point. The current parking facility at Camp 6 is already visible from Glacier Point. Although new development would occur in the Valley, much of this development would be adjacent to existing developed areas already modified by facilities and human activity. Overall, however, there would be a substantial net decrease in acres of development in Yosemite Valley under the Preferred Alternative caused by the restoration of natural areas, thereby improving scenic quality from a number of vantage points. Despite the adverse effects associated with the Camp 6 parking area, the amount of overall visual intrusion into Yosemite Valley scenery would be reduced.

As described in Vol. IB, Chapter 4 of the *Final Yosemite Valley Plan/SEIS*, some adverse impacts to wildlife would occur should a transit facility be implemented at Camp 6. However, the portion of the Camp 6 site located within the River Protection Overlay would be restored, helping to provide improved wildlife diversity and abundance. Overall, impacts to wildlife from implementation of the Preferred



Alternative would be beneficial, largely because of the restoration of substantial areas of highly valued resource habitat within the Valley.

As noted in the comment, it is important to recognize and disclose the impacts of individual actions proposed in each of the alternatives, such as the Camp 6 parking area under Alternative 2. However, given the complexity of each alternative, the effect of all actions comprising the alternative must be weighed together in a holistic manner to give an accurate picture of the overall effect of the alternative on a particular resource. The *Final Yosemite Valley Plan/SEIS* (Vol. IB, Chapter 4, Environmental Consequences) provides impact analyses from both perspectives.

438. Public Concern: The National Park Service should clarify the role of alternatives in the *Yosemite Valley Plan* decision process.

“When the record of decision is made, will it be one of the alternatives 1-5 as presented in the Draft YVP-SEIS exactly as the alternative is presented or will it possibly be a combination of plan elements chosen from amongst the 5 alternatives?” (Individual, No Address - #3441)

Response: Typically, the decision maker will select one of the alternatives as presented in the final environmental impact statement, with the decision documented in a Record of Decision. However, the decision maker may choose to modify certain elements of the selected alternative or substitute actions from another alternative. In order for this to occur without reanalysis of the alternative and redistribution of the document to the public for comment, the impacts of this “modified” Preferred Alternative must have been addressed in the final environmental impact statement, including any interrelationships between the various elements or actions of the alternative. The National Park Service will ensure that this process is followed consistent with the requirements of the National Environmental Policy Act (NEPA) as amended, Council on Environmental Quality Regulations for implementing NEPA, and National Park Service NEPA Guidance (NPS-12).

Section 3.2 ~ New Alternatives

Rather than suggesting specific changes to the development of alternatives or the alternatives themselves, a few respondents propose completely new alternatives. Four different proposals are offered for consideration: a five-year interim plan, an auto-touring alternative, a “sixth” alternative, and the Operation Traffic Sweep proposal.

349. Public Concern: The National Park Service should adopt a five-year interim plan for Yosemite Valley.

“The Madera County Board of Supervisors suggests a five-year interim plan for Yosemite Valley to address issues of immediate concern. During this interim period, preparation and planning for a well-researched and fully-informed comprehensive Draft Yosemite Valley Plan can be conducted. Such a Plan will encompass broad-based public involvement and will be presented in its entirety with all projects detailed within its context. Recommendations during the interim include: Replace aging in-Valley diesel shuttle fleet with non-diesel vehicles immediately; Expand in-Valley shuttle route to include Bridalveil Fall and Four Mile Trail; Implement aggressive ‘Ride the Shuttle’ campaign; would include restricting overnight visitors to assigned parking, requiring YCS/NPS employees to ‘bus’ to work, informing day visitors to leave vehicle parked until such time as they are ready to leave the Valley; Explore creation of traffic management working group that includes shuttle bus drivers, patrol rangers, gate fee personnel, road maintenance, and other employees who have experience working directly with visitors ‘on the ground’; Resolve deplorable employee housing situation by working directly with employees (e.g., fewer services means need for fewer employees; opportunities for shift consolidation; transportation options, etc.). Remove trailer/cabins from parking areas; Enforce Mariposa Grove recreational vehicle length restrictions of 23 feet park wide (under premise that vehicles must be able to fit into one parking space). No generators to be used in the Valley from 7 p.m. to 7 a.m.; Increase ranger presence (or volunteer host/intern) at areas needing more supervision (e.g., Swinging Bridge, etc.); Retain existing lodging (no new units) during interim period; Retain current mix of campgrounds, striving to increase number to pre-flood levels during interim period. Create ‘Camping Advisory Council’ to include members of the camping public, environmentalists, as well as park personnel to work toward resolution of issues of concern to campers.” (Madera County Board of Supervisors, Madera, CA - #4284)

Response: As stated in Vol. IA, Chapter 1, Purpose and Need, the *Final Yosemite Valley Plan/SEIS* consolidates planning efforts initiated to implement aspects of the 1980 *General Management Plan* into a single, comprehensive approach. This comprehensive approach will ensure that all actions implemented would be consistent with obtaining the five goals of the *General Management Plan* and are not fragmented. Both short-term and long-term implementation actions are included in the *Final Yosemite Valley Plan/SEIS*, and the environmental consequences of all the actions have been evaluated comprehensively. Implementation of an interim plan would not offer the advantages of a comprehensive plan completed to achieve the goals of the *General Management Plan*. The Sequencing Plan presented in Vol. II, Appendix M of the *Final Yosemite Valley Plan/SEIS* outlines the sequences of actions to be implemented both short-term and through full implementation.

434. Public Concern: The *Yosemite Valley Plan* should include an auto-touring alternative.

“The YVP is being guided by five goals contained in the 1980 GMP. Those goals are to reclaim priceless natural beauty, allow natural processes to prevail, promote visitor understanding and enjoyment, markedly reduce traffic congestion and reduce crowding. With the notable exception of the no action alternative, the Draft Yosemite Valley Plan’s preferred and subsequent alternatives contain traffic management conditions designed to limit private automobile accessibility to the Park as a means to achieve two-decade-old goals of the GMP. None of the proposals offered in the YVP indicate a study of auto touring as a viable alternative was considered. Despite concluding that newer automobiles emit substantially less pollutants than their 20 year old predecessors, and acknowledging that if the no action alternative was implemented better air quality would be achieved, any auto touring option has been deemed as inappropriate and nonbeneficial. Modern day traffic management and traffic calming techniques have



evolved since the 1980 GMP, which combined with recent and future vehicle emission improvements make the GMP obsolete. An auto touring alternative that embraces the most recent traffic management, traffic calming, Air Resources Board vehicle emissions policies and crowd control techniques is at the very minimum a reasonable alternative to be considered.” (Tuolumne County Board of Supervisors, Sonora, CA - #4436)

Response: Although the five broad goals of the 1980 *General Management Plan* are two decades old, the National Park Service believes these goals to be valid and applicable to the Valley today. Under the Preferred Alternative in the *Final Yosemite Valley Plan/SEIS*, auto touring would continue to be available as a visitor activity throughout Yosemite National Park, with the exception of the portion of Yosemite Valley east of El Capitan Crossover. Roadside parking areas would be retained throughout the park including areas in the west Valley such as Southside Drive in the Bridalveil Fall area and Valley View to allow visitor access by automobile. There would be no limit placed on the number of visitors who could see Yosemite by auto touring, including the ability to drive through the park from one entrance to another.

An alternative emphasizing auto touring in areas east of El Capitan Crossover was considered but dismissed. Traffic congestion and crowding in the east end of Yosemite Valley would not be markedly reduced merely by implementation of modern traffic management and calming measures. Beginning during the summer of 1999, the National Park Service implemented its Traffic Management Program to help relieve traffic congestion during the peak summer season. Although this program has resulted in substantial improvements to traffic conditions, the parking facilities in the east Valley remain unable to accommodate visitor demand. Comparisons between peak summer season traffic counts and parking inventories (which include turnouts) indicate a shortage of up to 775 parking spaces in the East Valley. To realize the goals of the 1980 *General Management Plan* the park needs to implement transportation systems that meet visitor needs throughout the year. In order to accommodate auto touring based upon existing peak season visitor demand, the National Park Service would have to construct extensive new parking lots, turnouts, and roads so that vehicles could tour and park without creating traffic congestion. The resource impacts of constructing these new facilities would be unacceptable and inconsistent with the Purpose and Need and goals of the Yosemite Valley Plan, including the five broad goals of the 1980 *General Management Plan* (see Chapter 1, Purpose and Need in the *Final Yosemite Valley/SEIS*). The National Park Service is proposing to restore natural conditions rather than develop extensive new facilities for automobiles. Consequently, an auto-touring alternative would not adequately achieve other *General Management Plan* goals such as reclaiming priceless natural beauty and allowing natural processes to prevail.

329. Public Concern: The National Park Service should consider a sixth alternative for the *Yosemite Valley Plan*.

“I propose Alternative #6 and ask that you give consideration to the merits of this alternative. Build a parking facility at Taft Toe large enough to accommodate all day-use parked vehicles based on anticipated highest-use level; Expand shuttle bus route to provide frequent service to El Capitan Bridge (or possibly Pohono Bridge) and serve the Taft Toe parking facility. Shuttle buses would need to stop at all tourist spots. Consideration should also be given to optional drop off/pick-up points for hikers; Eliminate all off-road parking throughout the Valley except in designated areas; Eliminate the Village Grocery Store and instead construct mini satellite stores in each of the campgrounds; Leave balance of Village, including Visitor Center, as is; Eliminate all parking at the Village, except for handicapped parking; Retain all bridges; Eliminate Housekeeping Units and revamp to a regular campground; Do not construct additional campgrounds, either car camping, walk-in or walk-to; Retain North Pines Campground; Re-open at least parts of Upper and Lower River Campgrounds for use in summer months only; Eliminate stables and horseback riding, allowing access only for those stock animals needed for the high country; Leave Northside and Southside Drives as they are currently designed; Develop more bicycle and walking paths.” (Individual, San Leandro, CA - #3133)

Response: The sixth alternative, proposed in a public comment, includes many actions that are included within the range of alternatives (Alternatives 1 through 5) in the *Final Yosemite Valley Plan/SEIS*, such as a parking facility at Taft Toe, no parking at Yosemite Village, and retaining all bridges. There are

numerous options for each subject area, and many potential ways to package them into alternatives. However, the Council on Environmental Quality (CEQ) has indicated that only a “reasonable number of examples covering the full spectrum of alternatives must be analyzed and compared.” Please refer to the Introduction to Vol. IA, Chapter 2, Alternatives, in the *Final Yosemite Valley Plan/SEIS* for additional discussion regarding developing a range of alternatives.

756. Public Concern: The National Park Service should consider the Operation Traffic Sweep proposal.

“The cornerstone of this plan focuses on the controlling of traffic, which is probably the single most critical problem facing Yosemite Valley today. This plan meets one of the key goals of the 1980 General Management Plan, ‘to reduce traffic congestion.’ This plan is based on the concept that, often, objectives can be accomplished with highly creative and imaginative, if not unorthodox, yet inexpensive, ideas, such as opening up the Valley west end to RV type ‘campers.’ The first eight chapters of this plan address the ‘traffic congestion’ problem and should be considered as a package. It is possible that if the traffic congestion problems are addressed along the lines outlined in this plan, the resultant improvements might cause some of the other problems and alternatives covered in the draft YVP/SEIS to be viewed in a different light. . . My plan’s ideas for traffic control are simple, logical, cost effective (proposed costs are negligible) and can be implemented immediately with minimum planning and preparation. This proposal can be read in about 30 minutes so I humbly ask that you take the time to read it, and I hope you will be pleasantly surprised.” (Individual, American Canyon, CA - #907)

Response: The full range of impacts of the alternatives presented in the *Final Yosemite Valley Plan/SEIS* was considered in the selection of the Preferred Alternative. Consequences considered included natural and cultural resources, visitor experience, social and economic impacts, safety, transportation, and park operations. In order to provide a diversity of experiences for visitors, the Preferred Alternative offers a range of accommodations for transportation access, lodging, camping, and recreational activities.

For travel, the Preferred Alternative provides a variety of ways to access each area of the Valley, although not all areas have the same type of access. Southside Drive will be accessible by automobile and shuttle bus, and portions of Northside Drive will only be accessible by nonmotorized means. Under the Preferred Alternative, total vehicle miles of travel would be reduced compared to the No Action Alternative. With the overall reductions in parking and resulting reductions in traffic, Southside Drive will be able to safely accommodate two-way traffic (see Vol. IB, Chapter 4, Environmental Consequences). Additionally, the Preferred Alternative proposes to widen the travel lanes and shoulders on Southside Drive to better accommodate two-way traffic. With the proposed reductions in vehicular traffic, re-establishing the road across Ahwahnee and Sugar Pine Bridges would not be necessary. The Sugar Pine Bridge would be removed under the Preferred Alternative, making such a road connection infeasible. (For more information on roadways in the Valley, see responses to concerns #29 and #80.)

During the development of the *Yosemite Valley Plan*, the density of overnight accommodations (including lodging and campground units) was considered in terms of visitor experience and impacts to resources. The Preferred Alternative provides a variety of types of overnight accommodations, each located to minimize impacts to resources while providing a quality experience. This variety of overnight accommodations would provide visitors with a range to choose from to accommodate their needs. (For more information on the number and design of lodging units in the Valley, see responses to concerns #71, #72, #73, #119, #120, #163, #339, #459, #617, #622, #624, and #691.)

The closure of one lane of traffic to vehicles for pedestrian traffic was evaluated in Alternative 5, but this is not part of the Preferred Alternative. Although the development of the Taft Toe area was evaluated in Alternatives 3 and 4, development at Taft Toe was also not included in the Preferred Alternative. The improvement of Curry Orchard as a day visitor parking area was evaluated under Alternative 5, however, the *Merced River Plan/FEIS* did not zone this area for day-visitor parking. (For more information regarding the amount and location of parking in the Valley, see responses to concerns #2, #61, #121, #122, #130, #242, and #334.)



The implementation of a color-coded pass system for vehicles is an operational issue that is beyond the scope of the *Yosemite Valley Plan*. The *Yosemite Valley Plan*, however, does propose the implementation of a traveler information and traffic management system that would be developed with extensive public involvement after completion of the *Yosemite Valley Plan*. This system would manage the number of vehicles in Yosemite Valley and, potentially, the park so as not to exceed the capacity of parking areas and roads. This system may consider ways to manage traffic, including options for better identifying and matching vehicles to parking spaces. The traveler information and traffic management system would also take into consideration the seasonality of visitation. The pass system described in Operation Traffic Sweep would be considered in the planning process for the traveler information and traffic management system. Parking and other traffic management enforcement is also an operational issue that is beyond the scope of the *Yosemite Valley Plan*.

The Preferred Alternative proposes to extend the Yosemite Valley shuttle system Valley-wide as well as to provide shuttle service from the out-of-Valley parking areas (Badger Pass, El Portal, and Hazel Green or Foresta) to the Valley. The operations of shuttles to Glacier Point, Wawona, and Tuolumne Meadows are beyond the scope of the *Yosemite Valley Plan*.

The park is in the process of replacing the current shuttle fleet. For this replacement, as well as for vehicles used in the implementing the *Yosemite Valley Plan*, the park will deploy newer, cleaner bus technologies. Over the long term, even the implementation of diesel technology will result in reduced vehicle emissions (see Chapter 4, Environmental Consequences). Regulating emissions from tour buses and commercial supply trucks is a policy issue that is beyond the scope of the *Yosemite Valley Plan*. (For more information regarding the selection of buses for operation on shuttle routes and the air quality effects of transportation, see responses to concerns #75, #92, #197, #1042, #1044, #1045, and #1046.)

Outside of the highly valued resource areas, River Protection Overlay, floodplains, and rockfall and debris flow zones, there is a relatively small amount of space in the Valley suitable for development. If most of the employees who worked in the Valley lived in the Valley, there would not be enough space for visitor accommodations. To provide enough space for visitor accommodations, the *Yosemite Valley Plan* proposes to house most employees outside of the Valley except for those employees necessary to handle emergency functions and to run one shift of visitor services. Employees needed to handle emergency functions do not include the National Park Service and Concessioner headquarters and administrative offices. In the Preferred Alternative, these functions would be relocated out of the Valley to provide space for visitor accommodations and visitor services development. (For more information regarding employee housing and administrative activities, see responses to concerns #338, #340, #394, #702, #1094, #1163, and #1164.)

Consideration of a daycare camp operated by the concessioner is beyond the scope of the *Yosemite Valley Plan*.

The Preferred Alternative proposes the relocation of the Superintendent's House (Residence 1) because of its presence in the floodplain and its impacts on natural resources. The consequences of relocating this structure are described in Chapter 4, Environmental Consequences.

Also part of the *Yosemite Valley Plan* is the development of an employee transportation program that will evaluate safe, efficient, traffic-reducing transportation options for employees commuting to work, especially those employees who reside along the Highway 140 corridor, including El Portal.

Because of *Merced River Plan/FEIS* management zoning and highly valued resources, the area that contained the former Upper and Lower River Campgrounds is not considered appropriate for development as a day-visitor parking area or as a location for the rafting concession. This area would be restored to its natural condition. (Additional information on rafting can be found in the response to concerns #154 and #520.)

Alternatives 3 and 4 of the *Yosemite Valley Plan* evaluate development in the west Valley at Taft Toe. The new impacts to ecological and cultural resources in the west Valley are evaluated in Chapter 4 (see Chapter 4, Environmental Consequences).

Under the Preferred Alternative, prior to construction activities, Yosemite Village and Curry Village would undergo site-design processes. Transportation circulation in these areas would be designed to minimize conflicts between pedestrians and vehicles. This includes rerouting roadways along the perimeter of pedestrian areas so that pedestrians do not have to cross busy roadways to get to activity areas. The reductions in vehicle traffic proposed by the *Yosemite Valley Plan* would ensure that traffic volumes are lower than present, making the Valley more pedestrian friendly.

In the Preferred Alternative, several bridges that impede the natural flow of the river would be evaluated and possibly removed. The impacts of these bridges on the natural environment can be found in Chapter 3, Affected Environment and Chapter 4, Environmental Consequences. The National Park Service would complete required historical documentation and follow all compliance regulations prior to removing bridges. (For more information regarding bridges and their effects on the Merced River, see responses to concerns #11, #352, #426, #1124, and #1125.)

In the Preferred Alternative, a grocery store would be developed at Curry Village rather than in the campgrounds themselves in order to consolidate high-use functions. The sale of firewood is beyond the scope of the *Yosemite Valley Plan*. The management of fires and fuel will be addressed in the update to the *Fire Management Plan*.

There is no evidence that bears are more prevalent at the former Curry Dump site than elsewhere in the Valley. There is also no evidence that the location of a stable in this site would pose a safety hazard.

Providing a gas station in the Valley was analyzed as part of Alternative 5, but this action was not included in the Preferred Alternative.



Section 3.3 ~ Proposed Alternatives

Public comment regarding the proposed alternatives generally falls into three categories: support for a given alternative, requests for modification of a given alternative, or opposition to a given alternative. Although respondents offer myriad reasons for supporting or opposing specific alternatives, they generally focus on solutions to the challenge of balancing resource protection and visitor experience. Many people's support of or opposition to a given alternative is largely influenced by the degree to which the alternative promotes resource protection, retains camp sites, and restricts parking and personal vehicle access. The reader should note that public concerns addressing alternatives with respect to specific resource areas are included in the appropriate resource area sections of this analysis document.

Alternative 1

10. Public Concern: The National Park Service should select the No Action Alternative of the *Yosemite Valley Plan*.

"I have reviewed the draft documents for the Yosemite Valley Plan, and am appalled. I had no idea you folks were contemplating such enormous expenditures, in excess of \$300 million for every alternative except the 'No Action,' to accomplish very little except to make it harder to visit the park. Yosemite is, in fact, in quite good shape, offers wonderful experiences for its visitors, and needs only reasonable facilities maintenance. The Park Service has consistently exaggerated the congestion problems, and is now proposing to expend an enormous amount of money in pursuit of an abstract idea that natural conditions will somehow be improved thereby. Fewer people will be able to stay in the Valley, and more people will take a bus ride and go away. Perhaps that is the result you seek. I say leave it alone. I prefer Alternative 1, No Action." (Individual, Woodland, CA - #19)

"After spending considerable time reviewing your alternatives, unfortunately I have concluded that I would opt for plan 1, the status quo, because I do not like the draconian removal measures found in the other plans. Specifically I am opposed to the removal of: North Pines Campground, any of the beautiful historic bridges, the historic Superintendent's house, and the deletion of the commercial trail rides." (Individual, No Address - #378)

"Alternative 1 is the only alternative that leaves access to the park to all Americans. It does not limit access to the wealthy. It grants access to the park on a first come first serve basis." (Individual, No Address - #415)

Response: The National Park Service has thoroughly evaluated and analyzed the No Action Alternative along with the four action alternatives in both the *Draft* and *Final Yosemite Valley Plan/SEIS*. As a result of this evaluation and analysis, the National Park Service has determined that the No Action Alternative would not implement the guidance and direction provided in the *Merced River Plan/FEIS* and would not help to achieve the broad goals of the 1980 *General Management Plan* to reclaim natural beauty, allow natural processes to prevail, promote visitor understanding and enjoyment, markedly reduce traffic congestion, and reduce crowding.

372. Public Concern: The National Park Service should not select the No Action Alternative of the *Yosemite Valley Plan*.

"Alternative 1 is definitely out. To save this valley we love to death many changes must come about. The preservation of the valley must take precedence over individual wants. Overheard 2 people: One felt she had a right to drive her car into the valley since it was her car and she can't stand buses. Another person, an employee in the valley, felt it unfair to move residences out of the park, he came to work in the park and live there. Ridiculous: for the health of the valley, we cannot continue to drive so many cars in, nor can we all live there!" (Individual, Cambria, CA - #1482)

Response: Inclusion of a No Action Alternative in an environmental impact statement is a requirement of Council on Environmental Quality regulations for implementing the National Environmental Policy Act (NEPA) of 1969, as amended. The No Action Alternative serves as a baseline from which to compare the impacts of the action alternatives (Alternatives 2, 3, 4, and 5 in the *Yosemite Valley Plan*).

Although fulfilling the role of comparative baseline, the No Action Alternative is a legitimate alternative that could be selected. However, as discussed in Vol. IB, Chapter 4 of the *Final Yosemite Valley Plan/SEIS*, implementation of the No Action Alternative would allow a number of current adverse impacts such as traffic congestion and resource degradation to continue in the future. For some impacts, such as widening the Merced River channel and the accelerated loss of wet meadow communities, impacts would not only continue but would likely worsen over time.

Alternative 2

2. Public Concern: The National Park Service should implement Alternative 2 of the *Yosemite Valley Plan*.

“Congratulations on taking a big step forward with Preferred Alternative 2. Among the most appealing features is the transportation and parking area near Yosemite Village. The location will allow day visitors easy access to many of the prime attractions within easy walking distance. Restoration of valley habitats seems to strike a good balance. Moving almost half of employee housing and NPS and concessioner headquarters makes it clear that sacrifices in convenience are being made by all, not only the general public.” (Individual, San Francisco, CA - #131)

“Alternative 2 is an inspiration! Thank you for your hopes to restore significant areas of meadowland, remove roads, provide vehicle-free zones, find a balance between environmental protection and all uses, and between scales of lodging, RV camping, and walk-in camping. Thank you for protecting Camp 4 and looking for balanced solutions to parking, transportations, and employee housing issues. I feel Alternative 2 is well done, and I support it. Thanks for the good work you are doing for Yosemite, and all of us.” (Individual, Oakdale, CA - #215)

Response: Comments supporting the Preferred Alternative are acknowledged. The National Park Service appreciates commentors’ interest in the future of Yosemite Valley.

61. Public Concern: The National Park Service should modify Alternative 2 of the *Yosemite Valley Plan*.

“I . . . analyze and evaluate the *Yosemite Valley Plan*. . . in terms of these five goals and also the following principles, which are at the level of the ‘guidance criteria’. . . No detracting development. To repeat text from Olmsted, we should oppose ‘all constructions markedly inharmonious with the scenery or which would unnecessarily obscure, distort or detract from the dignity of the scenery.’ An undisturbed natural area is preferable to a restored one. Every restoration biologist I know agrees with this principle. . . Restrict development to the eastern Valley. It is a long-established principle that development on the Valley floor should be restricted to the eastern (upper) Valley. . . Wide range of accommodations. According to the November 1999 Yosemite Planning Update, ‘Visitors believe it is important to be able to spend the night in Yosemite Valley and a range of accommodations is needed.’ I concur with this as an important principle. The multiplier effect. . . if you can eliminate a feature, then you can also eliminate the infrastructure needed to support that feature, and the infrastructure needed to support that eliminated infrastructure, etc. . . Consistency and Balance. . . Alternative 2 has many attractive features. Although flawed in detail as presented in the YVP, it is the basis for a viable Valley plan. . . but there are additional opportunities for removing development from the Valley that would improve both natural resource protection and the visitor experience.” (Individual, Oberlin, OH - # 580)

“My specific recommendations regarding implementation of Alternative 2 are (1) Remove none of the bridges targeted for destruction. (2) Leave 1000 parking spaces in the Valley - divided between the Village area and the Camp Curry area. Limit the out of Valley parking to about 200 at each of the three proposed sites. Turn away all vehicles whenever gridlock is imminent.” (Individual, Riverside, CA - #121)



“Overall, the NPS preferred alternative has some good points, but causes year-round problems that it will not be able to resolve. I do not see the preferred bus plan as the best solution for traffic problems. In general, I am leery of the forced diesel busing plans, excessive reduction in parking, and any reduction in campsites. It is quite unfriendly and inflexible. Basically I think the busing plan should be cut in half, so only half as many out of valley parking spaces and bus runs are needed. More day parking and campsites are needed.” (Individual, San Diego, CA - #3479)

Response: This concern is acknowledged; however, increasing the parking for day visitors to 1,000 spaces would result in increased congestion on Southside Drive if Northside Drive were closed. If Northside Drive were to remain open to vehicle traffic, the benefits to the visitor experience from creating a multi-use paved path along a significant length of the Merced River free from vehicle traffic would be lost. Leaving all bridges over the Merced River would hamper efforts to restore natural processes and would continue undesirable effects to highly valued resources. Because of these factors, the benefits of the changes proposed in Alternative 2 (the Preferred Alternative) could not be realized.

More out-of-Valley parking would be needed in the Big Oak Flat Road corridor than the Wawona Road or Arch Rock Entrance Road corridors because a higher share of visitors approach the Valley along this route.

Each of the four action alternatives in the *Final Yosemite Valley Plan/SEIS* propose the implementation of a traveler information and traffic management system that would manage the number of vehicles in Yosemite Valley and, potentially, the rest of the park, to stay within the capacity of the roadways and parking areas. This system would be designed to improve visitor experience and safety, reduce congestion, and protect natural and cultural resources. A discussion of the traveler information and traffic management system is discussed in more detail in Vol. IA, Chapter 2, Actions Common to All Alternatives.

62. Public Concern: The National Park Service should not select Alternative 2 of the *Yosemite Valley Plan*.

“I am totally opposed to Alternative #2. You label it the Preferred Alternative. Preferred by whom? I am sure it is preferred by bikers, backpackers and government workers.” (Individual, Capitola, CA - #165)

“I am frankly baffled that anyone who claims to care about the environment would propose a traffic plan such as Plan 2. If such a plan is instituted I will not hesitate to share my outrage with every politician who might be able to do anything to stop such a plan. Yosemite Valley is a sacred place and it deserves to be treated with more thoughtfulness than was expressed by the creators of Plan 2.” (Individual, Santa Rosa, CA - #9014)

Response: At the time of the release of the *Draft Yosemite Valley Plan/SEIS*, Alternative 2 was designated the Preferred Alternative by Yosemite National Park management staff. The selection was made by analyzing which of the various alternatives best met the criteria described in Vol. IA, Chapter 1, Direction for This Planning Effort. This was to be a provisional designation, however, as the Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* can only be decided as a result of processing comments received from the public and consultation with other agencies.

Alternative 3

121. Public Concern: The National Park Service should select Alternative 3 of the *Yosemite Valley Plan*.

“I would like to support Alternative 3 of the Yosemite Valley Plan. I have looked over Taft Toe several times and feel that the reduction of the environmental quality of that area would be minuscule compared to the immense benefit to Upper Yosemite Valley, where almost all Yosemite Visitors spend most of their time in the park.” (Individual, San Diego, CA - #488)

Response: The National Park Service has evaluated and analyzed Alternative 3 along with the other three action alternatives and the No Action Alternative in both the *Draft* and *Final Yosemite Valley Plan/SEIS*. As a result of this thorough evaluation and analysis, Alternative 2, as modified in the *Final Yosemite Valley Plan/SEIS*, has been identified as the Preferred Alternative for future management and development in Yosemite Valley. Refer to the Introduction in Vol. IA, Chapter 2, Alternatives, for a discussion of the identification of the Preferred Alternative.

334. Public Concern: The National Park Service should not select Alternative 3 of the *Yosemite Valley Plan*.

“I believe all the other alternatives are inferior to #2. Of the others, I particularly object to Alternative #3, ‘Taft Toe.’ To construct a huge, 1600 car parking lot at Taft Toe would be a big step in the wrong direction.” (Individual, Simi Valley, CA - #1488)

Response: Alternative 3 is a feasible approach for meeting the goals and accomplishing the purpose and need of the *Yosemite Valley Plan*. After a detailed evaluation of all of the *Final Yosemite Valley Plan/SEIS* alternatives, the National Park Service has identified Alternative 2 as the agency’s Preferred Alternative. The National Park Service believes Alternative 2, as modified in the *Final Yosemite Valley Plan/SEIS*, would provide the best approach to preserving the resources that contribute to the splendor of Yosemite Valley, as well as making those resources available to the public. Refer to the Introduction in Vol. IA, Chapter 2 for additional discussion regarding identification of the Preferred Alternative.

Alternative 4

122. Public Concern: The National Park Service should select Alternative 4 of the *Yosemite Valley Plan*.

“I have spent several days reviewing the recent Draft Yosemite Valley Plan and would like to reiterate my concerns over your preferred alternative and stress that you reconsider Alternative 4 as the option that better serves the NPS, the Park itself, and the public.” (Individual, Eugene, OR - #326)

Response: The National Park Service has evaluated and analyzed Alternative 4 along with the other three action alternatives and the No Action Alternative in both the *Draft* and *Final Yosemite Valley Plan/SEIS*. As a result of this evaluation and analysis, the National Park Service has identified Alternative 2, as modified in the *Final Yosemite Valley Plan/SEIS*, as the Preferred Alternative that would best achieve the broad goals of the 1980 *General Management Plan* to reclaim natural beauty, allow natural processes to prevail, promote visitor understanding and enjoyment, markedly reduce traffic congestion, and reduce crowding. Refer to the Introduction to Vol. IA, Chapter 2, Alternatives, for information regarding identification of the Preferred Alternative.

416. Public Concern: The National Park Service should not select Alternative 4 of the *Yosemite Valley Plan*.

“I am very much opposed to Alternative Four because I think we destroy the West Valley, and we inconvenience visitors completely. So I don’t think Alternative Four should be considered any further.” (Public Hearing, Fresno, CA - #20489)

Response: Alternative 4 is a feasible approach for meeting the goals and accomplishing the purpose and need of the *Yosemite Valley Plan*. After a detailed evaluation of all of the *Final Yosemite Valley Plan/SEIS* alternatives, the National Park Service has identified Alternative 2 as the agency’s Preferred Alternative. The National Park Service believes Alternative 2, as modified in the *Final Yosemite Valley Plan/SEIS*, would provide the best approach to preserving the resources that contribute to the splendor of



Yosemite Valley, as well as making those resources available to the public. Refer to the Introduction in Vol. IA, Chapter 2 for additional discussion regarding identification of the Preferred Alternative.

Alternative 5

720. Public Concern: The National Park Service should select Alternative 5 of the *Yosemite Valley Plan*.

“We prefer Alternative 5.” (Individual, Novato, CA - #2296)

“Please consider how much better Alternative 5 is than 2, for saving campsites and housekeeping cabins, and bridges as well. Let’s keep Yosemite family-friendly and keep crossing the river a viable activity.” (Individual, No Address - #1228)

“We evaluated your 5 proposals and #5 would be the best compromise for all involved. Plans 2, 3, & 4 seem to restrict in the extreme. Balance, not limitation should be the goal. Most of the families and individuals that come to the park, park their vehicles and hike, bike, or use valley transportation. The use of huge tour buses, I would wager, pollute far more than the family vehicles. It’s important to keep things in perspective. We hope that plan 5 will be your final choice, it is by far the wisest.” (Individual, San Diego, CA - #4345)

Response: Alternative 5 is a feasible approach for meeting the goals and accomplishing the purpose and need of the *Yosemite Valley Plan*. After a detailed evaluation of all of the *Final Yosemite Valley Plan/SEIS* alternatives, the National Park Service has identified Alternative 2 as the agency’s Preferred Alternative. The National Park Service believes Alternative 2, as modified in the *Final Yosemite Valley Plan/SEIS*, would provide the best approach to preserving the resources that contribute to the splendor of Yosemite Valley, as well as making those resources available to the public. Refer to the Introduction in Vol. IA, Chapter 2 for additional discussion regarding identification of the Preferred Alternative.

63. Public Concern: The National Park Service should modify Alternative 5 of the *Yosemite Valley Plan*.

“I only support Alternative #5. I urge you to rebuild some campgrounds and rebuild a substantial part of Camp Curry Housekeeping. Keep Northside Drive as it is and keep Southside Drive as it is. Please do not destroy any bridges.” (Individual, Capitola, CA - #165)

Response: The National Park Service has evaluated and analyzed Alternative 5 along with the other three action alternatives and the No Action Alternative in both the *Draft* and *Final Yosemite Valley Plan/SEIS*. As a result of this thorough evaluation and analysis, the National Park Service has identified that Alternative 2, as modified in the *Final Yosemite Valley Plan/SEIS*, as the Preferred Alternative that would best achieve the broad goals of the 1980 *General Management Plan* to reclaim natural beauty, allow natural processes to prevail, promote visitor understanding and enjoyment, markedly reduce traffic congestion, and reduce crowding.

However, the National Park Service has revised elements of the Preferred Alternative (Alternative 2) to address Housekeeping Camp, Curry Village, and removal of bridges. Refer to the description of Alternative 2 in Vol. IA, Chapter 2 of the *Final Yosemite Valley Plan/SEIS*.

390. Public Concern: The National Park Service should not select Alternative 5 of the *Yosemite Valley Plan*.

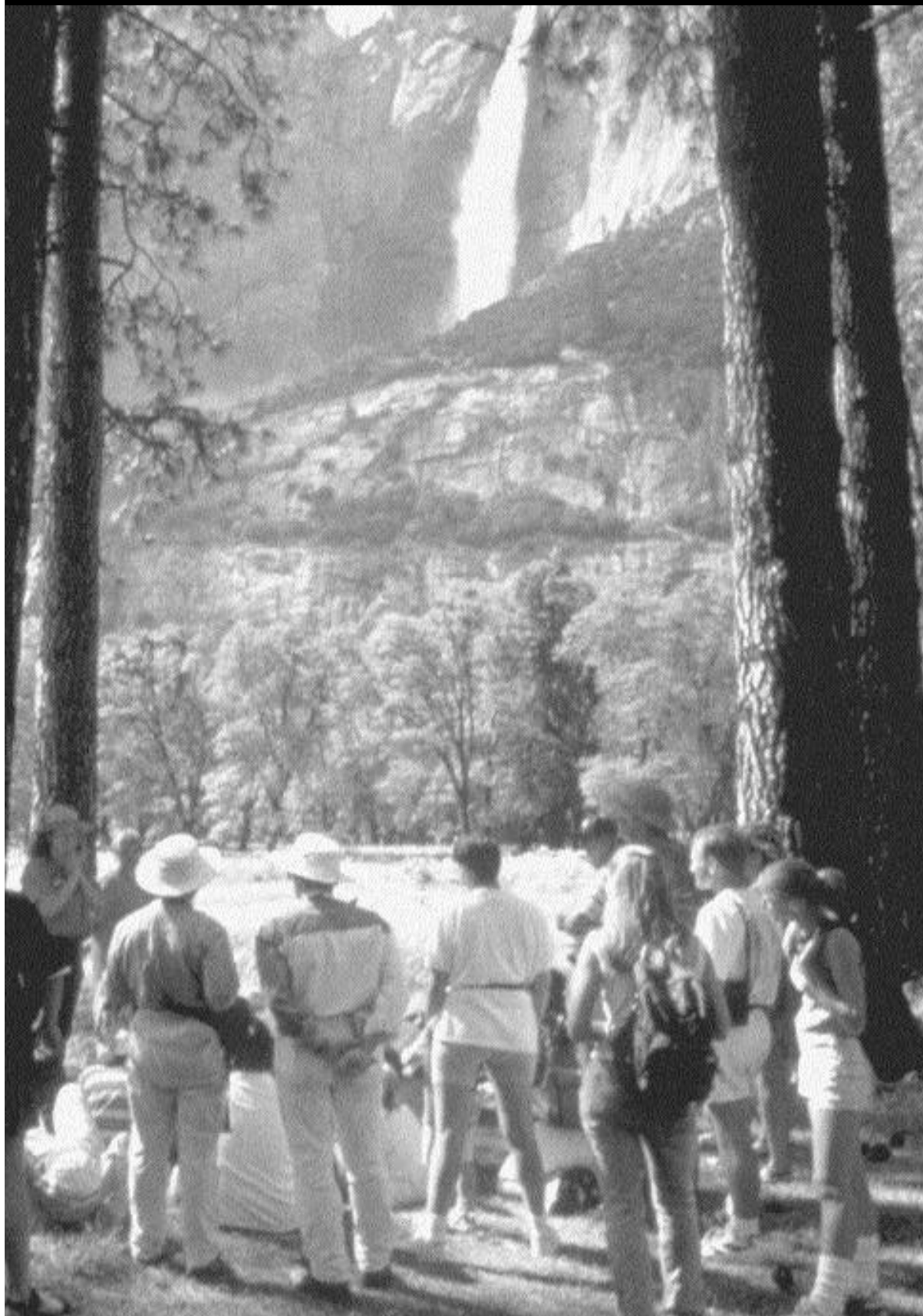
“Alternative 5 seems to emphasize the visitor’s experience to the Valley at the expense of the environment. I am opposed to this management approach. This is similar to the approach that has been used until now and has proven itself unsuccessful by the current degraded status of the Valley. This approach will further damage the qualities of the valley that so many people visit Yosemite to experience. I understand that many people who visit the valley

don't want to have to 'rough it' (you know, travel more than 200 feet from their car for any length of time), and they don't want their access to be limited at all, but those are both necessary for a better quality visitor experience and for the health of the Park." (Individual, Columbia, CA - #4235)

Response: Alternative 5 is a feasible approach for meeting the goals and accomplishing the purpose and need of the *Yosemite Valley Plan*. After a detailed evaluation of all of the *Final Yosemite Valley Plan/SEIS* alternatives, the National Park Service has identified Alternative 2 as the agency's Preferred Alternative. The National Park Service believes Alternative 2, as modified in the *Final Yosemite Valley Plan/SEIS*, provides the best approach to preserving the resources that contribute to the splendor of Yosemite Valley and making those resources available to the public. Please refer to the Introduction in Vol. IA, Chapter 2 for additional discussion regarding identification of the Preferred Alternative.



*Affected
Environment
and
Environmental
Consequences*



Final
Yosemite
Valley
Plan

Supplemental EIS

Chapter 4 ~ Affected Environment and Environmental Consequences

Chapter 4 includes discussion of public comment concerning various aspects of the environment affected by Yosemite Valley planning efforts along with the environmental consequences of these efforts. Public concerns regarding natural, scenic, and cultural resources, special land designations, visitor experiences, transportation proposals, noise considerations, socioeconomic impacts, and Yosemite National Park operations and facilities are analyzed in this chapter.

Section 4.1 ~ Natural Resources

Restoration and preservation of the natural resources in Yosemite Valley is a concern for many individuals and organizations responding to the *Draft Yosemite Valley Plan/SEIS*. Their comments cover a wide range of resource subjects and encompass suggestions regarding management directions, needs for analysis, and additional topics for consideration. Analysis of concerns pertaining to water resources, wetlands, geology, vegetation, wildlife, and air quality are separated into individual sections in this chapter. In this section, the presentation of public comment focuses on general ecosystem processes.

The ecosystem restoration goals of the *Draft Yosemite Valley Plan/SEIS* generate diverse reactions from respondents. “Let’s not pretend that we can or should attempt to recreate ‘wilderness’ in our very domesticated Yosemite Valley,” one person declares. Ecosystems are too dynamic to identify a condition of successful restoration, this individual suggests, thus the National Park System should emphasize visitor experience when evaluating resource management goals. Others identify visitor experience as a reason to advocate ecosystem restoration and preservation as a priority for park management. Claiming that many people who visit Yosemite National Park anticipate a natural setting, these individuals believe park patrons would prefer to see less commercial development. Specifically, some urge the National Park Service to complete ecosystem restoration projects on park-owned properties in Wawona. One conservation organization calls upon park planners to distinguish between upland benches and hillsides when evaluating the cumulative impacts of housing more park staff in El Portal.

40. Public Concern: The *Yosemite Valley Plan* should not emphasize natural restoration and preservation in Yosemite Valley.

“Yosemite Valley is not by any stretch of the imagination what is now called a ‘wilderness area.’ People killed off the major predators . . . in the 19th century. The Valley is covered with aggressive wildflowers and grasses and other plants that come from Europe and elsewhere. The notion of ‘restoration’ is essentially a bogus one, because the Valley can never be restored to its pre-European man situation unless we keep all people out for hundreds of years, after having done massive ecological damage with bulldozing and spraying herbicides to try to kill over all of the now-naturalized plants. . . It is a fools errand to undertake such a monumentally destructive effort. . . The whole notion of ‘environmental restoration’ is chasing the will ‘o the wisp. It is just another form of intensive non-organic gardening, masquerading under the guise of ‘ecology.’ The first thing that one learns when one studies ecology, is that all ecological systems are dynamic. Thing’s are constantly changing; the weather changes; outside pressures in the form of viruses, bacteria and fungi attack both plants and animals. People come from all over the world to see the amazing and sublime geology of Yosemite: the gray towers and sheer walls of granite that surround the narrow Valley. They do not come from all over the world to see native plants being gardened with herbicides being sprayed on their naturalized plant brothers and sisters. If Yosemite management wants to take out the bowling alley, fine.

But let's not pretend that we can or should attempt to re-create 'wilderness' in our very domesticated Yosemite Valley." (Individual, San Carlos, CA - #99)

Response: The goals of the 1980 *General Management Plan*, and thus the *Yosemite Valley Plan*, include allowing natural processes to prevail and protecting and enhancing natural resources. Yosemite National Park proposes to restore natural processes that maintain natural ecosystems in Yosemite Valley to help achieve these goals and objectives. This includes restoring soils to as near natural conditions as possible through decompaction of soils (facilitating oxygen and water infiltration into soils that are currently hydrophobic), adding native organic materials to areas that have been denuded and made barren by trampling and loss of litter and duff; restoration of natural hydrologic conditions through removal of structures that impede the natural flow of surface and subsurface water; restoration of topographic features (particularly old channels, oxbows, and depressions that have been filled in); reintroduction of surface fires that help break down surface litter deposits, recycle nutrients back into the soil, and maintain a more diverse mosaic of vegetation cover; and removal of non-native plant species that impede the re-establishment of native vegetation. All of these processes and features facilitate the re-establishment of natural vegetation cover. These methods have been successfully used for the past 15 years in Yosemite, with proven results.

(Also see responses to Public Concerns #48, #95, and #180.)

58. Public Concern: The *Yosemite Valley Plan* should emphasize preservation of natural resources in Yosemite Valley.

"I applaud your plans to increase and preserve meadows and natural resources throughout Yosemite Valley. Hikers, climbers, birders, and all naturalists will appreciate this effort. As much as possible, the natural rustic nature of Yosemite should be maintained. Upscale, modern commercial hotels can and will develop outside the Park and that is where they belong. Yosemite is known for its hiking, camping, climbing, and nature trails, all situated in a rustic, unspoiled natural environment of grandeur carved out of solid rock over eons of time. If you attempt to change that, you will ruin it." (Individual, Peoria, AZ - #100)

Response: Two principal goals of the *Yosemite Valley Plan* are the preservation and restoration of natural processes and the reclamation of natural beauty. These goals and associated criteria, as well as other goals and criteria for visitor experience and cultural resources are discussed in Vol. IA, Chapter 1, Purpose and Need, Direction for this Planning Effort. The various goals and criteria are intertwined and require balancing to ensure a successful plan.

(Also see responses to Public Concerns #48, #95, and #180.)

274. Public Concern: The National Park Service should restore Yosemite National Park Service lands in Wawona.

"If memory serves, during the '70's when YNPS was actively pursuing and acquiring properties in Wawona, it was stated that these acquisitions would be torn down and the land returned to its 'natural state.' This legal mandate has not been included or addressed in the latest planning effort, and it still hasn't been executed!" (Individual, No Address - #1355)

Response: Each of the action alternatives considered in the *Final Yosemite Valley Plan/SEIS* addresses only those park-owned lands within Section 35 in Wawona that are proposed for development to meet housing needs for employees. Other National Park Service lands in Wawona are outside the scope of this planning effort. However, it continues to be the goal of the National Park Service to restore previously developed lands within Section 35 to natural conditions as funding becomes available. Priorities will be placed on those properties that fall within the River Protection Overlay of the South Fork of the Merced River, in accordance with guidance and direction outlined in the *Merced River Plan/FEIS*, as well as those areas that are impacting potential wetland, riparian, and black oak woodland communities.



546. Public Concern: The *Yosemite Valley Plan* should consider the cumulative impacts of increased human population in El Portal on loss of rare upland bench habitat.

“The DVP does not consider the related and cumulative impacts of increasing human population in El Portal, leading to loss of rare Upland Bench habitat. The Draft VP does not distinguish the rare Upland Benches from the more abundant Hillsides and mistakenly says that the impacts to habitats and wildlife are ‘limited to relatively small areas of upland habitat loss in comparison to the amount of upland habitat present.’ Two of these rare benches are proposed for development – Hillside East and Hillside West – and are areas that need to be protected for both biological and cultural resources and need intensive non-native species removal efforts. All of the existing El Portal development except for upper Old El Portal is already on rare benches which have already sustained significant impacts to both biological and cultural resources.” (Conservation Organization, Yosemite, CA - #7883)

Response: In El Portal, various physical and biotic factors combine to determine the assemblage of plant and animal species that occur in a certain site. Although “upland bench” is not recognized as a discrete plant community or wildlife habitat type under any system of classification, it is apparent that undeveloped sites of this slope and aspect are unusual features in the Merced River Canyon. This is primarily due to past development that has tended to occur on these relatively level areas, especially in El Portal. The questions are, however, whether these bench areas that remain undeveloped support unique assemblages of plant and animals species, and whether the value of these areas outweighs the protection and restoration of high-value habitats in Yosemite Valley that are only able to occur by moving facilities to El Portal. Thorough analysis of the tradeoffs inherent in the action alternatives in the *Final Yosemite Valley Plan/SEIS* has indicated that the answer is “no” to both of these questions.

The benches appear to support denser growths of the plant species that are prevalent on the surrounding hillsides and, therefore, are likely to support more abundant wildlife. But richer habitats are found in the drainages in El Portal and on the north-facing slopes on the south side of the river that would be unaffected by the actions included in the *Final Yosemite Valley Plan/SEIS*. All species of plants or wildlife that are found on benches are also found in these other habitats, and probably in greater abundance.

In a regional, cumulative context, riparian and meadow habitats are the most severely degraded types, both in Yosemite National Park and the Sierra Nevada. This fact, coupled with the proven high value of these habitats to large numbers of species, including many special-status species, has focused actions in the *Final Yosemite Valley Plan/SEIS* on protection and restoration of riparian and meadow habitats. This would require the removal of some facilities from Yosemite Valley and the development of replacement facilities in the El Portal Administrative Site, which was established in 1958 for just such a purpose. While such development in El Portal should be as environmentally sensitive as possible, some impacts would be unavoidable. However, overall actions would allow for the significant improvements to natural resources and visitor experience values.

Section 4.2 ~ Water Resources

This section of the document deals with those public concerns that address potential impacts to the water resources of Yosemite Valley. Respondents' concerns regarding bridges and hydrology, dams and levees, floodplains, hydrogeomorphology, and the restoration of water resources are detailed within this section. The reader should note that public concerns addressing the historical and transportation values of bridges are contained, respectively, in the Section 4.9 ~ Cultural Resources and Section 4.13 ~ Transportation sections of this document. In addition, public concerns regarding any aspect of the Merced River's Wild and Scenic designation are included in the Wild and Scenic River section of this document.

4.2.1 ~ Bridges and Hydrology

Bridge removal is a contentious subject that elicits numerous proclamations from *Yosemite Valley Plan* respondents. Some individuals and groups agree wholeheartedly that the historic bridges need to be removed to allow the Merced River to flow freely. Many others, however, disabuse the notion that the historic bridges actually cause a noticeable, negative impact on the river ecosystem. These respondents ask for clarification on the nature and extent of the bridges' impacts. "If there actually is a reason for removal of the bridges based other than on riparian speculation, then they should be removed, but one wishes the reasons were more clearly demonstrated," ventures one opponent of bridge removal. "The proposal to remove the bridges implies that their effects are reversible," an individual proffers. "I can't see that the presumed benefits of the removal of any of the bridges, uncertain and perhaps small as those benefits might be, outweigh their historic and aesthetic value."

Many members of the public perceive the removal of bridges as a rash, irreversible decision. Several individuals exhort the Park Service to consider mitigation of the bridges' impacts on fluvial mechanics, including overflow channels and culverts, as an alternative to the complete removal of bridges. Rebuilding or restructuring the present bridges so as to ameliorate their negative impacts on hydrology is also offered by others as a way to avoid the bridges' total demolition. Urging the National Park Service to look at the entire watershed for impacts and possibilities for mitigation, an historical preservation society affirms the use of mitigation over removal. "We are convinced," this organization contends, "that significant ecological restoration can take place without the removal of the historic bridges. We believe that the impacts of the historic bridges on the river ecosystem must be isolated from other impacts such as riprap and human tramping, and that these impacts be assessed objectively without predetermining bridge impacts to be by definition negative."

If the National Park Service does indeed go forward with the removal of the historic bridges, the impacts of such a massive undertaking within the Merced River's ecosystem need to be evaluated and mitigated, according to some conservation groups. "Although our organization strongly supports the removal of several Yosemite bridges, these impediments should not be removed until the NPS has a plan to protect the river flows and hydrologic processes to the maximum extent feasible," one organization contends. Another conservation organization wonders how the construction of two new bridges will, according to the *Draft Yosemite Valley Plan/SEIS*, minimize adverse impacts on hydrology and water quality. The Plan "completely lacks description as to how this would occur," states this group.



168. Public Concern: The *Yosemite Valley Plan* should require the removal of bridges from Yosemite Valley.

“I am supportive of removing as many--as limited traffic circulation will allow--of the historic Merced River bridges. These bridges disturb the fluvial mechanics and natural flow of the river.” (Individual, Mariposa, CA - #68)

Response: The action alternatives in the *Final Yosemite Valley Plan/SEIS* propose the removal of several bridges that have adverse impacts to the hydrologic processes of the Merced River (the bridges that are proposed for removal vary by alternative). Bridges can interfere with hydrologic processes by influencing the river’s width, location, and velocity and affect the river’s ability to meander and change course. For example, Sugar Pine Bridge has caused the formation of a cut-off channel, and arched bridges such as Stoneman and Sugar Pine Bridges confine flows and result in channel narrowing. Bridges that interfere with hydrologic processes are in conflict with the *General Management Plan’s* goal to “allow natural processes to prevail” and with the hydrologic process Outstandingly Remarkable Value of the Merced Wild and Scenic River. The *Final Yosemite Valley Plan/SEIS* explains the adverse impacts that bridges can have on the Merced River in Vol. IB, Chapter 4, Environmental Consequences. Further detail can be found in a number of studies that have evaluated impacts of bridges and other human alterations on the Merced River through Yosemite Valley, notably Madej (1991) and Milestone (1978).

However, beside these hydrologic effects, many of the bridges in Yosemite Valley exemplify the National Park Service Rustic Architectural Style and are an important component of the park’s physical history. They provide access across the river and are constructed to visually harmonize with the spectacular scenery of Yosemite Valley. They are listed in the National Register of Historic Places and are considered to be Outstandingly Remarkable Values of the Merced Wild and Scenic River. Therefore, the decision to remove any of these historic resources is a difficult one. The bridges were evaluated using two primary factors: the extent to which they degrade the hydrology of the river, and their continued use as important components of the traffic circulation system. The *Final Yosemite Valley Plan/SEIS* Preferred Alternative proposes removal of Sugar Pine Bridge and associated riverbank revetments, restoration of the riparian corridor, and evaluation of the continuing hydrologic impacts at Stoneman Bridge. If Stoneman Bridge continues to cause unacceptable damage to the river system, this bridge would then be removed.

229. Public Concern: The *Yosemite Valley Plan* should clarify the negative impacts of bridges on the Merced River.

“As for the bridges, one wishes there were more convincing evidence of their negative impact on the river than a general discussion of their ‘restricting run-off flows so as to narrow the river from its former broad riparian habitat.’ From my scanning of the old photos (which one suspects are quite selective), any ‘narrowing’ seems somewhat obscure. Furthermore, if the Stoneman Bridge ‘obstructs the flow and dynamics of the river’ so as to cause less flooding below and consequent curtailment of meadow formation, why is it also considered an error to have dynamited the El Capitan moraine years ago, which would seem to have opened up the passage of the river as is wished for the Stoneman Bridge venue. If there actually is a reason for removal of the bridges based other than on riparian speculation, then they should be removed but one wishes it were more clearly demonstrated.” (Individual, Sanger, CA - #2293)

“I accept the assertion that the bridges affect (or at least have affected) the morphology of the river. However to my untrained eye things don’t look all that different from the way they looked 65 years ago. There is still a sand bar upstream of Housekeeping, and there is still a big water hole by Stoneman Bridge. Haven’t the effects of the bridges stabilized? And have the effects been all that disastrous? The proposal to remove the bridges implies that their effects are reversible, that by removing them the river will revert to its pre-bridge conditions. Is that known, is hydrology such an exact science that such things can be predicted with reasonable certainty? Removal of the bridges replaces known existing effects with unknown or uncertain future effects. That’s scary! I can’t see that the presumed benefits of removal of any of the bridges, uncertain and perhaps small as those benefits might be, outweighs their historic and aesthetic value. But if you save any of them, let one be Stoneman Bridge.” (Individual, Oakland, CA - #7749)

“The demolition of any of the historic bridges in Yosemite Valley would result in significant and unmitigated direct and cumulative adverse impacts to significant historical, architectural and scenic resources. Although the proposed demolition of the historical bridges is to ‘allow the river to meander and change course naturally,’ the fact of the matter is that these bridges have existed in one form or another since the late 1890s and certainly since the 1920s and the 1930s. The ‘course and path’ of the river is already well established with these bridges in place. Further, the impact of these bridges to the river is not measurably different than the large ‘bus size’ boulders and other debris which has landed in the rivers over the many centuries.” (Business, San Diego, CA - #7884)

Response: The Merced River in eastern Yosemite Valley is an alluvial river, where the bed and banks are made up of the same materials that are transported by the river. This makes for dynamic channel conditions as natural erosion and deposition processes cause the river channel to migrate, often over an extensive area. The inherent dynamic nature of alluvial rivers make their coexistence with stationary bridges problematic. Exacerbating this situation is the fact that the bridge itself may cause flow-related changes that result in morphologic changes to the channel.

Hydrologic conditions pertain to the quantity and timing of flow and hydraulic conditions to factors such as depth, velocity, and erosive power, etc. Since alluvial rivers flow through erodible materials, they form channels with characteristics, e.g., width/depth ratio, flow capacity, sinuosity, slope, etc., determined by such factors as flow regime, sediment transport, and valley slope. Additionally, the development of floodplain areas is a characteristic of alluvial rivers. When hydrologic and/or hydraulic conditions change, either through natural or human causes, river channels adjust by erosion and sedimentation processes until stable morphologic characteristics and dimensions can redevelop. Bridges can cause river morphology to adjust by, among other factors, changing the rate, depth, and velocity of flow in the vicinity of the structure.

Bridges rarely span the entire floodplain width of alluvial rivers and do not generally even span the entire natural channel width and, therefore, constrict flow area. During floods this results in a portion of flow that would normally use floodplain areas to be forced under the structure, increasing the amount of discharge experienced by the channel. The higher discharge and reduced flow area cause a backwater effect (a deep, slow velocity area) to form upstream and high velocities to occur near and under the bridge opening.

The effect of these seemingly minor flow-related changes can be profound, both upstream and downstream of the bridge. The reach upstream of the bridge (in the backwater zone) will often develop a mid-channel bar as sediment in transport deposits due to the reduction in velocity. The development of a mid-channel bar can lead to bank instability as the force of the river is directed laterally away from the bar and into the bank. If lateral erosion is permitted to occur, eventual failure of banks that have been stabilized by riparian vegetation may result and cause rapid movement of large quantities of sediment and vegetative debris and possible channel avulsion. In certain cases, such as a Sugar Pine Bridge, lateral instability and the increase of surface water elevation upstream of the bridge can encourage development of a new channel that cuts off a river meander causing many other problems and impacts. In the reaches downstream of the bridge (and also immediately upstream), flow velocity is high. This can cause scour of the banks that form the transition from natural river width to bridge opening width. Directly beneath the bridge velocities are at a maximum and scour is very common. Downstream of the bridge, a mid-channel bar is likely to develop as scoured sediments drop out in the lower velocity environment. As with development of a mid-channel bar upstream of a bridge, lateral channel instability and associated riparian zone problems can result.

The *Final Yosemite Valley Plan/SEIS* explains the adverse impacts that bridges can have on the Merced River in Vol. IA, Chapter 3, Affected Environment, and Vol. IB, Chapter 4, Environmental Consequences. Further detail can be found in a number of studies that have been conducted looking at the impacts of bridges and other human alterations on the Merced River through Yosemite Valley, notably Madej (1991) and Milestone (1978).



565. Public Concern: The *Yosemite Valley Plan* should mitigate impacts caused by Merced River bridges.

“In the event that it is determined in the future that a bridge is doing quantifiable harm to the ecosystem, other bridge-related actions should be attempted first. The feasibility of creating overflow channels around bridges or installing culverts under the bridge abutments that would relieve the impacts of the bridges during high water flows are examples of possible remedies.” (Non-Governmental Organization, San Francisco, CA - #7885)

Response: Consistent with the 1980 *General Management Plan* to allow natural processes to prevail, and to protect the hydrologic process Outstandingly Remarkable Values of the Merced Wild and Scenic River, the National Park Service strives to allow the Merced River to meander, change course, and make other changes through uninterrupted, unaltered hydrologic processes: erosion, deposition, winter flooding, spring runoff, large woody debris in the river channel, etc. Bridges and their abutments interrupt these hydrologic processes, particularly when the abutments are in the river channel and when they do not accommodate flood flows.

The National Park Service has considered modifying the existing bridges, but based on current analysis has determined it to be infeasible at this time. Given the relatively flat, meandering nature of the Merced River and its associated floodplain through Yosemite Valley, it would be challenging to alter a bridge to allow natural river hydrology to occur without compromising the bridge’s historic integrity.

Bridges constructed in Yosemite Valley in the future would be designed to allow the hydrologic processes of the Merced River to function naturally, and would conform with the historic character of other bridges and structures in Yosemite Valley.

284. Public Concern: The *Yosemite Valley Plan* should require the restructuring of bridges in Yosemite Valley.

“Rather than eliminating the stone bridges, restructure them so that they will not obstruct or be otherwise detrimental to the river environment during the spring runoff.” (Individual, Fresno, CA - #2962)

“I understand that many of the bridges now on the Merced River impede its flow during floods. This should not be allowed to continue. I see no necessary reason to keep the Sugar Pine Bridge, and the Ahwahnee Bridge and they should go. I think that bridges should be at all the other present bridge locations. However, those bridges, including Stoneman, should be rebuilt so that they do not impede flow of the Merced River at any time, particularly during flood conditions. The fact that the present bridges are historical is irrelevant. Mistakes should be corrected even if they are historical.” (Individual, Modesto, CA - #3538)

Response: In order to be consistent with the 1980 *General Management Plan* goal of allowing natural processes to prevail, and of protecting the hydrologic process Outstandingly Remarkable Values of the Merced Wild and Scenic River, the National Park Service strives to allow the Merced River to meander, change course, and make other changes through uninterrupted hydrologic processes: erosion, deposition, winter flooding, spring runoff, large woody debris in the river channel, etc. Bridges and their abutments interrupt these hydrologic processes, particularly when the abutments are in the river channel and when they do not accommodate flood flows.

The National Park Service has investigated making modifications to the existing bridges in Yosemite Valley in order to lessen their impacts to hydrologic processes (Madej 1991, USDOT-FHA 1998). These potential modifications are short-term solutions, or do not adequately address impacts to hydrologic processes, or are such major modifications that they undermine the historic integrity of the bridge.

Bridges constructed in Yosemite Valley in the future would be designed to allow the hydrologic processes of the Merced River to function naturally, and would conform with the historic character of other bridges and structures in Yosemite Valley.

530. Public Concern: The *Yosemite Valley Plan* should assess the impacts of the historic bridges on the Merced River independently from other impacts.

“The National Trust does not dispute that the bridges have an impact on the Merced River, and that these impacts may be locally significant. We also recognize that the current Merced River ecosystem is severely stressed. We are convinced, however, that significant ecological restoration can take place without the removal of the historic bridges. We believe that the impacts of the historic bridges on the river ecosystem must be isolated from other impacts such as rip-rap and human tramping, and that these impacts be assessed objectively without predetermining bridge impacts to be by definition negative.” (Non-Governmental Organization, San Francisco, CA - #7885)

Response: Milestone (1978) and Madej (1991) found that each of the 11 bridges across the Merced River in Yosemite Valley constrict the river to varying degrees, and that there were other human-caused alterations to the Merced River ecosystem (roads that act as dikes, hardened shorelines, loss of riparian vegetation, etc.). The principal adverse impacts of bridges to hydrologic processes are channel widening, channel scour, and mid-stream bar formation that occurs when a bridge does not accommodate flood flows and acts as a dam. These adverse impacts also result in loss of riparian vegetation.

One of the five goals of the *General Management Plan* is to “allow natural processes to prevail”:

“The Yosemite environment is not a static accumulation of geologic and biologic features but rather a dynamic system of interrelated and evolving forms. Therefore, if this environment is to be preserved, the natural processes that are occurring there must be understood and allowed to prevail...”

The bridges, particularly Sugar Pine and Stoneman, are static objects that interfere with the “dynamic system” described in the *General Management Plan*.

Many restoration projects have removed riprap, restored riparian vegetation, and temporarily closed restored areas to visitor use. The bridges continue to create a significant adverse impact on water resources, hydrologic processes, and riparian vegetation, and the success of future restoration projects depends on their fate.

475. Public Concern: The *Yosemite Valley Plan* should include mitigation measures for the removal and construction of bridges in Yosemite Valley.

“The Service identifies no mitigation measures to protect the river during the removal or construction of bridges in the Valley. Although our organizations strongly support the removal of several Yosemite bridges, these impediments should not be removed until the NPS has a plan to protect the river flows and hydrologic processes to the maximum extent feasible.” (Conservation Organization, San Francisco, CA - #4594)

“Two bridges would be added which would constrict the river. The natural meandering of the river would also be impacted by changes to the flood protection levee. Also proposed are additions to infrastructure at Railroad Flat. The Draft VP says these changes would minimize adverse impacts on hydrology and water quality, but completely lacks description as to how this would occur.” (Conservation Organization, Yosemite, CA - #7883)

Response: To ensure that a high standard of protection of resources and values occurs, all potential future actions that could occur under each of the action alternatives proposed in the *Final Yosemite Valley Plan/SEIS* would apply a consistent set of measures to mitigate for potential environmental and social impacts. Mitigation measures relevant to the removal and construction of bridges in Yosemite Valley are included in Vol. IA, Chapter 2, Alternatives, Mitigation Measures Common to all Action Alternatives.

Examples of mitigation measures relevant to bridge removal or construction include: sustainable design; measures to reduce water pollution; measures to protect rare, threatened, and endangered species; scheduling of construction activities during periods of low groundwater; use of silt fences in construction areas to reduce erosion and surface scouring; revegetation plans for the disturbed area; employment of



dust abatement measures; choosing bridge materials that are compatible with the landscape; and compliance with the Programmatic Agreement for cultural resources.

Sustainable design is particularly important for construction of new facilities, such as bridges. If a new bridge were constructed in Yosemite Valley it would be designed to accommodate flood flows and to the greatest degree possible allow the Merced River to meander and change course. New bridges in El Portal for the multi-use paved trail would be constructed and designed to accommodate flood flows, particularly flows of high velocity like those experienced in January 1997.

4.2.2 ~ Dams and Levees

Many respondents hold differing views on the subject of retaining levees in Yosemite Valley. One conservation organization questions how the proposed construction of levees, designed specifically to control and divert the Merced River's flow, will be consistent with the *General Management Plan's* intent to "let natural processes prevail." Conversely, another conservation group believes that the El Portal levee should be maintained. "The levee held its ground during the 1997 flood and, despite its rather unorthodox design, does not appear to have suffered permanent damage," the group suggests.

Numerous individuals wish to see the Cascades Diversion Dam removed in an environmentally responsible way, without any commensurate road widening projects linked to the dam's removal. One individual, however, questions why the National Park Service would consider removing a dam without first analyzing the environmental consequences of such an action. "Removing or breaching the dam would allow the river to entrench the gravel deposit that had accumulated in the pool, sending a slug of sand and gravel downstream that would sediment pools throughout the gorge and eventually reduce (albeit very slightly) the storage capacity of Lake McClure, with attendant impacts on downstream agriculture and fisheries," this person asserts. The environmental consequences of this project should be analyzed, this person believes, before any decision is made.

533. Public Concern: The National Park Service should clarify how levee construction and water diversion are consistent with the direction of the *General Management Plan*.

"How is the proposed construction of 'levees to divert water flow and remove areas from the 100-year floodplain,' consistent with the declared intent to 'let natural processes prevail?' Construction of levees is--and historically has always been--for the purpose of preventing the consequences of natural processes." (Conservation Organization, Mariposa, CA - #9224)

Response: In order to remove facilities from Yosemite Valley as envisioned by the *General Management Plan*, it is necessary to develop new facilities in areas outside of Yosemite Valley. The *Final Yosemite Valley Plan/SEIS* proposes removing facilities that interfere with natural processes from Yosemite Valley (e.g., some bridges, campsites, roads), with particular importance placed on protecting the Merced River and restoring natural communities and processes in the River Protection Overlay. The *Final Yosemite Valley Plan/SEIS* presents a range of alternatives that include potential new facilities in El Portal, Foresta, and Wawona. Because of the intended purpose of the El Portal Administrative Site, many of these new facilities are proposed to be located in El Portal, and some of these facilities may have to be located in the floodplain and there may be a need for flood protection structures such as levees. Consistent with the legislation that established the El Portal Administrative Site, the *General Management Plan* intended El Portal to be the site of park headquarters and the base of many park operations.

Generally, in acknowledging the Merced Wild and Scenic River's Outstandingly Remarkable Values, highly valued resources, and floodplain considerations (including Executive Order 11988, Floodplain Management, and the National Park Service *Floodplain Management Guideline* 1993), the action alternatives in the *Final Yosemite Valley Plan/SEIS* restrict new development or redevelopment within the floodplain, except where alternative locations are not feasible due to other resource constraints (e.g., rockfall hazard, sheer cliffs, cultural resources, threatened or endangered species, or scenic resources). Where no alternatives exist, and with a formal statement of findings (refer to Vol. II, Appendix N), policies allow construction of structures, such as day-visitor parking facilities, picnic areas, and campgrounds to be built within the floodplain if risks to human life and property are studied and then minimized or mitigated through design (e.g., construction of finished floors above the elevation of the 100-year floodplain, construction of levees to divert water flow and remove areas from the 100-year floodplain, and preparation of an emergency preparedness plan for facilities within the floodplain).

477. Public Concern: The *Yosemite Valley Plan* should require the retention of the levee in El Portal.

"We support the following proposition--retention of the existing levee. The levee held its ground during the 1997 flood and, despite its rather unorthodox design, does not appear to have suffered permanent damage. If later examinations of the levee in fact suggest that repairs are needed, we urge the Park Service to permit (and the YVP to specify) only the least amount of necessary work. The last thing the public wishes to view on Highway 140 (and hopefully the last thing the Park Service wishes to take upon itself) is a massive scarring and excavation of the Merced River watershed." (Conservation Organization, San Francisco, CA - #4594)

Response: The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* proposes to increase the height and length of the flood protection levee in El Portal to protect housing units at Hennessey's Ranch, and anticipates the continued existence of the levee along State Route 140 in the vicinity of the El Portal Market and the El Portal Ranger Office. A flood wall may also be necessary at Railroad Flat. These actions would need to be consistent with the applicable management zoning, the River Protection Overlay, and the Wild and Scenic Rivers Act (WSRA) as described in the *Merced River Plan/FEIS*, as well as Executive Order 11988 on Floodplain Management, and the National Park Service *Floodplain Management Guideline* (1993).

Under the Wild and Scenic Rivers Act, the National Park Service is charged with maintaining whenever possible the free-flowing nature of the Merced River as it runs through Yosemite National Park. Section 7 of the Act (16 USC 1277) requires a rigorous process to ensure that proposed "water resources projects," implemented or assisted by federal agencies within the bed and banks of designated rivers, do not have a "direct and adverse effect" on the values for which the river was designated. "Water resources projects" include hydroelectric projects, dam or water diversions, fisheries habitat and watershed restoration, bridges and other roadway construction or reconstruction, bank stabilization, channelization, levees, boat ramps, and fishing piers that occur within the bed and banks of a designated Wild and Scenic River (Interagency Wild and Scenic Rivers Coordinating Council 1999).

275. Public Concern: The *Yosemite Valley Plan* should require the removal of the Cascade Diversion Dam and riprap along the Merced River.

"Remove Cascade Dam and the riprap along the River." (Public Hearing, Merced, CA - #20101)

Response: Each of the action Alternatives in the *Final Yosemite Valley Plan/SEIS* propose the removal of the Cascade Diversion Dam. However, further environmental compliance would be necessary before the dam could be removed. In addition, the document calls for the reconstruction of El Portal Road between the dam and Pohono Bridge, which would also require further environmental compliance and could be affected by the removal of the dam. Environmental compliance typically includes mitigation measures to



reduce or eliminate adverse impacts. Under the permit issued to the National Park Service by the U.S. Army Corp of Engineers, bank restoration is also required in the area of the dam removal.

Riverbank restoration projects under all action alternatives of the *Final Yosemite Valley Plan/SEIS*, would include, where feasible, the removal of riprap and other unnatural slope protection along reaches of the Merced River in Yosemite Valley. However, riprap or rock armor is necessary in some cases to protect the riverbank and maintain structural integrity of roads, bridges, or other structures.

The El Portal Administrative Site was established by Congress in 1958 (P.L. 85-922) “in order that utilities, facilities, and services required in the operation and administration of Yosemite National Park may be located on such site outside the park.” The act also stated that the site would “not become part of Yosemite National Park, nor be subject to the same laws and regulations governing said park.” Accordingly, constraints on development in the 100-year floodplain and the use of riprap in El Portal are different from constraints inside the park.

In both Yosemite Valley and El Portal, the provisions of the *Merced River Plan/FEIS* would guide and constrain actions potentially affecting the Merced River.
(Also see response to Concerns #533 and #3.)

239. Public Concern: The *Yosemite Valley Plan* should require environmentally responsible techniques for the removal of Cascades Diversion Dam.

“Be environmentally responsible with the removal of Cascades Dam.” (Individual, San Francisco, CA - #1212)

Response: While the *Final Yosemite Valley Plan/SEIS* calls for the removal of the Cascades Diversion Dam, further environmental compliance would be necessary before the dam could be removed. In addition, the plan calls for the reconstruction of El Portal Road between the dam and Pohono Bridge, which would require further environmental compliance and could be affected by the removal of the dam. Environmental compliance typically includes mitigation to reduce or eliminate adverse impacts associated with an action.

The National Park Service has studied the removal of the dam, including different removal techniques and different methods of treatment for the sediment that has accumulated behind the dam. For further information see NPS Environmental Assessment for Electrical Distribution System Replacement and Cascade Dam Removal (1987), and USGS Assessment of Hydraulic Changes Associated with Removal of Cascade Dam (1989).

The U.S. Army Corps of Engineers granted the National Park Service a permit to remove Cascades Diversion Dam in June 1998. Under this permit, the National Park Service is required to comply with all the applicable provisions and special conditions to ensure protection of the environment, including erosion and siltation controls, aquatic life movements, and endangered species. In addition, the National Park Service would comply with the requirements of the Wild and Scenic Rivers Act, including the Section 7 determination process.

240. Public Concern: The *Yosemite Valley Plan* should not link dam removal to road widening.

“Don’t link the [Cascades] dam removal to more road widening.” (Individual, San Francisco, CA - #1212)

Response: The removal of the Cascades Diversion Dam does not depend on the widening of the El Portal Road or the Big Oak Flat/El Portal Road intersection improvements and is consistent with the goals of the *Merced River Plan/FEIS*. On the other hand, the road and intersection improvements are partially dependent on the removal of the dam, the subsequent response of the river, and may require further environmental compliance. Thus, it is likely that these two projects would be implemented in two phases.

The first phase would entail removing the dam and allowing the river to flow unimpeded for a period sufficient for the channel to stabilize and to assess its eventual course. After that period of assessment, phase two, road widening and intersection improvement, would be evaluated.

346. Public Concern: The National Park Service should analyze the environmental impacts of removing the diversion dam.

“Though low, the diversion dam does impound a scenic pool; replacing that pool with an eroded gravel terrace would be visually and environmentally destructive. Removing or breaching the dam would allow the river to entrench the gravel deposit that had accumulated in the pool, sending a slug of sand and gravel downstream that would sediment pools throughout the gorge and eventually reduce (albeit very slightly) the storage capacity of Lake McClure, with attendant impacts on downstream agriculture and fisheries. That removal reappears in alternative after alternative with no analysis of these impacts or their mitigation suggests a triumph of dogmatism over analysis that is altogether inappropriate in an EIS.” (Individual, Oakland, CA - #3835)

Response: While the *Final Yosemite Valley Plan/SEIS* calls for the removal of the Cascades Diversion Dam, further environmental compliance would be necessary before the dam could be removed. Environmental compliance typically includes mitigation measures to reduce or eliminate adverse impacts associated with an action, such as the treatment of accumulated sediment in the pool upstream of the dam. The National Park Service has studied the removal of the dam, including different removal techniques and different methods of sediment treatment. For further information see NPS Environmental Assessment for Electrical Distribution System Replacement and Cascade Dam Removal (1987), and USGS Assessment of Hydraulic Changes Associated with Removal of Cascade Dam (1989).

4.2.3 ~ Floodplains

Floodplains and the development contained within them are topics of concern for many *Draft Yosemite Valley Plan/SEIS* respondents. Several respondents seek clarification of the seemingly contradictory mandates in the *Draft Yosemite Valley Plan/SEIS* regarding floodplains. “Mention was made of the importance of pulling back buildings from the floodplain,” states one individual. “Why then are you planning to replace the buildings at Yosemite Lodge that were lost to the flood?” Another person remarks, “You list all of the facilities located within the floodplain of the Merced, but offer no explanation whatsoever on how you determined what would be kept, what would be rebuilt and what would be removed.” Conversely, one respondent feels that floodplains and development are not mutually exclusive. Citing the example of the Rhine and Main Rivers in Germany, this person points out that these rivers are expected to inundate their floodplains each spring. “The playground and picnic equipment are removed,” this person ventures. “The trails are closed and in the late spring fresh sand is put in the sand boxes. How can you justify not using the flood plain?” Such a strategy could be implemented to continue using Housekeeping Camp at its present capacity, according to this individual.

While some respondents believe that the National Park Service should remove all facilities located within the 100-year floodplain of the Merced River, others question the adequacy of analysis regarding floodplain development. “I find it extremely disheartening that you did not include an alternative that considered the removal of all facilities from the floodplain. Being that the MRP dictates how YVP will be implemented, I question the adequacy of analysis done on floodplain development,” comments one citizen. Another individual believes that the *Final Yosemite Valley Plan/SEIS* should contain detailed maps of the Merced River’s 100-year floodplain. Such a map would assist in the location and protection of Merced River Outstandingly Remarkable Values, according to this respondent.



The past and planned reconstruction of the El Portal Road and its impact on the Merced River watershed elicits many comments. The National Park Service should devise mitigation measures for the major adverse hydrologic and scenic impacts created by reconstruction of the El Portal Road, according to one conservation organization. This group believes, “By creating and articulating greater mitigation measures in the final plan, the park service can forestall some of the public and controversial visual and ecological impacts that typically accompany road construction along the Merced.” Yet another conservation group suggests that the *Final Yosemite Valley Plan/SEIS* account for cumulative impacts on the El Portal segment of the Merced River Canyon. Noting past construction in the El Portal canyon, this organization chides, “No valid measurement of cumulative impacts is provided, and it is as though nothing ever happened in the Merced Gorge and that no land area, hydrology, wildlife, or plants were ever disturbed.” A cumulative impacts analysis, this group insists, should be included in the *Final Yosemite Valley Plan/SEIS*.

181. Public Concern: The National Park Service should clarify the *Yosemite Valley Plan*’s management direction regarding floodplain development.

“Mention was made of the importance of pulling back buildings from the floodplain. Why then are you planning to replace the buildings at Yosemite Lodge that were lost to the flood?” (Individual, Walnut Creek, CA - #84)

“You list all of the facilities located within the floodplain of the Merced, but offer no explanation whatsoever on how you determined what would be kept, what would be rebuilt and what would be removed. Volume 1A states, ‘These structures or developed areas may be inconsistent with the NPS Floodplain Management Guidelines or Executive Order 11988 because these administrative requirements were imposed after the facilities were constructed.’ Are you trying to say that you aren’t going to move these facilities out of the floodplain because you legally don’t have to? You and I both know that to restore the Merced River to a truly natural system, man-made impediments need to be removed from the river’s natural path. I find it extremely disheartening that you did not include an alternative that considered the removal of all facilities from the floodplain. Being that the MRP dictates how YVP will be implemented, I question the adequacy of analysis done on floodplain development.” (Individual, Missoula, MT - #7257)

“What about Housekeeping Camp? A rich tradition for my family and many others. The concrete and stone uprights are waterproof. The stoves, beds, pantries and canvas can be removed by Nov.1. We lived in Germany in 1995-97 where the Rhine and Main rivers are expected to rise 3-4 meters above their banks every spring. The playground and picnic equipment are removed. The trails are closed and in the late spring fresh sand is put in the sand boxes. How can you justify not using the flood plain?” (Individual, Jackson, CA - #1494)

Response: Yosemite National Park currently operates under Executive Order 11988, Floodplain Management, and the National Park Service *Floodplain Management Guideline* (1993), which provide guidance for the minimization of hazard to life and property and protection of natural floodplain values in the national park system. One of the goals of the 1980 *General Management Plan* is to allow natural processes, such as flooding, to prevail in the park. In addition, an active flood regime is a component of the hydrologic process Outstandingly Remarkable Value of the Merced Wild and Scenic River in Yosemite Valley. Both the *General Management Plan* and the *Merced River Plan* envision the natural hydrologic process of flooding to be unimpaired by human activities, including structures. The *Yosemite Valley Plan* would implement this vision by removing as many structures as is feasible from the 100-year floodplain.

Also, in accordance with the Executive Order, National Park Service guidelines, the *General Management Plan*, and the *Merced River Plan*, the *Final Yosemite Valley Plan/SEIS* proposes the removal of a number of facilities from the 100-year floodplain of the Merced River in Yosemite Valley to reduce hazards to life and property and to restore floodplain values. Existing facilities within the floodplain could be flood-proofed to reduce hazard to life and property, but the adverse impacts of the

structures to floodplain values would continue. New facilities could be constructed in the floodplain if it were not feasible to locate the facility elsewhere; these facilities would be subject to standard mitigations of facilities in floodplains. For example, lodging units would be removed from the 100-year floodplain at Yosemite Lodge, and any new lodging units at Yosemite Lodge would be constructed outside of the 100-year floodplain.

In the *Final Yosemite Valley Plan/SEIS*, facilities in Yosemite Valley, El Portal, and Wawona that are within the 100-year floodplain of the Merced River are listed in the Floodplains section of Vol. IA, Chapter 3, Affected Environment. Vol. IB, Chapter 4, Environmental Consequences, discusses the impacts of facilities in the floodplain. A floodplain hazard assessment, known as a Statement of Findings, has been prepared by the National Park Service Water Resources Division and is included in Vol. II, Appendix N.

Please note that in Vol. IA, Chapter 2 the Preferred Alternative does not propose the rebuilding of any portion of Yosemite Lodge in the 100-year floodplain.

252. Public Concern: The *Yosemite Valley Plan* should remove all facilities in the 100-year floodplain.

“Remove all facilities in the 100-year floodplain.” (Public Hearing, Merced, CA - #20101)

Response: Consistent with Executive Order 11988, Floodplain Management, the National Park Service *Floodplain Management Guideline* (1993), the 1980 *General Management Plan* goal of allowing natural processes to prevail, and the *Merced River Plan* goal to protect and enhance the hydrologic process Outstandingly Remarkable Value for the Yosemite Valley segment, the *Final Yosemite Valley Plan/SEIS* proposes the removal of a number of facilities from the 100-year floodplain of the Merced River in Yosemite Valley and limits new development or redevelopment.

These policies and plans allow development in the floodplain where alternative locations are not feasible due to other constraints (e.g., rockfall hazard, sheer cliffs, cultural resources, threatened or endangered species, scenic resources). Examples of development that can be placed in the floodplain include day-visitor parking areas, picnic areas, and campgrounds. When development in the floodplain is proposed, risks to human life and property must be minimized or mitigated through design (e.g., construction of finished floors above the elevation of the 100-year floodplain, construction of levees to divert water flow and remove areas from the 100-year floodplain, preparation of an emergency preparedness plan for facilities within the floodplain), and a Statement of Findings must be prepared.

The El Portal Administrative Site was established by Congress in 1958 (P.L. 85-922) “in order that utilities, facilities, and services required in the operation and administration of Yosemite National Park may be located on such site outside the park.” The act also stated that the site would “not become part of Yosemite National Park, nor be subject to the same laws and regulations governing said park.” Accordingly, floodplain development constraints in El Portal are different from constraints inside the park; however, risks to human life and property must still be minimized or mitigated.

In both Yosemite Valley and El Portal, the provisions of the *Merced River Plan/FEIS* would guide and constrain actions potentially affecting the Merced River.
(Also see response to Concerns #533 and #3.)

551. Public Concern: The National Park Service should accurately map the Merced River’s 100-year floodplain.

“NPS has failed to map and consider the Merced’s 100-year flood limits, channel morphology and migration, associated wetlands, and Terminal Moraine restoration. NPS has failed to map ‘normal bankfull high water’ (which



in Yosemite is the Spring Flood, covering many acres of meadow). The 100-year floodplain has never been mapped. These kinds of maps would hold many keys to proposing specific, located protections for the Merced River and provide dimensions upon which to build further detailed, located study and specific protection of the Merced's ORV's." (Conservation Organization, Yosemite, CA - #7883)

Response: In 1981, the U.S. Army Corps of Engineers delineated the predicted 100-year floodplain of the Merced River in Yosemite Valley, and revised their prediction in 1991. In January 1997, the National Park Service mapped the flood extent levels in Yosemite Valley following the largest flood event since the installation of the stream gauge at Happy Isles in 1916. The January 1997 flood revealed serious flaws in the U.S. Army Corps of Engineers prediction: some areas that were supposed to flood did not flood, and some areas flooded that were not supposed to flood, according to the U.S. Army Corps of Engineers data. The National Park Service believes that the 1997 flood extent data is a more accurate representation of the 100-year floodplain than the U.S. Army Corps of Engineers prediction.

In 1998 and 2000, Stantec Inc. (formerly Cella Barr and Associates) mapped the predicted 100-year, 25-year, 10-year, and 2-year floodplain in east Yosemite Valley from Happy Isles to Swinging Bridge using an updated hydrologic model incorporating the 1997 flood data and updated topographic information (Stantec 2000; Cella Barr and Associates 1998). The 1998 and 2000 predicted flood extents in east Yosemite Valley from Stantec data, combined with the mapped 1997 flood extent in west Yosemite Valley, is considered the most accurate available 100-year floodplain prediction for this section of the Merced River corridor.

In El Portal, the predicted 100-year floodplain was delineated by the U.S. Army Corps of Engineers in 1991, and was revised following the January 1997 flood.

The predicted floodplain extent in Yosemite Valley and El Portal provided guidance during the alternative development process (see Vol. IA, Chapter 2, Development Considerations) and was used to evaluate environmental consequences for water resources (see Vol. IB, Chapter 4, Environmental Consequences, Floodplains) in both the *Draft* and *Final Yosemite Valley Plan/SEIS*. In addition, the *Final Yosemite Valley Plan/SEIS* includes an appendix with a Floodplain Statement of Findings (see Vol. II, Appendix N) for the Merced River in Yosemite Valley and El Portal. The Statement of Findings identifies the potential hazards and risks associated with development within the 100-year floodplain and evaluates the feasibility of removing or retaining facilities within these areas.

611. Public Concern: The *Yosemite Valley Plan* should include mitigation measures for the adverse hydrologic and scenic impacts created by the reconstruction of the El Portal Road.

"The NPS must devise mitigation measures for the major adverse hydrologic and scenic impacts created by reconstruction of El Portal Road between Cascades Diversion Dam and the Pohono Bridge. The draft YVP identifies no mitigation for the visual impacts created by the presence of construction activities, and little mitigation for the hydrologic damage created by the presence of bank stabilization materials. By creating and articulating greater mitigation measures in the final plan, the Park Service can forestall some of the public and controversial visual and ecological impacts that typically accompany road construction along the Merced." (Conservation Organization, San Francisco, CA - #4594)

Response: A list of mitigation measures common to all action alternatives can be found in the *Final Yosemite Valley Plan/SEIS*, Vol. IA, Chapter 2, Alternatives. Mitigation measures associated with road construction projects include sustainable design and aesthetics that minimize impacts to hydrology and scenery, revegetation, construction practices that minimize impacts to resources and visitors, etc.

The reconstruction of the El Portal Road between Cascades Diversion Dam and Pohono Bridge would be preceded by the removal of the Cascades Diversion Dam. The final design for this segment of road is partially dependent on the removal of the dam and the response of the river to the removal of the dam;

therefore, the design for this segment of road has not been finalized. Subsequent environmental compliance would be necessary before the reconstruction of this segment can proceed, and specific mitigation measures would be a component of this compliance.

Pursuant to the Wild and Scenic Rivers Act and the *Merced River Plan/FEIS*, this project would be considered a water resources project and would be subject to a Wild and Scenic Rivers Act Section 7 determination. This would strive to avoid direct and adverse impacts to Outstanding Remarkable Values, particularly the hydrologic processes and scenic Outstanding Remarkable Values of this segment.

539. Public Concern: The *Yosemite Valley Plan* should account for cumulative impacts on the El Portal segment of the Merced River Canyon.

“El Portal is a segment of Canyon and riparian zones which are the most threatened in the Sierra (Sierra Nevada Ecoregion Project). Yet, no valid measurement of cumulative impacts is provided, and it is as though nothing ever happened in the Merced Gorge and that no land area, hydrology, wildlife, or plants were ever disturbed.” (Conservation Organization, Yosemite, CA - #7883)

Response: Reconstruction of the El Portal Road between the park boundary at El Portal and the Cascades Diversion Dam is currently underway, and therefore is outside the scope of this planning effort. However, it is analyzed in the *Final Yosemite Valley Plan/SEIS* as a “present” cumulative impact project (see Vol. IB, Chapter 4, Environmental Consequences, Cumulative Impacts section of each impact topic). Mitigation measures for this construction project are being implemented as the project nears completion. Examples of measures being employed include weed control at staging areas and throughout the project site, construction compliance monitoring, revegetation, fencing of sensitive resource areas, and long-term monitoring.

4.2.4 ~ Hydrology and Geology

Several respondents feel that past human actions in Yosemite Valley have altered the natural hydrogeomorphic processes of the Merced River. To restore hydrologic and geologic balance, many suggest that the National Park Service restore the El Capitan moraine. “Partially restoring the terminal moraine would surely extend the wetting and flooding of meadows from El Capitan through Leidig, and possibly as far as Ahwahnee,” one respondent maintains.

Offering a different restorative measure, another respondent believes raising the Merced River bed will lead to increased inundation of the meadows and a commensurate retreat of the encroaching woodlands. This person suggests a novel source of materials for this proposed mitigation project: “Some of the boulders from the dismantled Stoneman and other bridges proposed for removal might be useful.” Although this project alone may not ensure the restoration of the meadows, this individual feels that “the prospect of raising the water table a few feet should encourage you to at least discuss the costs and probable advantages in the FEIS.”

Note: One response is provided for concerns #347 and #467, and is placed following concern #467.

347. Public Concern: The National Park Service should consider restoring the El Capitan terminal moraine.

“The lowered water table near El Capitan is among the most prominent of the historical changes to Yosemite Valley. Partially restoring the terminal moraine would surely extend the wetting and flooding of meadows from El Capitan through Leidig, and possibly as far as Ahwahnee. A higher water table, together with annosus fungus will eventually expand some of the floodplain meadows and open-up nearby woodlands. To go much beyond this towards recreating the more expansive grasslands of 1866 would neither be more natural (because the pre-historic burn



frequency appears to have been anthropogenic), nor be more attractive. I recommend shallowing Clark's deep and narrow channel through the moraine by only two or three feet, then waiting decades before deciding whether to add more. Several large rocks may be required, as Clark's deep channel appears to have been swept clear of mere boulders." (Individual, Oakland, CA - #3835)

Response: See response following concern #467 below.

467. Public Concern: The National Park Service should consider raising the Merced River bed.

"Bed stability is an argument for raising the bed rather than accepting it as it now is. In the NPS technical Report 92/10 by Smillie, Jackson and Martin in May 1992, they present reasons for raising the river bed, although they are not sure that that alone will entirely push back the trees encroaching on the meadow. A stable bed and the prospect of raising the water table a few feet should encourage you to at least discuss the costs and probable advantages in the FEIS. A stable river bed tells me that if a wide thick foundation could be placed with confidence it will stay put. Perhaps large boulders might be through-bolted to that foundation to provide a mostly natural looking barrier of perhaps 4.5 feet height as a first step as they suggest. Some of the boulders from the dismantled Stoneman and other bridges proposed for removal might be useful." (Individual, Twain Harte, CA - #7633)

Response: One of the goals of the 1980 *General Management Plan* is to "allow natural processes to prevail." When natural processes have been impaired by human influences and are not functioning properly, the National Park Service intervenes to restore the natural processes and mimic their influence, as well as restore the resources that have been damaged or lost due to the interruption of natural processes. As an example, the altered water regime in meadows has resulted in the encroachment of conifers into the meadows, and the National Park Service regularly burns the meadows in order to control the encroachment. However, restoration programs that mimic the influence of a natural process are imperfect, and care must be taken to avoid impacts to other natural processes or natural and cultural resources.

Constructing terraces in the Merced River east of the terminal moraine would impede river flow and not allow natural river processes to prevail. In addition, constructing terraces in the Merced River to impede river flow would not comply with the guidance and direction provided in the *Merced River Plan/FEIS* associated with not impeding natural river flow.

This response also applies to concern #347.

4.2.5 ~ Impacts, Mitigation, and Restoration

Bridges, dams, levees, and roads manifestly impact water resources and are often mentioned in the public's comments. Citizens also ask that a variety of possible water contaminants be considered including non-point source pollutants, storm water runoff, and stock effluent.

An increase of in the human population of El Portal, one respondent remarks, could lead to increased non-point source pollutants including pollution derived from "parking lots, residential and working facilities, and vehicle deposits on road beds." Such pollutants, "may adversely affect populations of aquatic insects, especially those that are sensitive to pollution, which may adversely affect bat, bird and fish populations," this individual attests. The *Final Yosemite Valley Plan/SEIS* should consider the cumulative impacts such a population increase may have on water resources, according to this citizen.

Another individual believes that the *Final Yosemite Valley Plan/SEIS* should include storm water mitigation measures, such as the use of vegetated swales. "This is common practice and could easily be incorporated in the *Yosemite Valley Plan*," states this person.

One equestrian respondent questions the draft plan's assertion that the present location of the rental stable impacts riparian areas and water quality. This person writes that such an assertion

“should be supported by tests run by environmental biologists. Where are the test results?” Including this information in the *Final Yosemite Valley Plan/SEIS* would improve the document, according to this individual.

Finally, one person requests the restoration of Mirror Lake. “Restore Mirror Lake by removing the blockages” is this respondent’s brief request. The nature or size of the “blockages” is not elucidated in the citizen’s letter.

542. Public Concern: The *Yosemite Valley Plan* should consider the cumulative impacts of non-point source pollution from an increased human population in El Portal.

“The DVP does not consider the related and cumulative impacts of increasing human population in El Portal, leading to non-point pollution from parking lots, residential and working facilities, and vehicle deposits on road beds. This may adversely affect populations of aquatic insects, especially those that are sensitive to pollution, which may adversely affect bat, bird and fish populations.” (Conservation Organization, Yosemite, CA - #7883)

Response: Increased development in El Portal could carry the increased risk of non-point source pollution. The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS*, however, provides specific actions and mitigation measures that would limit such risk to a negligible level. Development within 150 feet of the river would be limited by the River Protection Overlay. Runoff from parking lots, roadways, and residential and working areas would be collected for treatment. Effluent from all new facilities in El Portal would be piped into the existing sewage treatment system. Facilities that carry an inherent risk of causing pollution (e.g., fueling facilities) would be designed to strictly limit the chance of spills, and provide adequate containment and treatment of potential spills. The largest benefit to water quality in El Portal under the *Final Yosemite Valley Plan/SEIS* action alternatives would be the removal of the commercial bulk fuel facility. This facility poses the greatest risk of both catastrophic spills and continual, low-level pollution from runoff into the river and adjacent wetlands, and seepage into groundwater.

In a cumulative context, the development in El Portal would also represent a net gain in protecting water quality and the organisms sensitive to any degradation of water quality. Under existing conditions, many facilities in Yosemite Valley remain in the floodplain, where inundation could cause substantial releases of pollutants. Parking areas in the Valley currently have largely uncontrolled runoff, and many roadways run through meadows where petroleum-tainted runoff can affect aquatic habitats, and spills could have a devastating effect. Under the Preferred Alternative in the *Final Yosemite Valley Plan/SEIS*, many of these threats would be reduced. The number of cars parking in Yosemite Valley would be reduced, and parking lots that would remain in the Valley, or would be established outside the Valley, would have strict standards for containment and treatment of water pollutants. Relocation of housing and work areas out of the floodplain and out of Yosemite Valley, where they could also be constructed to higher standards, would further reduce threats to water quality in the Merced River. Restoration of aquatic and riparian habitats would provide direct benefits to a wide range of organisms dependent upon these habitats.

631. Public Concern: The *Yosemite Valley Plan* should provide for storm water mitigation measures.

“The SEIS fails to consider the use of vegetated swales and similar storm water mitigation measures to reduce the impacts of non-point pollution sources such as parking lots. This is common practice and could easily be incorporated in the Yosemite Valley Plan.” (Individual, Union City, CA - #4404)

Response: A mitigation measure common to all of the *Final Yosemite Valley Plan/SEIS* action alternatives is the “integration of stormwater pollution controls into design, construction, and operation of new facilities, parking areas, and other paved surfaces that concentrate runoff.” Parking at Yosemite Village would include such stormwater pollution controls. The River Protection Overlay also protects



water quality by limiting development in the areas immediately adjacent to the Merced River and providing a “filter” between developed areas and the river.
(Also see response to Concern #757.)

606. Public Concern: The *Yosemite Valley Plan* should substantiate claims that the horse stables negatively impact riparian areas and water quality.

“Statements that the present location of rental stables impacts riparian areas and water quality of runoff should be supported by tests run by environmental biologists. Where are the test results?” (Individual, No Address - #3492)

Response: It is the goal of the *Yosemite Valley Plan* to preserve the natural processes and cultural heritage of Yosemite Valley while providing a wide range of high quality visitor experiences and opportunities. The long tradition of stock use and its importance to some users is recognized and much consideration has been given to providing opportunities for stock use. Conversely, other visitors have voiced concerns about conflicts with stock on trails and the effects of the presence of stock on the quality of their experience and on natural resources.

The current concessioner stable operation sits directly adjacent to Tenaya Creek, just upstream of its confluence with the Merced River. Lands immediately upstream and downstream of the stable have been identified as wetlands in site-specific surveys. Soils in these areas consist of hydric black sandy loam soils. Small pockets of vegetative cover are characterized by facultative wetland species, including white alder, and obligate wetlands species such as rushes and sedges. These characteristics, in conjunction with known flood frequencies through the stable area, indicate that the stable is situated on a site that could (and historically did) support riparian vegetation. Most of the stable area is denuded of vegetation, indicating a loss or impact to riparian communities (see *Final Yosemite Valley Plan/SEIS*, Vol. IA, Chapter 3, Affected Environment).

The stable also supports a large seasonal population of brown-headed cowbirds that frequent the site because of the high concentration of horse manure that supports the insects on which the cowbirds feed. Various wildlife studies indicate that impacts from nest parasitism by brown-headed cowbirds on bird species that nest in riparian habitats can have severe effects on these species (see Chapter 3, Affected Environment).

The geographic location of the stable directly adjacent to Tenaya Creek and only a few feet above it vertically means this site receives fairly frequent flooding, as well as frequent groundwater inundation of portions of the site during spring runoff. All fecal and urinary wastes on the ground and in the soils are flushed away through either sheetflow or near-surface water flows, carrying these wastes directly into the river system. Because of the lack of wetland and riparian vegetation between the stable and the river's edge, there is little or no ability for nutrient uptake to minimize these discharges into the river.

Such impacts to the riparian environment (soils, water, and vegetation), the highly valued resources, and the natural river processes support the proposed action to remove the stable from its current location.

610. Public Concern: The *Yosemite Valley Plan* should require the restoration of Mirror Lake.

“Restore Mirror Lake by removing the blockages.” (Individual, Reseda, CA - #4221)

Response: Mirror Lake has been manipulated in the past by sand dredging and construction of a rubble dam. Consistent with the 1980 *General Management Plan* goal to “allow natural processes to prevail,” Mirror Lake is no longer manipulated and the National Park Service has largely restored its natural fluvial processes. Further restoration at Mirror Lake is beyond the scope of the *Yosemite Valley Plan*.

757. Public Concern: The National Park Service should develop site designs for out-of-Valley parking that protect storm water quality.

“Alternatives 2,4, and 5 all include out-of-Valley parking. The SEIS identifies the number of parking spaces needed at each of the sites, but does not provide information on the size of the out-of-Valley parking sites or any specific site design features under consideration for these sites. EPA is concerned that the creation of conventional, impermeable “black-top” parking surfaces can lead to the concentration of polluted storm water runoff.” (Environmental Protection Agency, San Francisco, CA - #10295)

Response: Vol. IB, Chapter 4, Environmental Consequences, of the *Final Yosemite Valley Plan/SEIS* identifies the size (in acres) of each of the out-of-Valley parking facilities and discusses the associated impacts of this development. Specific site design features for the parking facilities are outside of the scope of the *Yosemite Valley Plan*; however, mitigation measures related to impacts from parking facilities are identified in Vol. IA, Chapter 2, Alternatives. These measures include:

Integrate storm water pollution controls into design, construction, and operation of new facilities, parking areas, and other paved surfaces that concentrate runoff.

Impacts on the site’s resources will be minimized and mitigated. The design for the impermeable areas and the associated runoff subsequent to hydrologic events would provide for appropriate drainage to ensure that natural resources are not further degraded.

Define parking area boundaries to confine damage from vehicles and trampling of meadows and other sensitive resource areas.

Design of parking would allow minimal resistance for flood waters, therefore minimizing impacts on the river, the road, and associated parking.



Section 4.3 ~ Wetlands

Protecting the natural resources of Yosemite Valley, including the Merced River and its associated wetlands and riparian areas, is an important priority for some *Draft Yosemite Valley Plan/SEIS* respondents. Of those respondents expressing concern over the future of the Valley's wetlands, one individual additionally requests that the Yosemite Valley planning team be more consistent and accurate with the definitions used to describe wetlands and riparian areas. Noting that the terms riparian and wetland are distinct concepts, this individual exhorts the National Park Service to use the Fish and Wildlife Service's definitions for riparian areas and wetlands. "Please stop interchanging riparian with wetland," requests this person. "It is patently false and extremely misleading to both those who understand the distinction and those that don't."

This section concludes with technical and editorial comments regarding wetland nomenclature used in Table 3.1 and throughout the text of the *Draft Yosemite Valley Plan/SEIS*. One technical comment included in this section questions whether actual dynamite was used to blast the El Capitan moraine in 1879. This reader suggests that less effective explosives were used, hence reducing the actual impact the event had on the Merced River's hydrology and the adjacent water table.

3. Public Concern: The *Yosemite Valley Plan* should emphasize the protection of the Merced River corridor.

"By all means do protect the river and river corridor. I hope my grandchildren will one day see a true riparian forest in the Valley." (Individual, Penngrove, CA - #95)

Response: The *Yosemite Valley Plan* emphasizes the protection of the Merced River corridor, particularly in Yosemite Valley. Allowing natural processes to prevail is a primary goal of the 1980 *General Management Plan* and has been an important factor in the development of the *Yosemite Valley Plan/SEIS* (see Vol. IA, Chapter 1, Purpose and Need). It is recognized that natural processes play a major role in maintaining a healthy ecosystem and the Valley's scenic beauty. Primary among these are the hydrologic processes. The Merced River and its tributaries provide a mosaic of habitats, including meadows, wetlands, and woodlands, that support wildlife and biological diversity. The Preferred Alternative would seek to restore substantially altered natural systems and protect unaltered systems.

The *Yosemite Valley Plan/SEIS* is consistent with the *Merced Wild and Scenic River Comprehensive Management Plan (Merced River Plan/FEIS)*. In 1987 Congress designated the Merced Wild and Scenic River, which is administered in separate segments by the National Park Service, the U.S. Forest Service, and the Bureau of Land Management. In 1999 and 2000, the National Park Service developed the *Merced River Plan/FEIS* for the sections of the Merced Wild and Scenic River that it administers. Included in the plan are descriptions of the seven management elements, including boundaries, the official classifications of river segments, the Outstandingly Remarkable Values (ORVs, such as hydrologic processes) associated with the Merced River, the Wild and Scenic Rivers Act Section 7 determination process, the River Protection Overlay, management zones and prescriptions, and the Visitor Experience and Resource Protection framework. Primarily a land-use zoning plan, the purpose of the *Merced River Plan/FEIS* is to protect and enhance the river's Outstandingly Remarkable Values for the benefit and enjoyment of present and future generations. The plan's management zone prescriptions and River Protection Overlay guide the *Yosemite Valley Plan* in the type of development and levels of use allowed within the Merced River corridor in Yosemite Valley, Wawona, and El Portal. Consistent with the *Merced River Plan/FEIS*, the intent of the *Yosemite Valley Plan/SEIS* is to protect and enhance the Merced River's Outstandingly Remarkable Values.

An important tool to protect the areas immediately adjacent to the river is the River Protection Overlay, which was established in the *Merced River Plan* and would be implemented in the *Yosemite Valley Plan*. This prescription encourages restoration in a buffer area adjacent to and within the river, and limits development to essential facilities.

The Merced Wild and Scenic River is described in Vol. IA, Chapter 3, Affected Environment. Impacts to the Merced Wild and Scenic River are described in Vol. IB, Chapter 4, Environmental Consequences. Graphics portraying the Merced Wild and Scenic River and the boundaries are found in Vol. IC, Plates. The Merced Wild and Scenic River classifications, Outstandingly Remarkable Values, Management Zones, and River Protection Overlay are described in Vol. II, Appendices.

493. Public Concern: The National Park Service should clarify the definition for “wetlands” in the *Yosemite Valley Plan*.

“You provide the classic F&WS Cowardin definition for wetlands in chapter 3 of Volume IA, but on page 2-8 of that same volume you provide this different, and extremely inaccurate, definition: ‘Wetlands: Wetlands are integral to the Merced River ecosystem and are usually found *adjacent to* (emphasis added) the river and its tributaries. Wetland communities include the river channel, riparian, and meadow communities. Wetlands are among the most biologically diverse natural communities. *Riparian wetlands*, (emphasis added) in particular, are some of the most productive of any natural community.’ The problems with this definition are myriad. (1). Wetlands and Riparian Areas are distinct ecological classifications, yet you create a new ecotone by coining the phrase ‘Riparian wetlands.’ (2). Wetlands are ‘usually found adjacent to the river’ but then the definition goes on to contradict this ‘wetland communities include the river channel . . .’ According to Hansen, ‘Permanent waters of streams and water deeper than 3m in lakes and reservoirs are not considered wetlands.’ (Hansen, et al 1995) Ergo, any stream or river shallower than 3m is a wetland in its entirety. (3). ‘Adjacent to the river’ is the phrase most likely to show up in your definition of riparian, which again, is a distinct ecological community from a wetland community (which, again, you use interchangeably in the second sentence of this definition). The National Park Service should exclusively use the Cowardin definition for wetlands to avoid confusion.” (Individual, Missoula, MT - #7257)

Response: The *Final Yosemite Valley Plan/SEIS* uses the Cowardin Wetland definition in conjunction with the National Park Service and U.S. Army Corps of Engineers’ definitions of wetlands. The text in Vol. IA, Chapter 3, Affected Environment, Wetlands, has been modified to clarify how the classification system was applied and how wetlands are defined by the National Park Service.

494. Public Concern: The National Park Service should clarify the term “riparian” in the *Yosemite Valley Plan*.

“Equally discombobulating [as the definition of wetland] is the use of the term ‘riparian’ throughout the documents. On page 7-9 of the executive summary you define ‘riparian’ as those areas that are on or adjacent to rivers and streams . . .’ This is practically verbatim to your definition for wetlands just cited. ‘‘Riparian’ and ‘wetland’ are not synonyms and usage varies greatly. We often use the terms in combination when speaking of general situations that include both.’ (Hansen, et al 1995) While resource managers may use the terms in combination, they do make the distinction and they do define them differently. Last year, when conducting the National Wetland Inventory for Zion National Park in Springdale, UT, I was not only charged with ground-truthing the park’s wetlands but also the riparian polygons. I used a draft document (that should be published as a final document by now) called ‘A System for Mapping Riparian Areas in the Western United States.’ (USFWS 1997) I would like to share the F&WS discussion of the concept and definition of ‘riparian’ with you: ‘Riparian is viewed from many perspectives. Older and more classical riparian interpretations identify primarily woody vegetation associated only with lotic systems. Recent interpretations include a broader view involving both lotic and lentic systems, surface and subsurface water influences, and natural forces and human-induced activities that affect the woody and emergent vegetation. Although riparian areas are closely associated with water and topographic relief, they are independent from either wetland or upland. Riparian areas lack the amount or duration of water usually present in wetlands, yet are ‘wetter’ than adjacent uplands.’ (USFWS 1997) ‘Riparian refers to areas of vegetation associated with perennial or intermittent lotic and lentic systems. The vegetation of these areas is recognizable as distinctly different species and/or growth forms compared to adjacent vegetation. Riparian vegetation is usually transitional between wetland



and upland. The vegetation is often found in river valleys, stream corridors, and other areas contiguous with, and affected by, the surface or subsurface hydrologic features of rivers, streams, drainage ways, and lakes.’ (USFWS 1997) The National Park Service should use the F&WS definition of riparian throughout their documents. Please stop interchanging riparian with wetland. It is patently false and extremely misleading to both those who understand the distinction and those that don’t.” (Individual, Missoula, MT - #7257)

Response: The term riparian can be defined a number of ways. For the purposes of the *Final Yosemite Valley Plan/SEIS* discussion on wetlands, riparian areas are considered to be a subset of wetlands and, therefore, their definitions will be similar. Similarly, meadow areas in the *Final Yosemite Valley Plan/SEIS* were also considered to be a subset of wetlands. Thus, the terms riparian wetland and meadow wetland refer to the subtype of wetland. The National Park Service agrees that these terms can be confusing; therefore, the text in Vol. IA, Chapter 3, Affected Environment, Wetlands, has been modified to clarify the discussion of different wetland types.

Section 4.4 ~ Geology, Geohazards, and Soils

“Yosemite Valley is an inherently risky place,” declares one person in response to the Geologic Hazards section of the *Draft Yosemite Valley Plan/SEIS*. Several other respondents agree while offering diverse suggestions on how the National Park Service should address potential safety hazards posed by rockfall and mitigation of impacts on geologic resources resulting from management decisions.

Accusing the National Park Service of ignoring potential geohazards within Yosemite Valley, one individual insists the *Yosemite Valley Plan* should require the removal of all public facilities that may be affected by catastrophic seismic activity. “These seismic hazards are good reasons, legal and otherwise, to provide the public with a planning alternative that will significantly clean buildings and other facilities out of Yosemite Valley,” this person contends. The California Governor’s Office of Planning and Research calls upon the National Park Service to expand analysis of potential hazards from rockfalls both outside and within Yosemite Valley.

Specifically, the state agency challenges a statement in the Executive Summary of the *Draft Yosemite Valley Plan/SEIS* that dismisses mitigation for rockfall hazards outside of the Valley. The agency contends that rockfall-caused road damage and closures on State Highway 140 over the past few decades is sufficient evidence to warrant further analysis of potential geohazards outside the Valley. The agency also notes the 1996 blow-down of trees at Happy Isles as justification for further investigation of potential rockfall-induced airblast hazards. While agreeing that public safety must receive priority consideration, a nongovernmental organization admonishes Park leadership to evaluate public facilities in hazard zones individually rather than collectively. “Not all structures in the floodplain or rockfall zones are equally at risk,” the organization argues and suggests historical significance should be factored into risk assessments.

The conservation of geologic resources within the Valley is also a topic of concern for those responding to the *Draft Yosemite Valley Plan/SEIS*. One individual believes the plan’s geologic analysis is insufficient because it fails to identify the soils of the El Portal section of the Merced River as an Outstandingly Remarkable Value (ORV) under the Wild and Scenic River Act. Increased human activity in El Portal, this individual warns, will impact the conservation of topsoil in the area and therefore necessitates recognition as an Outstandingly Remarkable Value.

674. Public Concern: The *Yosemite Valley Plan* should remove facilities and restrict public access from areas within rockfall and rockfall-induced air blast hazard zones.

“The NPS administrators and planners continue to ignore the serious hazards of rockfall and rockfall tree blow down in the Valley. Almost every year people have been killed in Yosemite Valley from these hazards. There is a fundamental flaw in the Yosemite safety planning. . . It appears little or nothing is being done to remove facilities in the more dangerous areas of the Valley for public safety. . . Under California law, if government officials ignore seismic hazards to the public, and in the event of an earthquake catastrophe, they may be held personally liable for damages. These seismic hazards are good reasons, legal and otherwise, to provide the public with a planning alternative that will significantly clean buildings and other facilities out of Yosemite Valley.” (Individual, Mountain View, CA - #6140)

Response: The Yosemite Valley Geologic Hazards Guidelines provided in Vol. II, Appendix C of the *Final Yosemite Valley Plan/SEIS* will be used to evaluate all new and existing facilities with respect to rockfall hazards within the Valley to reduce the exposure of the public and park staff to such hazards.



Geologic hazards have been a primary concern in the development of the alternatives in the *Final Yosemite Valley Plan/SEIS*. Discussion of this issue is presented in Vol. IA, Chapter 2 under Development Considerations; is included within each alternative under specific actions; is included in Vol. IA, Chapter 3, Affected Environment; and is addressed in Vol. IB, Chapter 4, Environmental Consequences. Geologic hazards are also represented graphically in Volume 1C.

452. Public Concern: The *Yosemite Valley Plan* should include an analysis of geologic hazards between Yosemite Valley and El Portal.

“On page 4-12 of the Executive Summary, the DEIS states that Out-of-Valley areas were not included in the analysis of geologic hazards because ‘the relative risk of rockfall in these areas would be negligible due to lack of evidence of past rockfall events.’ Wiczorek, et al., (1992) present abundant evidence of past rockfalls in the Merced Gorge and farther downstream to El Portal, which is outside Yosemite Valley. The rockfalls that have damaged (and closed) State Highway 140 during the past few decades are noteworthy. . . The effect of rockfalls on Highway 140 is crucial in planning what should stay in the Valley and what should be moved (or retained) elsewhere. Therefore, we recommend that the DEIS geologic hazard analysis be expanded to include the areas between the Valley and El Portal.” (Governor’s Office on Planning and Research, Sacramento, CA - #6584)

Response: With the exception of the Arch Rock Entrance Station, there are no permanent structures planned for the area between Yosemite Valley and El Portal. Also, traffic along the roadway in the area is considered transitory and not a permanent population. The transitory nature of the traffic allows little exposure at any one time to potential geologic hazards. For these reasons, this area was not included in the analysis of geologic hazards for Yosemite Valley.

450. Public Concern: The *Yosemite Valley Plan* should include an analysis of potential hazards from rockfall-induced air blasts in Yosemite Valley.

“We did not find mention of the hazards from air blast induced by rockfalls. This phenomenon could cause significant property damage and human injury in locations that have stands of tall, shallow-rooted trees. The blow-down of trees at Happy Isles by a rockfall in 1996 is an example of such a hazard. We recommend that the final EIS explore the potential for air blast hazards, using geographic information system (GIS) analysis to map where talus and rockfall shadow zones coincide with stands of forest, particularly shallow-rooted conifers.” (Governor’s Office of Planning and Research, Sacramento, CA - #6584)

Response: The National Park Service understands there may be potential danger from air blast during a rockfall event. However, the air blast effect is not common and there is very little scientific data on which to base an analysis. The National Park Service has consulted with the U.S. Geological Survey, and determined that until more research has been conducted, the potential hazard for this aspect of rockfall cannot be addressed at this time.

673. Public Concern: The National Park Service should weigh historical significance against geologic hazard risks when considering removal of structures within Yosemite National Park.

“We are concerned that perhaps too much emphasis and faith is being placed in the floodplain and rockfall maps. We recognize the threats posed by both of these natural forces, but also believe that assessing risk is not as simple as drawing a line across a map. Not all structures in the floodplain or rockfall zones are equally at risk, and there is a considerable margin of error in predicting these events. Nobody wants to play a numbers game where human safety is concerned, but Yosemite Valley is an inherently risky place, and marginally increased risk must be weighed against other factors, including historic significance. Where the predicted extent of rockfall zones and floodplains directly determines whether historic resources are preserved or destroyed, we believe that these determinations must be more closely assessed.” (Non-Governmental Organization, San Francisco, CA - #8925)

Response: Vol. II, Appendix C, Yosemite Valley Geologic Hazards Guidelines, in the *Final Yosemite Valley Plan/SEIS*, discusses the process of evaluating whether or not a historic structure would be removed from a geologic hazard zone. If the functions those structures support are in the categories of “essential” or “hazardous,” the structure may remain as long as the functions are relocated to safer areas and the structure is adapted for more appropriate uses.

675. Public Concern: The *Yosemite Valley Plan* should identify soils in the El Portal section of the Merced River as Outstanding Remarkable Values.

“Soils in the El Portal section of the WSR were not identified as an ORV. The soils in this area are very sensitive to erosion given that they are very dry and there is very little topsoil. Because the soils are so fragile they should have been designated as an ORV. Any construction or trampling from recreation will easily impact plants and debris that hold topsoil in place.” (Individual, El Portal, CA - #7026)

Response: This concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan*. The definition of Outstandingly Remarkable Values (ORVs) was revised in the *Merced Wild and Scenic Comprehensive Plan/FEIS* based on a clearer understanding of the Wild and Scenic Rivers Act. The *Final Yosemite Valley Plan/SEIS* would protect those Outstandingly Remarkable Values and is not revisiting their definition. Susceptibility to erosion by itself is not sufficient to qualify soils as an Outstandingly Remarkable Value.



Section 4.5 ~ Vegetation

Protecting and enhancing the vegetative components of impacted ecosystems in Yosemite Valley is a concern for many draft plan respondents. Citizens address a wide spectrum of loosely related topics that include the adequacy of analysis of vegetative impacts, the restoration of meadows, and the removal of trees in Yosemite Valley. Comments concerning the use of prescribed fire round out this section.

The adequacy of analysis regarding vegetative impacts is incomplete or needs clarification, according to some respondents. Potential inconsistencies regarding the identification of rare, threatened, and endangered floral species in Volume 1B of the *Draft Yosemite Valley Plan/SEIS* should be clarified, according to one person. The *Final Yosemite Valley Plan/SEIS* should address the cumulative impacts on vegetation from increased human populations in El Portal, according to several individuals. Similarly, one conservation organization believes that the *Final Yosemite Valley Plan/SEIS* should acknowledge the potential impacts increased automobile traffic in El Portal may have on roadside vegetation.

The impact of humans on Yosemite Valley's meadows is manifest and should be addressed in the *Yosemite Valley Plan*, according to many people. Several respondents believe that the National Park Service should restore sensitive habitats—in particular meadow, black oak, and riparian areas. In addition, one individual feels that the restoration of meadows could be accomplished by constructing terraces in the Merced River east of the terminal moraine.

In addition to the proponents of meadow protection, many respondents support the preservation of the Valley's trees. One public hearing attendee pleads, "Don't remove the trees, please. I think that they deserve to continue living. Maybe they are in the wrong place, but it's not their fault." Another constituent opposes the removal of the "beautiful tall pine trees which give the Valley so much of its present day character." Responding to a tangentially related topic, one respondent believes that the *Yosemite Valley Plan* should require low-impact management techniques, such as removing structures and planting vegetation, for the restoration of closed campgrounds. Any removal of trees in these campgrounds "could deface these sites for generations," according to this individual.

Not all respondents believe that the restoration of Yosemite Valley vegetation and habitat is of paramount concern. "Is it that essential that we recover the former oak population at great expense and restriction of humans?" one person inquires. Others suggest that stock grazing be allowed in the meadows of Yosemite Valley. "Meadows should not be closed due to unsubstantiated claims of over-grazing or because of excessive use by another user group," asserts a representative of a recreational organization.

The use of fire is another vegetative management tool that elicits several comments. While some believe the National Park Service should utilize carefully managed prescribed fire to improve habitat conditions, others feel that the National Park Service should eliminate all controlled burning in Yosemite National Park. The National Park Service should consider mechanical treatments to enhance Yosemite National Park vegetation, according to another, "where fire cannot by itself sufficiently enhance the park's pine/oak forest/meadows mixture."

633. Public Concern: The National Park Service should address potential inconsistencies regarding identification of rare, threatened, and endangered floral species in Volume 1B of the Draft *Yosemite Valley Plan/SEIS*.

“There appears to be a major error in the conclusions concerning vegetation in Volume 1B Environmental Consequences. On page 4.2-41, the Conclusion paragraph states: ‘There are no known federal or state listed plant species that occur within the Valley or potentially affected out-of-valley areas . . . with only four that are state special concern and three that are federal species of concern.’ This was also repeated on page 4.2-42 second column, third paragraph. This appears to be contradicted by page 4.2-40 in the El Portal paragraph which says, ‘There are currently one federal plant species of concern (Congdon’s lomatium), four state listed rare species, (Yosemite Onion, Tompkin’s sedge, Congdon’s Woolly Sunflower, and Congdon’s Lewisia) . . . that occur within the general El Portal area. Radiating impacts from trampling would continue to occur to all of these species, except Yosemite Onion and Congdon’s lomatium . . . and would be increased . . . potential impacts would occur to Tompkin’s sedge . . . from development of out-of-valley parking and employee parking.’ It goes on to say that they would salvage and replant Tompkin’s sedge resulting in minor adverse impacts. It also mentions continuing adverse impacts with roadside maintenance to Tompkin’s sedge, Congdon’s woolly sunflower and Congdon’s Lewisia. This contradiction is repeated under the conclusions concerning vegetation for all the rest of the alternatives 3 through 5 in addition to alternative 2. See pages 4.3-20 under Conclusion, 4.4-21 Conclusion and 4.5-21 under Conclusion.” (Individual, Columbia, CA - #7149)

Response: These errors have been corrected in the *Final Yosemite Valley Plan/SEIS*, as well as in the Biological Assessment for the *Final Yosemite Valley Plan/SEIS*. The magnitude of impact to rare, threatened, and endangered plant species in El Portal has been changed to moderately adverse, and the text has been corrected.

543. Public Concern: The *Yosemite Valley Plan* should address the cumulative impacts on vegetation from increased human populations in El Portal.

“The DVP does not consider the related and cumulative impacts of increasing human population in El Portal, leading to trampling of vegetation (which means increased soil erosion, fragmentation of habitats, soil disturbance and invasion of exotic plants, and population decline of ecologically sensitive species that are not necessarily species listed as sensitive).” (Conservation Organization, Yosemite, CA - #7883)

“In El Portal, the human population will at least double from 600 residents to over 1200 residents plus 370 tourist automobiles which could add another 400 to 800 people impacting a limited area that had very limited impacts before. It also says that impacts would be limited due to implementation of site-specific mitigation measures. These are undefined. In addition, mitigation usually means trying to limit human activities, or relocating T & E species. . . El Portal is a narrow canyon with poison oak and steep hillsides naturally limiting the human population to the riparian corridor, upland benches and roads for recreation. Additionally, non-native plant populations are already reaching crisis sizes with the Park Service doing relatively little to impact their populations. Development equals a net loss of habitat and fragmentation of ecosystem processes. Innumerable variables work in concert to create habitats for species. Restoration should not be used as a justification for development and disturbing habitat as we know that ecosystems are very complex and very difficult, if not impossible, to restore.” (Individual, El Portal, CA - #7026)

Response: The existing environment in El Portal, including impacts to vegetation by the current level of use, is described in Vol. IA, Chapter 3, Affected Environment. Existing impacts specific to rare, threatened, and endangered species in El Portal are also discussed in Vol. IB, Chapter 4, Environmental Consequences. Cumulative impacts to vegetation and rare, threatened, and endangered species caused by the proposed increased El Portal population have been addressed in all alternatives.

544. Public Concern: The *Yosemite Valley Plan* should address potential negative impacts on roadside vegetation from increased automobile traffic in El Portal.

“The DVP does not consider the related and cumulative impacts of increasing human population in El Portal, leading to particulate deposits from exhaust on roadside vegetation will decrease plant productivity as well as enter



pollutants into the food chain and the aquatic ecosystem as a non-point source of pollution.” (Conservation Organization, Yosemite, CA - #7883)

Response: The *Final Yosemite Valley Plan/SEIS* considers potential impacts to vegetation in El Portal (see Vol. IB, Chapter 4, Environmental Consequences), and also evaluates potential impacts to air and water quality. The effects of non-point source runoff have been included in Vol. IA, Chapter 3, Affected Environment. Ongoing studies in Yosemite National Park and in the Sierra Nevada are examining the effects of external and internal air pollutants on natural resources, including vegetation. The National Park Service participates with the California Air Resources Board in monitoring air quality conditions within the park relative to regional standards.

392. Public Concern: The *Yosemite Valley Plan* should provide for the restoration of sensitive habitats.

“I support removing roads and utilities to restore sensitive meadow areas, as well as restoring any other sensitive types of habitat by removing structures and limiting access. I am a big fan of restoring areas to healthy and natural conditions. I feel that wherever possible, removing structures and restoring the area should be done. I am also a big fan of continuing to monitor areas after they have been restored. All restoration areas should have some kind of monitoring and evaluation schedule set up, as well as continued maintenance until the area has fully recovered.” (Individual, Columbia, CA - #4235)

“There is too much emphasis in the various alternatives in the draft plan on moving facilities from one place to another and on constructing new facilities in places unimpacted in the past. Emphasis should be placed on restoration under a clearly articulated set of priorities.” (Conservation Organization, Fresno, CA - #7881)

Response: As stated in the *Final Yosemite Valley Plan/SEIS*, the two primary purposes of Yosemite National Park, are to preserve the resources that contribute to the park’s splendor and uniqueness, and make the varied resources of Yosemite National Park available to people for their enjoyment, education, and recreation, now and in the future (Vol. IA, Chapter 1, Purpose and Need). All alternatives presented in the *Final Yosemite Valley Plan/SEIS* seek to achieve an appropriate balance between visitor use and enjoyment and protection and preservation of the cultural and natural resources that make up Yosemite National Park. The focus of the *Yosemite Valley Plan* is on protecting and restoring an ecological system that is sustainable over time within the framework of visitor use and long-term management, and an emphasis has been placed on defragmenting critical habitats and providing for river protection and the restoration and function of natural processes.

The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* has identified meadows, riparian areas, and California black oak woodlands as highly valued resources that will receive the highest priority for protection and restoration. All restoration actions are intended to meet the goals of the *General Management Plan*, but specific objectives vary from site to site depending on site characteristics. Some site restoration objectives are also guided by cultural landscape and ethnographic resource issues. The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* also calls for the restoration of natural water flow patterns through the removal or modification of roads, paved paths, and parking lots. This would also lead to altered soil moisture with associated shifts in vegetation. The National Park Service would also continue to control non-native plant species, and place an emphasis on defragmenting vegetation through the center of Yosemite Valley to improve ecosystem function. This would include linkages of wetlands and riparian areas to current and potential meadow sites. These treatments are proposed to varying degrees in each of the action alternatives, with consequences outlined in Vol. IB, Chapter 4, Environmental Consequences of the *Final Yosemite Valley Plan/SEIS*.

233. Public Concern: The *Yosemite Valley Plan* should protect meadow, black oak, and riparian areas from pedestrian traffic.

“Some areas, which are in need of protection, are the meadow areas, the California black oak communities, and the riparian habitats. We respect that the protection of these areas is not always compatible with the goals of tourism in the area, however, with significant interpretive and educational services to visitors to the Park, the long-term protection may be achieved. Immediate preservation actions that may be taken could be the construction of raised wooden paths in certain areas of the meadow and California black oak habitats, along with construction of paths through a limited area of the riparian habitat. We believe that the only way that visitors will respect the ecological significance of the area is through educational programs that highlight the fragile nature of such communities.” (Individual, San Luis Obispo, CA - #1510)

Response: The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* has identified meadows, riparian areas, and California black oak woodlands as highly valued resources that would receive the highest priority for protection and restoration. In areas where continuing or new development impacts are unavoidable, the *Final Yosemite Valley Plan/SEIS* has identified a series of mitigations that would help minimize short-term impacts as well as impacts over the long term (see Chapter 2, Alternatives). These mitigations include site-specific planning to avoid direct impacts to long-lived species such as black oak trees, as well as fencing, installation of educational signs and construction of boardwalks, and delineation of pathways to allow people to move through these areas while minimizing their impacts. Other not-so-visible impacts such as encroachment of meadows by non-native species would continue to be managed by vegetation management staff in conjunction with fire management and other National Park Service programs involved in the protection and long-term management of the park's vegetative resources.

The River Protection Overlay in the *Merced River Plan/FEIS* provides for the protection of resources that connect to the Merced River system, which include most meadow and riparian resources in Yosemite Valley. The width of the River Protection Overlay is 150 feet above 3,800 feet elevation and 100 feet below, measured from ordinary highwater. That width is based on the area needed to encompass enough riparian and adjacent upland vegetation and habitat and to allow for a large enough area for natural processes to prevail — one of the five primary goals of the 1980 *General Management Plan*. Implementation of the River Protection Overlay would result in long-term benefits to the river system and to the vegetation communities that are linked to it.

336. Public Concern: The National Park Service should restore meadows by constructing terraces in the Merced River east of the terminal moraine.

“There are some good options for the park that are not considered in any of the plans. . . A system of terraces in the river east of the terminal moraine ridge to increase the groundwater level in order to restore meadows.” (Individual, Coulterville, CA - #3724)

Response: One of the goals of the 1980 *General Management Plan* is to “allow natural processes to prevail.” When natural processes have been impaired by human influences and are not functioning properly, the National Park Service intervenes to restore the natural processes and mimic their influence, as well as restore the resources that have been damaged or lost due to the interruption of natural processes. As an example, the altered water regime in meadows has resulted in the encroachment of conifers into the meadows, and the National Park Service regularly burns the meadows in order to control the encroachment. However, restoration programs that mimic the influence of a natural process are imperfect, and care must be taken to avoid impacts to other natural processes or natural and cultural resources.

Constructing terraces in the Merced River east of the terminal moraine would impede river flow and not allow natural river processes to prevail. In addition, constructing terraces in the Merced River to impede river flow would not comply with the guidance and direction provided in the *Merced River Plan/FEIS* associated with not impeding natural river flow.



462. Public Concern: The *Yosemite Valley Plan* should prohibit the removal of any trees in Yosemite Valley.

“Don’t remove the trees, please. I think that they deserve to continue living. Maybe they are in the wrong place, but it’s not their fault.” (Public Hearing, San Jose, CA - #20520)

Response: Active removal of trees may occur during *Yosemite Valley Plan*-related restoration and redevelopment actions, particularly where dying trees pose a hazard to the public, to workers, or to structures and utilities in the area, similar to the hazard tree program currently in place in Yosemite National Park. Also, planted giant sequoias in Yosemite Valley may be removed in areas that are being restored to highly valued resource vegetation types. Sequoias are not native to the Valley, and these trees have reached reproductive age and could potentially spread beyond the individual planted (historic) trees. Fruit trees at the Curry Orchard would be removed due to their impact to wildlife species in the area.

The *Merced River Plan/FEIS* calls for the implementation of a River Protection Overlay to allow natural processes to prevail (one of the goals of the 1980 *General Management Plan*), which would allow for ecological restoration of large portions of the east end of Yosemite Valley. This restoration and the preservation of cultural landscapes in Yosemite Valley would lessen the chances of survival over time of certain tree species in portions of Yosemite Valley.

For example, restoration of original riparian and cut-off channels would lead to larger areas of saturated soils. As soils become water-saturated for longer periods of time, water-intolerant trees such as ponderosa pines and incense-cedars would have increased rates of mortality. Some Valley landscapes have not been burned for a long time, resulting in the establishment of unnaturally high densities of trees (Vol. IA, Chapter 3, Affected Environment); during restoration, prescribed burns would be introduced into these areas and would cause high levels of tree mortality. As these and other natural processes are restored, impacts to trees, particularly conifers, would occur over time, leading to a more open landscape more characteristic of the scene first encountered by Euro-American explorers in Yosemite Valley in the 1850s.

669. Public Concern: The *Yosemite Valley Plan* should require the retention of tall pine trees in Yosemite Valley.

“[I oppose] restoring vegetation in such a way as to eventually eliminate the beautiful tall pine trees which give the Valley so much of its present day character. Doing this in the name of some distorted view of what the place looked like 100 years ago bears no relevance to what is most enjoyable for visitors of today. I still recall my first impression of Yosemite Valley. On my first visit, I was overwhelmed by the enormous (especially for me as non-Californian) pine trees that fit so well with the larger-than-life magnificent views of cliffs, and monoliths and water coming down everywhere.” (Individual, Los Altos, CA - #3165)

Response: The *Merced River Plan/FEIS* calls for the implementation of a River Protection Overlay to allow natural processes to prevail (one of the goals of the *General Management Plan*), which will allow for ecological restoration of large portions of the east end of Yosemite Valley. The *Final Yosemite Valley Plan/SEIS* would implement the guidance and direction of the *Merced River Plan/FEIS*, which could result in the removal of trees in areas that are unnaturally forested. In addition, preservation and restoration of the cultural landscapes integral to the natural and cultural resources of Yosemite Valley will lessen the chances of the survival of certain tree species in portions of Yosemite Valley over time.

For example, restoration of original riparian and cut-off channels will lead to larger areas of saturated soils. As soils become water-saturated for longer periods of time, water-intolerant trees such as ponderosa pines and incense-cedars will have increased rates of mortality. Some Valley landscapes have not been burned for a long time, resulting in the establishment of unnaturally high densities of trees (See Vol. IA, Chapter 3, Affected Environment); during restoration, prescribed burns would be introduced into these areas and would cause high levels of tree mortality.

As these and other natural processes are restored, impacts to trees, particularly conifers, would occur over time, leading to an open landscape more characteristic of the scene first encountered by Euro-American explorers in the Yosemite Valley during the 1850s. Active removal of trees may occur during restoration and redevelopment actions, particularly where dying trees pose a hazard to restoration workers or to structures and utilities in the area (similar to the hazard tree program currently in place in Yosemite). Giant sequoias planted in Yosemite Valley may be removed in areas that are being restored to highly valued resource vegetation types. Sequoias in the Valley are not natural, and these trees have reached reproductive age and could potentially spread beyond the individual planted (historic) trees. Fruit trees at the Curry Orchard would be removed due to their impact to wildlife species in the area.

670. Public Concern: The *Yosemite Valley Plan* should require low-impact management techniques for restoration of closed campgrounds.

"I urge you to limit restoration of closed campgrounds to removing structures, pavement and subgrade, and possibly some underground utilities; then loosening soil and planting, where necessary. I see no merit in removing imported fill to restore the topography of the closed campgrounds. It would add to the cost of restoration - and likely postpone its start. It would add pollution and traffic of its own. It would destroy existing vegetation, particularly in Camp 9 and Lower River, where revegetation is already well underway. By removing trees, it could deface these sites for generations." (Individual, Oakland, CA - #3835)

Response: All restoration actions called for in the *Final Yosemite Valley Plan/SEIS* are intended to meet the goals of the *General Management Plan*, but specific objectives vary from site to site depending on site characteristics. Some site restoration objectives are also guided by cultural landscape and ethnographic resource issues. Ecological restoration techniques in Yosemite National Park, as in many other national parks, incorporate a variety of low- and high-impact techniques to accomplish restoration goals. For example, watershed rehabilitation work at Redwood National and State Parks relies almost exclusively on heavy equipment to restore topography and thus drainage systems, topsoil location, and, eventually, vegetation as well. For recent removal of concession facilities and restoration of Giant Forest in Sequoia National Park, heavy equipment was used to restore topography and site characteristics most advantageous to the re-establishment of ecosystem function over time. These methods have also been used successfully in Yosemite National Park for over a decade in such areas as Cook's Meadow (removal of an old road bed and restoration of wetlands, 1996 to present), Housekeeping Camp (removal of riprap and re-establishment of riparian vegetation, 1996-1998), and the Schoolyard oak woodland (1987-1992). Low-impact work generally involves the final aspects of restoration of a site, including seed collection, planting, and application of materials to promote better soil and nutrient conditions (such as duff, forest litter, and, occasionally, soil amendments).

These design-level details for specific elements of the action alternatives are not fully developed in the document. This is because additional planning and analysis would be necessary before these projects can be implemented. Over a decade of restoration work in Yosemite National Park has given the National Park Service information on the techniques that are most appropriate for restoring various portions of the park's many ecological units, including meadow, wetland, riparian, California black oak woodland, and upland areas in Yosemite Valley.

230. Public Concern: The National Park Service should reassess the *Yosemite Valley Plan's* requirement for the restoration of oak populations in Yosemite Valley.

"As for the benefits from the oak population, here too we should take whatever steps are feasible to reverse their disadvantageous decline. However, the photos don't make this need clear nor is it obvious that human activities have caused the decline. Could other natural events beside gradual human build-up over the century have caused the depopulation? . . . And is it that essential that we recover the former oak population at great expense and restriction of humans?" (Individual, Sanger, CA - #2293)



Response: Yosemite Valley's oak trees are recognized as critical contributors to the Valley's natural ecosystem as well as to the cultural landscape. The decline of this vegetation type has been recorded over the years through such studies as Gibbons and Heady (1964) and Heady and Zinke (1978). According to the latter report, "The openness of the forest and the dominance by the two species [California black oak and ponderosa pine] probably resulted from periodic fires and the efforts of Indians to maintain orchards of California black oak for acorns. Both these factors have been greatly reduced for over 100 years." Other actions that have further reduced stands of black oaks include development of housing, roads, and visitor and administrative areas. These actions and activities have also deterred black oaks from reproducing, both because of heavy use levels and/or pavement in developed zones, and competition by native and non-native plants in areas no longer maintained by fire. Oaks in other areas of the Valley that do not receive these stresses are reproducing at natural rates, resulting in variably aged stands of seedlings, saplings, and overstory trees in distinctive age classes. In developed or impacted stands, all oaks are mature trees, with no seedlings and saplings to replace mature trees as they die.

Because of their significance as both cultural and natural resources, the National Park Service has focused on protecting existing stands of oaks, restoring impacted stands, and avoiding impacts to these long-lived trees in areas with development. In the *Final Yosemite Valley Plan/SEIS*, the California black oaks are also one of the highly valued resource vegetation types (see Vol. IA, Chapter 2, Alternatives), and have been used (in conjunction with the other highly valued resources) to guide land-use planning decisions during the development of alternatives. All of the action alternatives in the *Final Yosemite Valley Plan/SEIS* call for restoration of California black oak stands with removal of the Ahwahnee tennis courts and relocation of the Superintendent's House (Residence #1).

287. Public Concern: The *Yosemite Valley Plan* should allow grazing in meadows in Yosemite National Park.

"Meadows should not be closed due to unsubstantiated claims of over-grazing or because of excessive use by another user group. Actions limiting use of any grazing area should be after a monitoring program acceptable to both users and administrators indicates a need for action, and after review by experts in range management. Responsible cattle grazing, where allowed by agency regulation, is an acceptable component of the 'Multiple Use' concept and should be tolerated by all users as trails are not closed to other user groups." (Recreational Organization, No Address - #3701)

"Grazing of meadows by work animals should be implemented to help keep them open and promote healthy stands of perennial grasses. Hay transportation and feeding should be controlled, with only weed-free certified hay, covered when transported, and with feeding locations controlled to help prevent the spread of noxious weeds." (Individual, Sutter Creek, CA - #7305)

Response: This concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan*. Grazing in low-elevation meadows in Yosemite National Park does not meet the goals of the 1980 *General Management Plan* nor of the 1916 National Park Service Organic Act, which seeks to preserve resources while providing for the enjoyment of future generations. In general, grazing is not authorized within Yosemite National Park. Grazing does not facilitate the restoration of ecological systems or create or enhance habitat for the diversity of aquatic, plant, and wildlife species the National Park Service is mandated to protect and preserve.

In Yosemite Valley, grazing activities were eliminated in 1924 because of the damage to scenic and meadow conditions. Impacts to Yosemite's meadows from grazing were noted as early as the 1880's in the annual Commissioner's Reports. The 1885-1886 report states in part: "The truth is that, under the strain of over-pasture, the best meadow lands are being injured, while all of them show thickets of young pines, willows, and cottonwoods, and some of them are so entirely overgrown as to have passed out of pasture classification into that of a woodland." According to Gibbons and Heady (1964), "Heavy grazing allows seedlings to become established by reducing competition from sedges, grasses, and broad-leaved plants. Trampling creates drier conditions by compacting the soil and, in wet areas, by forming a rough, ridged

surface which increases evaporation and drying. Exposure of mineral soil provides an excellent seedbed...which favors tree seedling establishment". Justification for the elimination of grazing in Yosemite Valley remains as valid today as it was over 100 years ago.

Grazing of saddle and pack stock is allowed under careful management in some areas of the Yosemite Wilderness. No actions in the *Yosemite Valley Plan* would affect current grazing activities or management within wilderness, which is outside the scope this plan.

409. Public Concern: The National Park Service should utilize carefully managed prescribed fire to improve habitat conditions.

"I feel that prescribed fire can and must be performed in an ever more sophisticated manner to avoid partial results and disasters as have occurred elsewhere in recent times. With that in mind, fire managers and resource managers must cooperate ever more closely to promote habitats that approach presettlement conditions." (Individual, Walnut Creek, CA - #3565)

Response: This concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan*. Yosemite National Park has developed a prescribed burning program that manages vegetation and improves habitat conditions for many species. It has long been recognized that fire is an integral part of the forces that have created Yosemite's natural and cultural landscape, and these activities, as described in Vol. IA, Chapter 3, Affected Environment, and Vol. IB, Chapter 4, Alternative 2, would continue as proposed in the *Final Yosemite Valley Plan/SEIS*. Specific prescriptions for environmental conditions must meet the specific objectives of each prescribed fire, including safety and minimization of smoke and visitor disturbance. Site-specific restoration and habitat management goals are covered in various portions of the 1990 *Fire Management Plan*, the 1993 *Resources Management Plan*, and the 1997 *Vegetation Management Plan*.

261. Public Concern: The National Park Service should eliminate controlled burning in Yosemite National Park.

"Please end all 'controlled burning' within this (and all) Park systems. Allow private (and supervised) clearing and utilization of wood resources." (Individual, Planada, CA - #20513)

Response: This concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan*. However, prescribed fire is a valid resource management and fuel reduction method and will continue under the directions set forth in the 1990 *Fire Management Plan*.

410. Public Concern: The National Park Service should consider mechanical treatments to enhance Yosemite National Park vegetation.

"Where fire cannot by itself sufficiently enhance the Park's pine/oak forest/meadows mixture, then some mechanical removal of the Valley's pine overstory along the lines of a natural landscape design should be promoted." (Individual, Walnut Creek, CA - #3565)

Response: This concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan*. Yosemite National Park currently uses mechanical treatments in areas of the park where the use of fire is infeasible, such as around structures and in areas with high levels of human use where smoke conditions could pose serious health risks and/or where ground fuels have been so depleted that fires would not achieve vegetation management objectives. These actions are meant to either take the place of fire as a natural process or to aid in the reintroduction of fire at some future date. Site-specific prescriptions are developed for these mechanical removal projects, similar to prescriptions followed during prescribed burns. These activities as described in Vol. 1A, Chapter 3, Affected Environment, and in Vol. 1B, Chapter 4, Environmental Consequences) would continue as proposed in the *Final Yosemite Valley Plan/SEIS*. Site-specific restoration and habitat management goals are covered in various portions of the 1990 *Fire Management Plan*, 1993 *Resources Management Plan*, and 1997 *Vegetation Management Plan*.



Section 4.6 ~ Wildlife

This section contains disparate concerns regarding the preservation of Yosemite Valley's plant and animal species. Comments regarding wildlife impacts resulting from projects in Wawona and El Portal begin this section. Public concerns involving impacts on wildlife and fisheries from bridge removal and road building follow. This section concludes with suggestions to protect the great grey owl and a request to remove wildlife from Yosemite Valley.

One civic organization believes that the *Final Yosemite Valley Plan/SEIS* should address potential Wawona housing project impacts on wild species. This group believes the *Draft Yosemite Valley Plan/SEIS* "fails to address the housing project's potential adverse impacts on plant and wildlife species protected under state and federal law." The *Final Yosemite Valley Plan/SEIS* should not only identify the presence of special status species at the proposed housing site in Wawona, but it should also contain detailed plans to mitigate any adverse impacts this development may have on those species, according to one organization. Taking this concept one step further, a conservation organization exhorts the National Park Service (NPS) to evaluate the cumulative impacts of an increased human population in El Portal on wildlife.

In addition to the potential impacts of the Wawona and El Portal projects, many proponents of wildlife preservation believe the *Final Yosemite Valley Plan/SEIS* should address the impacts of bridge removal on wildlife. Some respondents feel such an action will disturb the animals' movement patterns. "I have personally observed deer and other wildlife utilizing the existing historic bridges to cross the Merced River," remarks one business representative. "Therefore, elimination of the bridges may also result in significant adverse impacts to the movement of wildlife and result in more wildlife being injured as attempts are made to cross the few remaining auto and bus bridges that cross the Merced River. This impact was not addressed or analyzed in the SEIS."

Although replacing bridges may improve the health of the Merced River's fisheries, another respondent notes the lack of analysis in the *Draft Yosemite Valley Plan/SEIS* regarding the deleterious effects of asphalt on fish. "The toxicity of oil pollution to aquatic populations has been seriously underestimated," according to this person. An aficionado of fishing believes that the National Park Service should establish an intensive trout management program for the Merced River. "In my judgment, there is no excuse for the disappearance of the trout from the Merced River in the Valley," according to this individual. "Under the present situation, the Merced River running through the Valley is simply being wasted as a marvelous family fishing resource and opportunity."

While numerous respondents comment on impacts to wildlife in general, some individuals cite species-specific examples. One such individual feels that the *Final Yosemite Valley Plan/SEIS* should account for any potential effects the proposed traffic increase on the Old Coulterville Road may have on great grey owls. Another grey owl supporter questions the logic behind locating the National Park Service stable at McCauley Ranch. "An NPS stable at South Landing would probably be better for the great gray owl population than one at Foresta because of less proximity to a large meadow," according to this individual.

Although most respondents who cite wildlife in their responses to the *Draft Yosemite Valley Plan/SEIS* exhort wildlife protection, one individual believes the Yosemite Valley Plan should require an aggressive management plan to remove bear and deer populations from Yosemite

Valley. This individual protests, “Bear and deer have no place in Yosemite Valley! They cannot be educated to conserve and preserve anything. There are plenty of places where they can and should be protected and allowed to roam, but not there.” Removing deer and bear populations from the Valley will improve vegetation, traffic flow, and ultimately, the visitor experience, according to this individual.

458. Public Concern: The *Yosemite Valley Plan* should address housing project impacts on plant and wildlife species.

“The Valley Plan’s SEIS likewise fails to address the housing project’s potential adverse impacts on plant and wildlife species protected under state and federal law. Although the Park Service’s Biological Assessment for the Valley Plan SEIS prepared last April identifies numerous plant and animal species that may be present in the Wawona area, and might be adversely impacted by the housing project, neither this Biological Assessment, nor the Valley Plan SEIS, includes or otherwise provides documentation of the site-specific surveys and studies necessary to ascertain the presence of such species (and the housing project’s potential impacts thereon).” (Civic Organization, Wawona, CA - #7549)

Response: The *Final Yosemite Valley Plan/SEIS* addresses housing development impacts to plant and wildlife species, as well as other development and redevelopment impacts under the Vegetation, Wildlife, and Rare, Threatened, and Endangered Species sections in the *Final Yosemite Valley Plan/SEIS* (Chapter 4, Environmental Consequences). Methods used to evaluate potential effects of housing and other developments on these species are included in Vol. IB, Chapter 4. Impacts to vegetation and wildlife species documented in projects outside of Yosemite National Park, but in similar environments, were used to develop the impacts sections of the *Final Yosemite Valley Plan/SEIS*. Where available, site-specific surveys within these areas were also used to help evaluate impacts. Knowledge of specific species sensitivities were used to develop the mitigation guidelines (Vol. IA, Chapter 2) that would be used during any construction action, including avoidance, timing to avoid critical reproduction periods, site protection, and salvage and replanting and/or reintroduction. Additional compliance may be necessary during the design phase of any new development or redevelopment project.

466. Public Concern: The *Yosemite Valley Plan* should identify the presence of special status species at the proposed housing site in Wawona and detail plans to mitigate adverse impacts.

“The Biological Assessment discloses that the following special status species ‘have been found or could occur in Wawona:’ Cooper’s hawk, sharp-shinned hawk, long-eared owl, yellow warbler, willow flycatcher, golden eagle, peregrine falcon, bald eagle, harlequin duck, great grey owl, California spotted owl, special-status bats [listed elsewhere], western pond turtle, California red-legged frog, footless yellow-legged frog, mountain yellow-legged frog, Yosemite onion, snapdragon, Sierra sweet bay, Bolander’s skullcap, and giant sequoia. Neither the MRP FEIS nor the Valley Plan SEIS discloses whether any of these species are present at the site of the proposed housing project, nor addresses whether any of these species might be adversely impacted by this project. Nor do any of these documents explain what measures, if any, have been undertaken to ascertain whether any of these species are present or might otherwise be impacted by the housing project. This is a critical omission, since detailed survey protocols for many of these species require repeated surveys over several seasons, or even years, before sufficient data is developed to permit an informed evaluation of the possible presence of these species, and the potential impacts thereon of a proposed project.” (Civic Organization, Wawona, CA - #7549)

Response: Although the list of rare, threatened, and endangered species that occur in Wawona is lengthy, only a portion of these species is expected to occur in the forested areas that could be developed under Alternatives 2 and 5 of the *Final Yosemite Valley Plan/SEIS*. While specific surveys for many special-status species are lacking, evaluation of potential impacts in this document assumes that if suitable habitat for a species occurs in an area, then the species is considered to be present. This conservative approach ensures that adequate consideration is given to rare, threatened, and endangered species. Such an analysis



was conducted for Wawona; however, it was not clearly reflected in the *Draft Yosemite Valley Plan/SEIS*. This problem has been corrected in the *Final Yosemite Valley Plan/SEIS*. In addition, surveys for California spotted owls in Wawona and other areas of potential development in the park have been recently completed. Results of these surveys are included in the *Final Yosemite Valley Plan/SEIS*.

Most of the detailed evaluations of special status species would occur on a site-specific basis prior to implementation of the *Final Yosemite Valley Plan/SEIS*. This would provide the most up-to-date information on these species, allowing project planning that would minimize adverse effects on individual species. For example, although recent surveys revealed no California spotted owls in the proposed project area in Wawona, the area would need to be surveyed again before construction could begin, in case spotted owls had moved into that area in the meantime. Surveys for special status species would become an integral part of site planning and implementation of the *Final Yosemite Valley Plan/SEIS*.

545. Public Concern: The *Yosemite Valley Plan* should evaluate the cumulative impacts of increased human population in El Portal on wildlife.

“The DVP does not consider the related and cumulative impacts of increasing human population in El Portal, leading to impediment of wildlife from the riparian corridor on the north side of the river. Please note that the statement from the Draft VP ‘Expanses of north-facing habitat allow[s] unlimited access to the riparian zone for wildlife species’ is misleading. The expanses mentioned only allow access to individuals on that side of the river. Individuals on the development side will be further impeded and therefore impacted.” (Conservation Organization, Yosemite, CA - #7883)

Response: A majority of development proposed for El Portal under the Preferred Alternative would occur in areas affected by existing development already, or areas with a history of disturbance. The existing dense development on the north side of the river (from the park boundary to El Portal Road), areas of disturbance further west at Rancheria Flat, and the National Park Service Maintenance/Warehouse and sewage treatment facilities are areas where greatest impacts to wildlife occur. In a regional, cumulative context, this development, coupled with the barriers of Highway 140 and, to a lesser extent, Foresta Road, relegate additional impacts that would result under the *Yosemite Valley Plan* to a relatively minor level.

Numerous factors were considered in evaluating impacts on wildlife as a result of proposed developments in the *Final Yosemite Valley Plan/SEIS*, in combination with existing development in the area (see Vol. IB, Chapter 4, Environmental Consequences–Wildlife).

629. Public Concern: The *Yosemite Valley Plan* should address the impacts of bridge removal on wildlife movement patterns.

“The SEIS also asserts that the removal of the bridges will have a beneficial impact on the wildlife habitat. However, I have personally observed deer and other wildlife utilizing the existing historic bridges to cross the Merced River. Therefore, elimination of the bridges may also result in significant adverse impacts to the movement of wildlife and result in more wildlife being injured as attempts are made to cross the few remaining auto and bus bridges that cross the Merced River. This impact was not addressed or analyzed in the SEIS.” (Business, San Diego, CA - #7884)

Response: Some species of wildlife opportunistically use bridges for travel; however, this type of wildlife movement is unnatural and, therefore, should not be preserved. Wildlife in Yosemite Valley do not require the use of bridges to freely move from one section of the Valley to another. One of the focuses of the *Yosemite Valley Plan* is the restoration of natural processes, of which wildlife movements is a component. Removal of bridges, along with restoration of contiguous and linked habitats, would help restore natural movement of wildlife in Yosemite Valley.

561. Public Concern: The *Yosemite Valley Plan* should account for the potential effects of vehicle-induced pollution on aquatic species.

“Ironically, while replacing bridges along the Merced River to ostensibly improve the health of fish, as advocated in the plan, the proliferation of asphalt will negate the eco-advantages. A primary constituent of asphalt is petroleum. Recommended for reading is the report of the Alaska Fisheries Science Center, ‘Life-History Consequences of Oil Pollution in Fish Natal habitat.’ This report by scientists at the Auke Bay Laboratory of the Science Center concludes that the toxicity of oil pollution to aquatic populations has been seriously underestimated.” (Individual, San Francisco, CA - #30241)

“Increasing human population in El Portal means increased non-point source pollution from parking lots, residential and working facilities, and vehicle deposits on road beds. This may adversely affect populations of aquatic insects, especially those that are sensitive to pollution, which may adversely affect bat, bird and fish populations.” (Individual, El Portal, CA - #7026)

Response: As long as motor vehicles are allowed in Yosemite National Park, some low-level contaminated water runoff could affect aquatic environments. Actions prescribed under the *Final Yosemite Valley Plan/SEIS*, however, are designed to reduce the threat of pollution to aquatic habitats. Some roads and parking areas would be moved out of meadow and riparian areas and either replaced by facilities out of the Valley or in more upland areas in the Valley. Water runoff from parking facilities would be collected and treated to remove pollutants. Reduction in the number of cars coming into Yosemite Valley, as prescribed in the *Final Yosemite Valley Plan/SEIS*, would help reduce sources of vehicle-related pollution. Such changes would represent an improvement over the present situation.

Some actions proposed in the *Final Yosemite Valley Plan/SEIS* that prescribe increased development in El Portal could carry the increased risk of non-point pollution. The *Final Yosemite Valley Plan/SEIS*, however, provides specific actions and mitigation measures that would limit such risk to a negligible level. Development within 100 feet of the river would be limited by the River Protection Overlay. Runoff from parking lots and residential and working areas would be collected for treatment. Effluent from all new facilities in El Portal would be piped into the existing sewage treatment system. Facilities that carry an inherent risk of causing pollution (e.g., fueling facilities) would be designed to limit the chance of spills and provide adequate containment and treatment of potential spills. The largest benefit to water quality in El Portal under the action alternatives in the *Final Yosemite Valley Plan/SEIS* would be the removal of the commercial bulk fuel facility. This facility poses the greatest risk of both catastrophic spills and continual, low-level pollution from runoff into the river and adjacent wetlands, as well as seepage into groundwater.

104. Public Concern: The *Yosemite Valley Plan* should establish an intensive trout management program for the Merced River.

“In my judgment, there is no excuse for the disappearance of the trout from the Merced River in the Valley. This is simply a sign of poor management. An intensive stocking program should be instigated. Bait fishing could be allowed around the campgrounds with restricted size and number limits—say nothing under 6 inches and no more than 3 per day. To make it more sporting for the true angler, an area should be set aside for artificial flies and lures only—perhaps at the lower end of the Valley. The 6 inch size and 3 per day should also apply here. With persistent stocking of trout in the 6 plus inch size, and with stringent size and take regulations, there is no reason why the Valley cannot once again be a wonderful family fishing opportunity. This system has worked in many other places throughout the state. This would add so much to the Park and the resources are readily available to accomplish it. Under the present situation, the Merced River running through the Valley is simply being wasted as a marvelous family fishing resource and opportunity.” (Individual, Laguna Niguel, CA - #387)

Response: This concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan*. No actions proposed under the various alternatives would change current management practices. The intent of the *Yosemite Valley Plan* is to prescribe restoration and redevelopment, improve protection of park resources, and improve the quality of visitor experience in Yosemite Valley. Fishery management



issues are addressed in the 1994 *Resources Management Plan*. Nonetheless, the *Final Yosemite Valley Plan/SEIS* would benefit fish populations in the Merced River by restoring riparian and meadow habitats.

The National park Service believes that a high quality, natural fishery can be provided in the Merced River by allowing natural river processes to occur, which would lead to rich and diverse fish habitats.

447. Public Concern: The *Yosemite Valley Plan* should account for potential effects of the proposed action on great grey owls.

“There is no discussion of the damage to great grey owl habitat from increasing traffic flow on the Old Coulterville Road.” (Civic Organization, Foresta, CA - #7640)

“I have a concern about the adverse impact on great gray owls in Big Meadow of having the NPS stable at McCauley Ranch. An NPS stable at South Landing would probably be better for the great gray owl population than one at Foresta because of less proximity to a large meadow.” (Individual, Columbia, CA - #7149)

Response: The slight increase in housing at Foresta, the relocation of concession and National Park Service stable operations to McCauley Ranch, and the possible establishment of a parking facility in Foresta would increase the amount of traffic through the area. Such traffic, however, is expected to have a minor to moderate effect on great gray owls. A vast majority of the habitat used by the owls in Big Meadow for wintering and staging (transiently used by owls migrating up from lower elevations) is well away from the road and proposed parking area, and traffic to the parking facility would not proceed beyond the area that is now the woodlot. Traffic associated with the stable and parking facility would primarily occur from late spring through early fall, when the owls would most often be at breeding areas in higher elevations. The National Park Service also recognizes that the parking facility could cause increased visitor use around Big Meadow, which could disturb the owls. Efforts will be made to manage visitor access to the meadow to protect the great gray owls that may still be in the area when the parking lot is in use. The small amount of housing that would be built in Foresta is expected to cause a minimal increase in traffic over the present level. Big Meadow was actively used by great gray owls before the 1990 fire, when there were over twice as many houses in Foresta than there would be under the actions considered in the *Final Yosemite Valley Plan/SEIS*.

623. Public Concern: The *Yosemite Valley Plan* should require an aggressive management plan to remove bear and deer populations from Yosemite National Park.

“As a long time visitor to Yosemite, I have watched the problem of bears and deer in the Valley, (and on some of the nearby hiking trails as well) grow to insufferable proportions. Not a tree can be planted without an ugly screen around it. The Valley is polluted at every turn with ugly bear-proof food lockers and one must even worry about a candy wrapper inadvertently left in a car, that might provoke a destructive bear attack. I have personal experience on the trails with bears destroying back packs, and threatening physical harm to children. All of this because of the misguided idea that ‘they were there first and have as much right to be there as we have.’ I have yet to see a bear, a deer, or even an elderberry long horned beetle or red-legged frog stand in wonderment at the beauty of El Capitan, or Mirror Lake. Bear and deer have no place in Yosemite Valley! They cannot be educated to conserve and preserve anything. There are plenty of places where they can and should be protected and allowed to roam, but not there. Because of its beauty, only humans who can truly appreciate it have a preemptive right to its beauty, only humans who can truly appreciate it have a preemptive right to unimpeded access to Yosemite Valley which supercedes the rights of any animal. I recommend the Park Service ignore the vociferous animal rights activists and uninformed nature lovers and begin immediately an aggressive program of judicious fencing to channel interlopers toward immediate capture and distant relocation along with appropriate negative learning experiences, to rid the Valley completely of bears, and most of the deer. This would go a long way toward restoring some of the flora which we are so concerned about. It would also cut down the gawking at a few deer in the meadows which cause traffic jams and people trampling vegetation chasing them around. Let people go to other parks if they want to see wildlife.” (Individual, Los Altos, CA - #3165)

Response: While management of wildlife falls outside the scope of the *Yosemite Valley Plan*, the National Park Service disagrees that human use of Yosemite National Park should be to the exclusion of some native wildlife species. Although conflicts between wildlife and humans occur in the park, management toward elimination of those conflicts through wide-scale removal of wildlife would be contradictory to the mission the National Park Service is charged to uphold. Such management would not only upset the ecology of Yosemite Valley, but also eliminate an important part of the visitor experience.



Section 4.7 ~ Air Quality

The effects of the proposed transportation plan on air quality in Yosemite National Park and upwind areas, some people contend, make it imperative that plans for Yosemite Valley stress air quality protection. Local pollution sources are perceived by many as a serious threat to the health of humans and the Valley ecosystem.

Given the importance of air quality protection, many respondents offer various suggestions for achieving this goal. One person recommends establishing air quality as an Outstandingly Remarkable Value on the El Portal section of the Merced Wild and Scenic River. Burgeoning development and diesel transportation systems, many predict, will contribute to air quality deterioration. Diesel fuel, they say, is a health hazard and its use is being phased out of many urban transportation systems. These respondents urge the same be done in Yosemite National Park.

People are also concerned with technical and administrative aspects of protecting air quality. Regulatory actions affecting Yosemite National Park, such as “the likely classification of Yosemite Valley as a nonattainment area for 8-hour ozone [levels],” one person says, require a discussion of regional issues and identification of mitigation measures within each of the alternatives. The complex nature of air quality data leads one person to ask that air quality statistics be conveyed clearly in language that the “non-scientific expert can understand.” “The untenable conclusion that air quality and natural quiet are not significant,” another advances, “are based on assumed results of a pilot test that has not yet occurred.”

Concerned that the transportation plan may impact air quality, respondents ask that the National Park Service provide emissions data for all proposed transit vehicles. A vocal contingent protests the increased use of diesel buses for public transportation. “It doesn’t take a rocket scientist,” one says, “to predict serious air quality problems.” Another implies that the addition of diesel buses will also encroach upon visibility.

People question the adequacy of the analysis for air quality outcomes in the *Draft Yosemite Valley Plan/SEIS*. Because of the way air moves in the Valley, an individual challenges the sample site selected to make predictions. This person suggests that gasoline fuel be compared with diesel fuel in the analysis before the National Park Service selects an alternative. A respondent also suggests that the *Final Yosemite Valley Plan/SEIS* should include the percentages that each fuel source contributes rather than leaving, “informed decisions on air quality impacts . . . to emotion and anecdote.”

People request further analysis of a variety of air pollution impacts. One respondent would like the final document to include information on the amount that motor vehicles contribute to ozone pollution in the Valley. Another would like an evaluation of health risks to Yosemite National Park visitors from airborne pollution and a description of provisions made to warn visitors of risks.

A commitment to using alternative fuels, many believe, would improve air quality in the Valley. “There has been no commitment,” one citizen states, “or contractual agreement by YARTS to shift from diesel fueled buses to alternative fuel vehicles.” The implementation timeframe for the plan allows plenty of time, according to one recreation organization, to explore “cleaner fuel alternatives.”

Respondents ask that the impacts of air pollution on natural resources be addressed in the *Final Yosemite Valley Plan/SEIS*. Because air in the Valley flows up a “chimney” to the Lyell Fork of the Merced, one person suggests that “there may need to be changes in use patterns and fuel choices in order to protect the air quality of the designated wilderness.” Several people are concerned that visible damage to ponderosa pines indicates a threat to vegetation from ozone pollution. They contend that the *Final Yosemite Valley Plan/SEIS* should specifically address ozone impacts on vegetation.

A number of people believe that campfire and cigarette smoke deteriorate air quality and pose a threat to human health. Valley campfires, respondents demand, should be prohibited to help remedy this problem. Some go even further, suggesting the *Yosemite Valley Plan* should also prohibit smoking in the park.

74. Public Concern: The *Yosemite Valley Plan* should emphasize air quality protection in Yosemite Valley.

“If Air Quality is not expressly stated in the Merced River Plan, it can legally be ignored in subsumed plans such as the Yosemite Valley Plan. Finally, by including Air Quality in the MRP and the YVP, the Park can use this mandate to help clean up upwind sources of pollutants that affect the Park. . . It could use this authority to impose on upwind sources of air pollution outside the Park to clean up the air that blows into the Park.” (University of California, Department of Environmental Science, Policy, and Management, Berkeley, CA - #138)

“The Park should take every measure to curb local pollution sources in the Valley for the health of the visitors that come to enjoy the pristine nature of the Park, and for the diversity of sensitive plants and animals which live in the Park.” (Department of Environmental Science, Policy and Management, University of California, Berkeley, CA - #138)

ESTABLISH AIR QUALITY AS AN OUTSTANDINGLY REMARKABLE VALUE

“Clean air quality should also be included as an ORV for the El Portal section of the Merced WSR. Air quality will be adversely impacted by residential emissions from homes and automobiles due to the doubling of the residential human population. Air quality will also be impacted by the use of a diesel bus shuttle system for employees. Environmental impacts from diesel are hazardous. Diesel is being legally outlawed and phased out of cities such as New York. The NRDC has won several cases condemning diesel bus emissions for adversely impacting public health.” (Individual, El Portal, CA - #7026)

Response: Air quality protection for Yosemite Valley and the rest of the park is very important because the area is affected by downwind sources in the San Joaquin Valley. Although air quality protection is not expressly stated in the *Merced River Plan/FEIS*, the National Environmental Policy Act (NEPA) requires that resources such as air quality and related values be included in the NEPA analysis. Both the *Merced River Plan/FEIS* and the *Final Yosemite Valley Plan/SEIS* meet this requirement by fully disclosing the current air quality conditions in the park and identifying potential air quality impacts of each alternative (see the Air Quality sections in Vol. IA, Chapter 3 and Vol. IB, Chapter 4). The inclusion of air quality in these two documents does not give the park authority to impose its mandate on sources of air pollution outside the park. The Federal Clean Air Act and its amendments and the California Clean Air Act provide legal guidance to control air pollution sources inside and outside the park. However, as a Class I airshed, Yosemite National Park has an important mandate to participate in decision making on new or modified air pollution source plans in the vicinity off the park.



454. Public Concern: The *Yosemite Valley Plan* should include a discussion of regional air quality issues and mitigation measures under all alternatives.

“Air quality is also an issue outside the Park boundaries for the regional air basin that includes Mariposa County, Tuolumne County and Yosemite National Park. This air basin will likely be classified in the near future as a non-attainment area for 8-hour ozone (O₃). Please include a discussion of the regional air quality issues and the mitigation that would be involved with all the Plan’s alternatives.” (Governor’s Office on Planning and Research, Sacramento, CA - #6584)

Response: The California Air Resources Board and local air districts are responsible for developing clean air plans or State Implementation Plans to demonstrate how and when California will attain air quality standards established under both the federal and California Clean Air Acts. For the areas within California that have not attained air quality standards, the Air Resources Board works with air districts to develop and implement state and local attainment plans. In general, attainment plans contain a discussion of ambient air quality data and trends; a baseline emissions inventory; future year projections of emissions, which account for growth projections and already adopted control measures; a comprehensive control strategy of additional measures needed to reach attainment; an attainment demonstration, which generally involves complex modeling; and contingency measures. Many of California’s State Implementation Plans rely on the same core set of control strategies, including emission standards for cars and heavy trucks, fuel regulations, and limits on emissions from consumer products. State law makes the Air Resources Board the lead agency for all purposes related to the State Implementation Plans. Local air districts and other agencies prepare State Implementation Plan elements and submit them to the Air Resources Board for review and approval, and the Air Resources Board forwards State Implementation Plan revisions to the U.S. Environmental Protection Agency for approval.

The National Park Service is active in its role as a federal land manager and makes recommendations to the U.S. Environmental Protection Agency and the California Air Resources Board regarding protection of air quality and related values in Yosemite National Park, which is a Class I airshed. The National Park Service also works with the local air quality districts during the State Implementation Plan process and in the review of New Source Review applications. If surrounding counties achieve nonattainment status, the National Park Service would be involved in conformity determinations as well. In this context, the National Park Service would work to protect the air quality of Yosemite National Park with the intent of also benefiting surrounding areas.

The *Final Yosemite Valley Plan/SEIS* also acknowledges that the California Environmental Protection Agency concluded that the ozone exceedances in 1995 in the southern portion of the Mountain Counties air Basin, which includes Mariposa County, were caused by transport of ozone and ozone precursors from the San Joaquin Air Basin.

195. Public Concern: The *Yosemite Valley Plan* should include clear documentation supporting air quality findings regarding Yosemite Valley.

“The NPS preferred Alternative 2 indicates air emissions in tons of pollution each year in a chart that is difficult to comprehend. It is a compilation of numbers that does not appear to be conclusively supported by data. Can this pollution information be conveyed more clearly? Can someone explain what this means in a way that the average, non-scientific expert can understand? Please provide the data that supports the stated information.” (Individual, Malibu, CA - #1164)

PROVIDE DOCUMENTATION SUPPORTING DETERMINATION OF OUTSTANDINGLY REMARKABLE VALUES

“Where is the data, and where are the studies which demonstrate that appropriate science-based research was employed to determine all aspects of the Outstanding Remarkable Values? Mere repetition of a false assumption does not make it true . . . These issues are central to diesel bus pollution. Based on modeling, the Park Service and BRW, Inc., have incorporated the untenable conclusion that air quality and natural quiet are not significant. This

conclusion permits an unproven and untested busing operation for mass transportation. The Valley Plan transportation elements are based on assumed results of a pilot test that has not yet occurred.” (Individual, Malibu, CA - #1164)

Response: The data provided in the tables in the air quality sections of Vol. IB, Chapter 4, Environmental Consequences, in the *Final Yosemite Valley Plan/SEIS* are the summary results of the modeling and analysis that are described in the Methodologies and Assumptions section in Chapter 4 and in Vol. II, Appendix I, Air Quality Data. Also in Chapter 4 is a comparative description of these data in relation to the No Action Alternative (Alternative 1). The conclusion of each potential air quality impact further delineates the type (i.e., beneficial or adverse) and intensity of the impact. Appendix I provides more supporting details on the ambient air dispersion modeling for carbon monoxide and PM₁₀ (particulate matter less than 10 microns) ambient air quality levels that was used in the air quality analysis. (Also see response to concern #318.)

318. Public Concern: The *Yosemite Valley Plan* should include detailed information regarding transit vehicle emission factors.

“What I’d like is some specific information on the visitor transit vehicles operated by YCS, whether government or YCS-owned, and the emissions factors used for these and other vehicles to estimate annual air emissions in the Valley Plan for 2000, 2005, 2015 for Alternative 1-No Action and Alternatives 2-5.” (Individual, Citrus Heights, CA - #2360)

Response: See Vol. II, Appendix I, Air Quality Data, in the *Final Yosemite Valley Plan/SEIS* for a description of air quality modeling used in air quality analysis for this document. Emission factors are a function of many variables, including vehicle speeds, vehicle types, vehicle technology mix, and meteorology. The gasoline and diesel emission factors generated by the California Air Resources Board model titled “EMFAC version 7G” are composite values that represent a mixed fleet of automobiles, trucks, and buses. Summary documents specific to air quality analyses, including emission factors, are available in the Yosemite Research Library. Because no emission factor data is available for the transit buses that currently operate in the Valley, the default values of EMFAC were used to estimate current and future emissions. The data used in the *Final Yosemite Valley Plan/SEIS* fill over 700 pages of spreadsheets. The emission factor raw data is voluminous and not easily summarized. The air emission results presented in the *Final Yosemite Valley Plan/SEIS* are most usable if viewed from a comparative basis rather than an absolute basis. From this comparative perspective, the reader can make a judgement on the benefits or drawbacks of the alternatives compared to the No Action Alternative.

92. Public Concern: The *Yosemite Valley Plan* should address potential increased diesel emission impacts in Yosemite Valley under proposed actions.

“The Plan calls for over 200 more diesel bus trips into the valley every day - pouring out substantially greater pollution than gasoline engines into a laterally enclosed valley. It doesn’t take a rocket scientist to predict serious air quality problems as per the L.A. Basin, Santa Clara and Livermore Valleys.” (Individual, Richmond, CA - #373)

“Over 40 chemicals in diesel exhaust are considered toxic air contaminants and have been determined by the federal and state EPA to be carcinogenic. . . As currently conceived, in the real world this shift in transportation would serve to make toxic air emissions, noise and visual pollution even worse. Yosemite is a Class I Area under the Clean Air Act. The intention of this is a non-degradation policy for visibility and air quality. The addition of diesel buses will further encroach on these values.” (Individual, No Address - #7337)

Response: Each of the action alternatives in the *Final Yosemite Valley Plan/SEIS* seeks to accommodate visitor travel needs at varying levels while protecting natural resources such as air quality and natural soundscapes. The availability of proven transit vehicle technology, supporting infrastructure, such as refueling and maintenance facilities, environmental characteristics (including noise levels and air emissions), and costs are all major factors in decisions related to transit vehicle selections.



The additional shuttle buses planned for all the action alternatives would displace numerous visitor private vehicles and the air emissions that they generate. The air emissions analyses in the air quality sections in Vol. IB, Chapter 4, which include the emissions from shuttle buses, indicates that there would be a beneficial impact on all emissions except nitrogen oxide emissions in all the action alternatives if diesel buses meeting existing emissions standards were used. The analysis also documents the emission impacts of alternative-fueled buses.

The park is a Class I area and is actively working with state and local governments to reduce regional emission that could impact Yosemite. In addition to working to improve regional air quality, the National Park Service is seeking to improve local air quality by aggressively pursuing cleanest available technology when considering future bus purchases. Moreover, the park is working with local, regional, and state transportation agencies on measures that would improve transportation-related air emission, including those from diesel buses.

75. Public Concern: The *Yosemite Valley Plan* should include a comparative analysis of gasoline and alternative fuels emission impacts on Yosemite Valley.

INCLUDE REPRESENTATIVE RANGE OF SAMPLE SITES

“Comparisons between alternatives were based on one stretch of road, between Sentinel Bridge and Yosemite Lodge on the north side of the Valley, considered the ‘worst case scenario’ piece of road in the Valley. However, the use of this particular piece of road is entirely responsible for the different Air Quality outcomes of the Alternatives because of the relation between the locations of this road, Taft Toe, and other major parking areas. For example, it makes the Taft Toe Alternatives (3,4) look better because traffic would then not pass through this particular stretch of road. However, air pollution knows no such area restrictions. Air pollution from parking and traffic at Taft Toe will diffuse to all parts of the Valley and would be no different than air pollution at Yosemite Lodge and Curry Village. This is a poor way to have compared plans and it manipulates the results to appear different than they would actually be.” (University of California, Department of Environmental Science, Policy, and Management, Berkeley, CA - #138)

INCLUDE EVALUATION OF SWITCHING FROM GASOLINE TO ALTERNATIVE FUELS

“Comparisons were made on the basis of emissions from certain fuel types: diesel, CNG propane and fuel cells. . . Why was there no consideration of the emissions from the most common fuel type of the 6000 cars that visit the Valley daily during peak season: Gasoline? And why was there no discussion of the effect [of] simply implementing new fuel technologies in Alternative 1, which must certainly be the plan for the status quo? I believe it probably makes the other alternatives look better. I believe that the status quo might actually look the best if such comparison were made.” (University of California, Department of Environmental Science, Policy, and Management, Berkeley, CA - #138)

Response: Emissions from gasoline-powered vehicles (both visitor and park service) that enter the Valley during the peak season are included in the emission totals for all alternatives and for all years. The column subheadings Diesel, Compressed Natural Gas (CNG), Propane, and Fuel Cell (FC) that are in the tables documenting emissions forecasts in Vol. IB, Chapter 4, Environmental Consequences, refer to the type of fuel technology that was assumed in each scenario for the in-Valley and out-of-Valley shuttle bus fleets operating in the Valley.

The effect of newer vehicles with improved emission control systems replacing older vehicles over time is reflected in the latter years for all alternatives on the same basis. This is an inherent feature of the Emission Factor (EMFAC) model and was not altered for any alternative. The use of alternative fuel/propulsion technologies for the shuttle bus fleet was not considered in the No Action Alternative because implementing these fuels would require the construction of new facilities (e.g., fueling stations) that could not be constructed without conducting environmental compliance procedures.

620. Public Concern: The *Yosemite Valley Plan* should include an analysis of the percentage contribution of each air pollution source.

“I believe it would be useful for the decision process if there was a study, perhaps ongoing, of the sources and percentage contribution of each air pollution source and component. That sort of approach has certainly proved enlightening with regard to snowmobiles in Yellowstone. Attacking high profile but ultimately marginal sources would divert energy and resources from more productive efforts and without an understanding of the air emission budget of the Valley informed decisions on air quality impacts are left to emotion and anecdote. Are automobiles still the main problem after thirty years of emission control or are effectively unregulated diesel buses, both park concessionaire and package tour, contributing more to compromise Yosemite air quality?” (Individual West Chester, PA - #6411)

Response: Existing sources of air pollution within the Valley are summarized in Vol. IA, Chapter 3, Affected Environment, of the *Final Yosemite Valley Plan/SEIS*, in the table titled “1998 Estimated Air Emissions in Yosemite Valley.” The table includes stationary sources, such as heating equipment, generators, fireplaces, and fuel storage tanks; area sources, such as campfires; and mobile sources, such as automobiles and buses. Although the data presented in the table are in tons per year for each criteria pollutant, percentages are readily calculated. Also, although emissions from automobiles and buses are not broken out in the table, a review of the data indicates that automobiles are the largest source of air pollution in the Valley.

621. Public Concern: The *Yosemite Valley Plan* should include an analysis of motor vehicle contributions to ozone pollution.

“The improvements made in air quality in all the alternatives in relation to Alternative 1, the status quo, have entirely to do with several very faulty ways of representing the data. This is appalling to me. First, all alternative comparisons were made on VOC, CO, NOx, SO4, and PM10. Why was there no discussion of one of the primary pollutants in the Park for which the Park is already out of attainment at the National Level: Ozone? . . . While much ozone comes from outside the Valley, the 6000 cars and 63 buses on average that visit the Valley daily during peak season contribute to the ozone problem in the Valley.” (University of California, Department of Environmental Science, Policy and Management, Berkeley, CA - #138)

Response: The *Final Yosemite Valley Plan/SEIS* contains an analysis of air pollutants generated in Yosemite Valley from visitor, park, and concessioner vehicles for each of the alternatives. Although cars, buses, and other vehicles operating in the park do contribute to the ozone problem, they do not emit ozone directly. Ozone is a reactive photochemical pollutant formed when volatile organic compounds and compounds of nitrogen oxide are emitted into the atmosphere and react with sunlight. This is why the alternative comparisons were made on the basis of the pollutants that are generated directly by vehicles. These include volatile organic compounds, carbon monoxide, compounds of nitrogen oxide, sulfur dioxide, and particulate matter under 10 microns emissions. Analogous emissions associated with construction proposed in the action Alternatives also were calculated for comparative purposes. The major source of particulates in the Valley is the road dust generated by vehicles. Particulates also are generated by diesel exhaust from tour buses and Valley shuttles, and these are included in the tables presented in the air quality impact analyses in Vol. IB, Chapter 4.

197. Public Concern: The *Yosemite Valley Plan* should include an analysis of health risks to Yosemite National Park visitors resulting from diesel emission exposure.

“In the Valley, campers will be most exposed to the effects of carcinogenic diesel. Please calculate the level of carcinogenic risk and exposure to campers who will camp for two weeks in the Valley.” (Individual, Malibu, CA - #1164)

Response: Over the 15-year period considered in the air quality analysis in the *Final Yosemite Valley Plan/SEIS*, any of the action alternatives would reduce air emissions generated in Yosemite National



Park, which should result in corresponding improvements in air quality. Ozone and particulate matter are monitored in the Valley, and although they have exceeded state standards several times in recent years, they have not exceeded national standards for these same time periods. The air quality analysis presented in the *Draft and Final Yosemite Valley Plan/SEIS* indicated that there would be a negligible increase (less than 1%) in nitrogen oxide emission generation by 2015 for the Preferred Alternative compared to the No Action Alternative, while the other vehicle pollutants, including particulate matter from vehicles, would decline. The *Final Yosemite Valley Plan/SEIS* analysis of one congested road segment in the Valley indicated that one-hour average particulate matter and carbon monoxide ambient air levels would actually decrease 30% to 50% for the Preferred Alternative by 2015 compared to the No Action Alternative. These analysis results do not indicate that health risks to visitors and employees would increase.

196. Public Concern: The *Yosemite Valley Plan* should include measures to inform the public of potential health threats resulting from vehicle emissions in Yosemite Valley.

“How will visitors be warned of [the] carcinogenic nature of the pollution created in the Valley by this transportation system? Will the NPS be posting signs in highly visible locations all throughout the Park, the Valley, along transportation routes and at all bus transit stations and facilities where people will load and unload so that the public is adequately informed as required by law? What are the cumulative impacts to public health and safety?” (Individual, Malibu, CA - #1164)

Response: Ozone and particulate matter are monitored in the park, and although they have exceeded state standards several times in recent years, they have not exceeded national standards for these same time periods. The air quality analysis presented in the *Draft and Final Yosemite Valley Plan/SEIS* indicated that there would be a negligible increase (less than 1%) in compounds of nitrogen oxide emission generation by 2015 for the Preferred Alternative compared to the No Action Alternative, while the other vehicle pollutants, including particulate matter from vehicles, would decline. The *Yosemite Valley Plan* analysis of one congested road segment in the Valley indicated that one-hour average particulate matter and carbon monoxide ambient air levels would actually decrease 30% to 50% for the Preferred Alternative by 2015 compared to the No Action Alternative. These results do not indicate that health risks to visitors and employees would increase.

717. Public Concern: The National Park Service should demonstrate its commitment to the use of alternative fuel vehicles in the *Yosemite Valley Plan*.

“In Volume III, page III-14 there is the statement ‘The National Park Service in Yosemite is committed to the use of alternative fuel vehicles, and to assuring that conventional combustion vehicles are functioning to minimize potential air quality impacts.’ This was in response to a public comment on air quality. This ‘commitment’ is not mentioned on page 2-150; nor is there any suggestion of a timetable or protocol to achieve this commitment. Instead, the document reads: ‘Apply best available clean fuel technology as it becomes available, to the extent feasible. . . There has been no commitment or contractual agreement by YARTS to shift from diesel fueled buses to alternative fueled vehicles. This . . . makes the assumption for the Action Alternatives totally inappropriate.’” (Conservation Organization, Mariposa, CA - #9224)

“The Park should continue to explore with great passion within that 15-year timeframe cleaner fuel alternatives, as suggested in Chapter 2-23, Mitigation measures common to all Action alternatives. Harmful emissions from diesel buses will continue to contribute to a reduction in visibility that already obscures the towering rock formations that rise from the valley floor.” (Recreation Organization, Silver Spring, MD - #10092)

Response: The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* states that the National Park Service would consider low noise, low emissions, cost-effectiveness, and the use of alternative fuels as the primary criteria for acquiring in-Valley and out-of-Valley shuttle bus fleets.

The National Park Service is currently moving toward the use of the most clean and quiet transit vehicles feasible in the Valley, and has committed in Vol. IA, Chapter 1 of the *Final Yosemite Valley Plan/SEIS* to continue strategies to implement technologies that reduce mobile sources of air pollution.

598. Public Concern: The National Park Service should analyze the impacts of air pollution in Yosemite Valley on the Yosemite Wilderness.

“If the wilderness up around the Lyell Fork of the Merced is at the top of a ‘chimney’ leading from Yosemite Valley and [there are] all those tons of burning fake logs and diesel fuel, there may need to be changes in use patterns and fuel choices in order to protect the air quality of the designated wilderness.” (Individual, West Chester, PA - #6411)

Response: Yosemite National Park’s mandate is one of environmental protection, and each of the action alternatives in the *Final Yosemite Valley Plan/SEIS* proposes to limit impacts on resources, including air quality, from internal park operations and visitor use. For example, the Preferred Alternative proposes measures to reduce visitor vehicle traffic and associated air emissions in the Valley relative to existing conditions. The park is using sustainable design and development techniques for future buildings and operations in the park where feasible to achieve reductions in park emissions and energy consumption.

There are numerous air quality monitoring stations in and near the park that analyze both gaseous and particulate pollutants. For example, monitors in the park include an ozone monitor along with an Interagency Monitoring of Protected Visual Environments site at Turtleback Dome, and a particulate monitor at the park headquarters near the visitor center in Yosemite Valley. The park has also been involved in biological effects research and monitoring related to air pollution for many years. Research has determined that ponderosa and Jeffrey pine trees, two key species in Yosemite National Park, are highly sensitive to tropospheric ozone. The park currently monitors both species for early detection of change.

The *Final Yosemite Valley Plan/SEIS* also acknowledges that the California Environmental Protection Agency concluded that the ozone exceedances in 1995 in the southern portion of the Mountain Counties air Basin, which includes Mariposa County, were caused by transport of ozone and ozone precursors from the San Joaquin Air Basin.

93. Public Concern: The *Yosemite Valley Plan* should address air pollution impacts on vegetation in Yosemite Valley.

“Although not enforced by law, air quality standards to protect vegetation are even lower than those for people. . . The protection of trees, wildflowers, shrubs and grasses within Yosemite Valley should provide substantial incentive to improve air quality. Ponderosa pine are the most sensitive tree in the Sierra to ozone damage. In terms of vegetation injury and human health concerns, they can be considered the canary in the coal mine. . . Although the results of ozone damage studies on the Valley floor are presently unavailable, ozone damage has been observed on ponderosa and the less sensitive Jeffrey pine throughout the Park.” (University of California, Department of Environmental Science, Policy, and Management, Berkeley, CA - #138)

“A third of conifers in Yosemite below 6,000 feet in elevation are seriously damaged, dying or dead due to air pollution, this aspect should be of utmost importance in any consideration of Yosemite’s future.” (Individual, San Francisco, CA - #30241)

Response: The National Park Service is aware of its responsibility to curb air pollution sources within Yosemite National Park to protect not only visitor and employee health but also welfare or non-health values, such as visibility, vegetation, and wildlife. In order to monitor ozone trends in the Valley, the park has operated an ozone monitor at Turtleback Dome for more than a decade. The park has been involved in biological effects research and monitoring related to air pollution for many years. Research has determined that ponderosa and Jeffrey pine trees, two key species in Yosemite National Park, are highly sensitive to tropospheric ozone. The park currently monitors both species for early detection of change.



The *Final Yosemite Valley Plan/SEIS* also acknowledges that the California Environmental Protection Agency concluded that the ozone exceedances in 1995 in the southern portion of the Mountain Counties Air Basin, which includes Mariposa County, were caused by transport of ozone and ozone precursors from the San Joaquin Air Basin. The park's mandate is one of environmental protection, and its goal is to limit impacts to natural resources, including air quality and vegetation, from park operations and visitor use.

716. Public Concern: The *Yosemite Valley Plan* should identify campfire smoke as a source of air pollution.

"The SEIS fails to consider campfire smoke as an identifiable point source of air pollution. The only sources considered were vehicles, construction and demolition activities. As can be seen on any evening in the Valley, significant air quality impacts are created by the hundreds of individual campfires permitted in the campgrounds. This impact must be included in the evaluation of alternatives. Clearly an alternative with fewer campsites and thus fewer campfires has a beneficial effect compared to the current situation." (Individual, Union City, CA - #4404)

Response: In Vol. IA, Chapter 3, Affected Environment, Air Quality, in the *Draft Yosemite Valley Plan/SEIS*, campfires were identified as sources of particulate matter, carbon monoxide, and volatile organic compounds in the Valley. There are currently 475 campsites in the Valley, and under Alternative 2 (Preferred Alternative) in the *Final Yosemite Valley Plan/SEIS*, the number would increase by approximately 5% to 500 campsites. Alternatives 3 and 4 would reduce the number of sites to 450 and 441, respectively, while Alternative 5 increases campsites to 585. The park has recognized that campfires make significant contributions to air pollution in the Valley and has taken measures to reduce their impact. For example, campfires are permitted only from 5:00 P.M. until 10:00 P.M. from May 1 to October 15, and campfires are permitted only in established fire rings. Collection of firewood, including "dead and down" wood, is prohibited in the Valley, as is cutting live or dead trees and attached limbs. These rules are widely disseminated to park visitors through the park's free quarterly newspaper (*Yosemite Guide*), web site (www.nps.gov/yose/), and other media.

506. Public Concern: The National Park Service should ban smoking within Yosemite National Park.

"Ban smoking within the Park (or allow it only in designated areas adequately separated from others). Some of the worst air pollution visitors actually experience in Yosemite comes from smokers (especially employees). At least ban smoking from prime places such as Glacier Point." (Individual, Los Altos, CA - #20564)

Response: This concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan*.

758. Public Concern: The *Yosemite Valley Plan* should commit to pollution prevention practices for shuttle bus fleet maintenance.

"Alternative 2, the preferred alternative, estimates the need for 74 shuttle buses to provide both in-Valley and out-for-Valley shuttle bus service. The SEIS does not provide detail on fleet maintenance. Recommendation: In the Final EIS commit to pollution prevention practices for fleet maintenance. (Environmental Protection Agency, San Francisco, CA - #10295"

Response: This concern is acknowledged, and Vol. IA, Chapter 2 Alternatives, Mitigation Measures, of the *Final Yosemite Valley Plan/SEIS* includes a requirement for the use of pollution prevention practices for maintenance and operations of the shuttle bus fleet prescribed by the *Yosemite Valley Plan*. After the shuttle bus maintenance facilities prescribed in the *Yosemite Valley Plan* are operational, shuttle bus operations and maintenance will be required to comply with the Yosemite National Park Pollution Prevention Control Program and the Hazardous Waste Minimization Plan. This program meets the guidelines prescribed by the Environmental Protection Agency.

Section 4.8 ~ Scenic Resources

Several people commenting on the *Draft Yosemite Valley Plan/SEIS* are concerned with management of scenic resources within the Park. The historic bridges in Yosemite National Park, several respondents assert, should be retained as scenic resources for future park visitors to experience and appreciate. One individual argues that removal of these bridges constitutes “significant and unmitigated” impacts to the “public’s ability to view these masterpieces in a natural setting.” Another refers to digitally simulated images in the 1997 *Draft Yosemite Valley Implementation Plan* as supporting evidence for retention of specific bridges as significant scenic resources. Expressing appreciation for Yosemite’s scenic sky views, several respondents applaud park planners for proposing nighttime lighting restrictions in the *Draft Yosemite Valley Plan/SEIS*. Others advocate a ban on airline flights over the park to reduce visual pollution.

752. Public Concern: The *Yosemite Valley Plan* should address the potential impacts of bridge removal on scenic resources.

“The Scenic Resources Sections of the SEIS do not at all discuss the removal of the historic bridges or otherwise address the loss of the public’s ability to view these masterpieces in a natural setting. Further, it does not discuss or analyze the critical views and vantage points which would be lost by the destruction of the bridges, the paved roadways, and the pedestrian and bicycle paths. The views to and from these existing bridges and access ways are magnificent and provide for breathtaking views of North Dome, Half Dome, Glacier Point and Yosemite Falls. As the existing vegetation in the Valley continues to grow larger, the views of these natural features will continue to be more impaired. Therefore, these historic bridges as well as paved and improved pathways should have been identified and analyzed as ‘scenic resources’ and ‘vantage points’ in the SEIS. The loss of such viewing opportunities will result in significant and unmitigated, direct and cumulative adverse impacts to the scenic resources and the ability of the public to see and enjoy such resources.” (Business, San Diego, CA - #7884)

“From the perspective of the quality of visitor experience, the bridges and other resources have clear scenic value. Digitally simulated images in the September, 1997 Draft Yosemite Valley Plan SEIS (pgs. 31-33, Fig’s 1-6) make it clear that the surroundings of the historic Stoneman, Ahwahnee, and Sugar Pine Bridges look more attractive, more diverse, and ‘richer’ with the bridges present than they would with the bridges removed. The same is true of the Ahwahnee Meadow Road, Lower Pines Campground, and Upper Pines Campground (pgs. 34-36, Fig’s 7-12).” (Individual, Berkeley, CA - #4784)

Response: There is agreement by many that the historic bridges in Yosemite Valley are aesthetically pleasing and contribute to the scenic value of the Valley. However, the 1980 *General Management Plan* specifically describes and emphasizes the protection of the exquisite natural beauty as a major goal; the beauty of human-made structures is not mentioned as a criterion for evaluation. Protection of the Valley’s natural beauty is one of the major criteria of the *Draft* and *Final Yosemite Valley Plan/SEIS*. Although up to two of the historic stone-veneer bridges would be removed, adjacent historic bridges would preserve this legacy and multi-use paved trails would continue to provide visitor access to various areas affected by bridge removal.

751. Public Concern: The *Yosemite Valley Plan* should require reduced nighttime lighting.

“The proposed changes in nighttime lighting to make the pedestrian intersections safer while increasing the sky’s visibility will be appreciated.” (Individual, San Francisco, CA - #671)

“I was very pleased to see that the ‘night sky’ is being considered and hopefully protected. I strongly support the limitation of lighting to preserve that increasing rare treat of a truly dark sky.” (Individual, Berkeley, CA - #9238)



Response: The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* proposes to implement a lighting guideline that would eventually reduce impacts to the night sky by reducing light pollution at all new and existing developed facilities in Yosemite Valley (see Vol. IA, Chapter 2, Alternatives, Mitigation Measures Common to all Action Alternatives—Night Sky).

642. Public Concern: The National Park Service should consider a ban on airline flights over Yosemite National Park.

“The number of jets that fly over the Park make a plaid sky - not natural, nor scenic. Could the park airspace become a no fly zone, rather than a pilot’s scenic tour on the way to San Francisco.” (Individual, No Address - #4788)

Response: This concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan*. This concern is being addressed on a national level by the National Park Service.

Section 4.9 ~ Cultural Resources

Public comments referring to the management of cultural resources within Yosemite Valley reflect a wide range of interests. Several respondents address what they perceive as deficiencies in the descriptions, analyses, and conclusions presented in the *Draft Yosemite Valley Plan/SEIS*. Others propose alternative management directions for either specific or general Yosemite cultural resources. A few respondents encourage the National Park Service to more consistently recognize the legal rights of all neighboring American Indian tribes and engage these government partners in planning efforts. To address these concerns, analysis in this section is divided into three subsections: General Management Direction, Historic Features, and American Indian Cultural Resources.

4.9.1 ~ General Management Direction

Many people submitting comments on the *Draft Yosemite Valley Plan/SEIS* address the general direction they believe the National Park Service should pursue in managing cultural resources. Numerous respondents argue for the retention of remarkable structures within the Valley because of their cultural value in understanding the history of the park and human efforts to enhance the Yosemite experience. In advocating historic preservation, some individuals acknowledge the need for compromises. “Unless we plan to remove all cultural impacts from the park,” an Oakhurst resident proclaims, “we need to honestly acknowledge that we value stone bridges, chapels, and historic hotels more than we care about their environmental impacts.” The State of California’s Office of Historic Preservation contends that the *Final Yosemite Valley Plan/SEIS* should provide justification for negative impacts on some Yosemite Valley historic properties and identify alternative management practices that will maintain the integrity of the Valley’s cultural assets.

Some organizations and individuals single out what they believe to be defects in the *Draft Yosemite Valley Plan/SEIS* regarding the management of cultural resources. Claiming resource maps in the *Draft Yosemite Valley Plan/SEIS* are insufficient for public participants and park leadership to make informed assessments of the proposed alternative actions, a non-governmental organization requests that all maps be redrawn to accurately and consistently identify historic features. The California Governor’s Office of Planning and Research admonishes the National Park Service to ensure impact significance assessments are in compliance with the National Historic Preservation Act. Removal of archeological data from El Portal impact zones, insists one Yosemite area resident, is not justifiable mitigation to meet cultural resource mandates. This individual postulates, “Using data recovery to reduce the intensity of adverse impacts is misleading. The resource is permanently destroyed.” Reflecting on the *Yosemite Valley Plan*’s cultural resource objectives, a few individuals question the efficacy of removing existing buildings from identified burial sites. One person argues that such an action will establish a legal precedent to question the retention of all developments within Yosemite Valley.

101. Public Concern: The *Yosemite Valley Plan* should acknowledge the value of human cultural sites in Yosemite Valley.

“If we’re trying to restore Yosemite to a natural state, where the river could flow freely, and trees and meadows could exist without buildings and roads, we would apply that principle evenly and remove all human vestiges from



the valley. In reality, we are agreeing on a park that includes human impacts to an extent that pleases us, for our own aesthetic and cultural values. Unless we plan to remove all cultural impacts from the Park, we need to honestly acknowledge that we value stone bridges, chapels, and historic hotels, more than we care about their environmental impacts.” (Individual, Oakhurst, CA - #328)

Response: Given the broad goals of the 1980 *General Management Plan* and the guidance in the *Merced River Plan*, the National Park Service has considered actions that preserve, protect, and restore both natural processes and cultural resources. The National Park Service has relied on the best available scientific information to identify the nature and extent of environmental degradation, including impacts that are caused by some of the historic structures. The National Park Service has also evaluated the historical significance of structures in terms of National Register criteria to adequately consider their importance. To achieve higher priority objectives (such as restoring natural processes or reconfiguring developed areas to meet operational needs), the National Park Service has proposed to remove some of these important historic resources. In general, however, the National Park Service will continue to preserve and protect other high priority cultural resources to the degree feasible because of their historic and cultural value.

481. Public Concern: The *Yosemite Valley Plan* should discuss why adverse effects on historic properties cannot be avoided.

“Does the document include a full and fair discussion of the conditions under which, and the reasons why, avoidance of adverse effects on historic properties could not be achieved? . . . Does the document clearly identify and adequately assess alternatives that will avoid adverse effects to historic properties? Does the document present all practicable means that will avoid adverse effects to historic properties? . . . Using the foregoing benchmarks, I find the document to be deficient because it does not adequately identify, discuss, and assess alternatives and specific actions that would avoid adverse effects to historic properties.” (State of California, Office of Historic Preservation, Department of Parks and Recreation, Sacramento, CA - #30232)

Response: The *Yosemite Valley Plan* includes a number of planning criteria that are based on the five broad goals of the *General Management Plan*, and that were used to guide the development of alternatives. These criteria seek to minimize impacts to park resources. Cultural resource-related criteria focus on protection, preservation and adaptive reuse of cultural resources. The *Yosemite Valley Plan* also identifies highly valued cultural resources and seeks to preserve and protect those values to the greatest extent possible. In addition to cultural resources, the *Yosemite Valley Plan* identifies criteria for natural resources, visitor experience and park operations. The National Park Service selected alternatives for inclusion in the *Yosemite Valley Plan* based on the extent to which each alternative would meet the planning criteria, and thus the goals of the *General Management Plan*. The integration of the goals of the *General Management Plan* within each alternative required the careful assessment of the relative importance and relationship of all park values. In some cases, compromises among resources were necessary because there are inherent conflicts among the goals. These compromises are reflected in the alternatives.

In response to public concerns regarding adverse effects to historic properties, a number of actions that would result in adverse effects to historic properties have been revisited in the *Final Yosemite Valley Plan/SEIS*. The historic Sugarpine Bridge would be removed as proposed. Stoneman Bridge would be removed unless continued hydrologic monitoring demonstrates appreciable improvement in the natural hydrologic flow of Merced River after removal of Sugarpine Bridge. The Superintendent’s Residence and associated garage would be relocated to Yosemite Village and adaptively reused. The intensity of impacts to Camp Curry Historic District would be reduced by retention of additional tent cabins, retention of additional contributing structures and final site design that would retain the general configuration and historic design. The National Park Service Operations Building (Fort Yosemite) and associated buildings would be further evaluated to determine the possibility of adaptive reuse. In general historic properties would be preserved unless it is determined that preservation is infeasible or impractical. In

implementation of the *Yosemite Valley Plan*, the National Park Service would follow stipulations of the Yosemite Programmatic Agreement and seek to avoid adverse effects to historic properties wherever possible.

563. Public Concern: The *Yosemite Valley Plan* should identify and include cultural resources on maps for each alternative.

“We continue to be frustrated by the organization and graphic layout of Yosemite National Park planning documents. As was the case with the VIP and the Wild and Scenic River Plan, cultural resources affected under one or more of the various alternatives have not been adequately identified and mapped. For example, the Cultural Resources section of Table A in the Executive Summary makes mention of only a fraction of the historic resources which would be lost under the various alternatives. Likewise, while plates for Alternative 1 clearly illustrate the existing conditions, including what appear to be all existing buildings, no attempt is made to identify historic structures. The plates for the action alternatives illustrate areas for redevelopment and natural resource restoration, but do not indicate what cultural resources would be lost.” (Non-Governmental Organization, San Francisco, CA - #7885)

Response: The revised plates in the *Final Yosemite Valley Plan/SEIS* (Vol. IC) distinguish historic structures from modern facilities. By comparing plates for each action alternative with the plates for Alternative 1, one can see which historic structures would be lost. While there are no graphics dedicated to displaying cultural resources information, the highly valued resources plate depicts both natural and cultural resources.

453. Public Concern: The *Yosemite Valley Plan* should clarify the term “minor adverse effect” with consideration for the National Historic Preservation Act.

“Please explain ‘minor adverse effect’ as used in Volume Ib, 4.2-62 through 4.2-74 and tables 4-40 through 4-42. An explanation of the term is appropriate since Section 106 [Section 110] of the National Historic Act uses the terms ‘no adverse effect’ and ‘adverse effect’ and does not include ‘minor adverse effect.’” (Governor’s Office of Planning and Research, Sacramento, CA - #6584)

Response: The National Environmental Policy Act (NEPA) and National Historic Preservation Act (NHPA) employ different approaches to assessing impacts (see Vol. IB, Chapter 4, Methodology, in the *Final Yosemite Valley Plan/SEIS*). Section 106 of the NHPA states that an undertaking would have an adverse effect, no adverse effect, or no effect. The Council on Environmental Quality’s implementing regulations for NEPA require that impacts must also be described in terms of their intensity as either major, moderate, minor, or negligible. Impacts on cultural resources are described in Chapter 4, Environmental Consequences. Effects (under NHPA) that would result from implementing each alternative are described in the Section 106 Summary, found at the end of each cultural resources environmental consequences section. For clarity, the term “effect” is used when discussing consequences under NHPA; the term “impact” is used in discussions of environmental consequences under NEPA.

685. Public Concern: The *Yosemite Valley Plan* should evaluate the cumulative impacts of increased human population in El Portal on cultural resources.

“Irreparable major adverse impacts to cultural resources from trampling, looting, and direct loss from development will occur in El Portal due to construction, human population increase and activities such as recreation. Mitigation using data recovery means a net loss of non-renewable resources. Using data recovery to reduce the intensity of adverse impacts is misleading. The resource is permanently destroyed.” (Individual, El Portal, CA - #7026)

Response: The adverse impacts to archeological resources are acknowledged in Vol. IB, Chapter 4, Environmental Consequences. As explained in the methodology for impact analysis, the reduction in intensity of impact in terms of the National Environmental Policy Act is based on an estimation of the effectiveness of the mitigation. Data recovery is an accepted mitigation for archeological resources for



which the most important value is the information they contain. By conducting such excavations, the information contained within the resource is retrieved; and the material cultural remains are maintained as part of Yosemite's permanent museum collection. However, the National Park Service acknowledges that even data recovery ultimately results in the partial loss of the resources. It is for this reason that under the National Historic Preservation Act, Section 106 summary, the National Park Service considers actions associated with implementing an alternative to have an adverse effect on historic properties in spite of the mitigating measures.

754. Public Concern: The *Yosemite Valley Plan* should retain existing developments on burial sites in Yosemite Village.

"The proposal to 'remove development from known burials in Yosemite Village' is a Trojan Horse of monumental proportions. This suggestion may haunt the Park Service forever in terms of incessant law suits by those who claim that every development within the Valley is built upon a burial site. Obviously new facilities should not be constructed on known burial plots, whether they are Indian, Spanish-Californian, or United States pioneer settlers. However, what has been done, has been done and is a part of history." (Individual, Long Beach, CA - #5644)

"Do not allow the dead to control current land use. Burial sites should not impact development. If relatives are sensitive about the issue, reinter the dead elsewhere – preferably out of the Valley." (Individual, No Address - #7305)

Response: The National Park Service is committed to sensitive treatment and protection of areas highly valued by the park-associated American Indian tribes. The presence of ancestral remains in Yosemite Valley is an important cultural link for present-day generations of Indian people. In keeping with federal laws, regulations, and National Park Service policy, the National Park Service continues to consult with these tribes regarding treatment of resources such as burial areas. Retaining existing development at known burial areas requires routine maintenance and other actions that would have the potential to disturb buried remains. Disinterring and relocating human remains is an action not considered by the National Park Service unless there are no practicable alternatives. Removing development from two known burial areas in Yosemite Valley and El Portal is an important action for restoration of these special places.

4.9.2 ~ Historic Features

Proposed actions in the *Draft Yosemite Valley Plan/SEIS* to remove some historic features from the Valley while retaining others elicit vehement responses from a good number of individuals and organizations. Many respondents declare that the National Park Service must fully assess the cultural value of all historic structures before deciding to remove notable features from Yosemite Valley. Synthesizing concerns expressed by several respondents, a nongovernmental organization professes, "No action that is likely to negatively affect historic resources should be undertaken unless the short- and long-term impacts are fully understood." Some emphasize the contribution of historic features to the visitor's experience of Yosemite National Park as justification to retain certain properties and landscapes. Several respondents suggest relocating historic structures or redefining uses of notable features in order to achieve multiple resource goals (please see the following paragraph for further analysis of related proposals). One organization highlights legal obligations that dictate the *Yosemite Valley Plan* must minimize impacts to properties on the National Register of Historic Places. However, the same organization accuses Park leadership of focusing too much attention on protection of National Historic Landmark properties while ignoring impacts to landscapes proposed for the National Register. Further, the group suggests that the *Final Yosemite Valley Plan/SEIS*, as an aide in educating the general public, should include a graphic representation of the contributing elements to the Yosemite Valley Cultural Landscape District. Respondents propose that a variety

of historic structures be retained: stone bridges (see Section 4.10.2.a for more detailed analysis of historic bridges), the Superintendent's House (Residence 1), Curry Orchard, the Cascade Residences, Curry Village, Camp 4 (Sunnyside Campground), buildings in the current maintenance area, and all historic corridors.

Numerous people responding to the *Draft Yosemite Valley Plan/SEIS* present suggestions on how the National Park Service can meet cultural resource protection requirements while also achieving ecological restoration or public access mandates. An alternative to removing historic features from the Valley, several respondents assert, is to retain them for other park management objectives. "Adaptive reuse alternatives," one non-governmental organization protests, "are not adequately presented and evaluated as an alternative to destroying historic structures." Conversely, some individuals espouse natural resource goals and public safety concerns must take precedence over historic preservation. Yosemite Valley's orchards, according to one person, should be eliminated because they increase the potential for encounters between humans and bears. Another respondent notes rockfall hazards as justification to remove the Le Conte Memorial Lodge.

528. Public Concern: The *Yosemite Valley Plan* should recognize all historic structures within the Yosemite Valley as highly valued resources.

"We are concerned that many actions proposed are based on incomplete data and insufficient data and an incomplete understanding of the complex system that Yosemite Valley represents. In the twenty years since the GMP was adopted, there have been significant advances in the fields of natural and cultural resource management. For example, at the time of the original GMP, cultural landscapes were not even a recognized resource type. However, there is much still to be learned. The National Trust believes that no action that is likely to negatively affect historic resources should be undertaken unless the short and long-term impacts are fully understood." (Non-Governmental Organization, San Francisco, CA - #8925)

"We remain frustrated with the exaggerated emphasis placed on National Historic Landmark properties to the detriment of other historic properties. We believe that the as yet unlisted Yosemite Valley Cultural Landscape District is of national significance, and that all contributing elements to this district should be treated as 'Highly Valued Resources.'" (Non-Governmental Organization, San Francisco, CA - #7885)

"We do not believe that any of the alternatives contained in the Valley Plan establish a compelling reason to remove any historic structures from the Valley. The stone bridges, the superintendent's house, and the apple orchard are examples of structures with a long important cultural history in the Valley. We believe that maintaining these structures will enhance the visitor experience and the cultural historic values of the Park and strongly oppose removal of any of the historic structures in the Valley." (Mariposa County Board of Supervisors, Mariposa, CA - #6060)

CASCADE RESIDENCES

"We are opposed to the planned removal of any of the Cascade Residences that retain their historic integrity. We believe that play a key role in illustrating the historic extent of development in Yosemite Valley, and that their removal would not achieve any significant natural resource goals. Given the significant shortage of employee housing in Yosemite, we believe that park should preserve historic housing wherever possible." (Non-Governmental Organization, San Francisco, CA - #7885)

CURRY VILLAGE

"We are taken aback by the sheer scope of demolition planned for Curry Village. We are concerned that the removal of two thirds of the guest cabins and the introduction on significant new construction will result in a loss of integrity of the historic district and its removal from the National Register. We recognize the need to remove a portion of the cabins, but we believe the numbers being considered are excessive. We also are disappointed by the lack of



commitment to preserve individual structures at Curry Village, including the Tresider House, Mother Curry's Bungalow, and the Huff House. We can see no reason why these structures should not be used as guest accommodations or some other appropriate function." (Non-Governmental Organization, San Francisco, CA - #7885)

Response: The National Park Service is committed to the preservation of cultural resources eligible for listing in the National Register of Historic Places. Certainly the National Historic Landmarks properties merit recognition, as do the various other historic structures and cultural sites within the Valley. The cultural landscape resources of Yosemite Valley are considered a highly valued resource and tend to overlap with other highly valued resources, especially natural resources. The National Park Service would treat all historic properties with the same level of protection whenever possible, as indicated in the revised text of the Preferred Alternative. In addition, the National Park Service Preferred Alternative addresses preservation treatment for all historic structures in the context of the plan, emphasizing adaptive use rather than removal whenever possible.

In a place as complex as Yosemite Valley, there are situations where complete protection and preservation of every single resource type is impossible. It is the policy of the National Park Service to ensure that management processes for making decisions and setting priorities integrate information about cultural resources, and provide for consultation and collaboration with outside entities. The National Park Service continues to do this through such studies as the Yosemite Valley Cultural Landscape Determination of Eligibility and hydrologic studies related to all bridges (including the historic bridges) spanning the Merced River. The National Park Service is engaged in ongoing consultation with park-associated American Indian tribes, and other federal agencies, the public, and special interest groups.

In response to public comment and consultations with other state and federal agencies, the National Park Service has revised the Preferred Alternative for the *Final Yosemite Valley Plan/SEIS*. For example, Superintendent's House (Residence 1) would be relocated to the Yosemite Village Historic District housing area and would be adapted to another use. The historic structures at the National Park Service maintenance area would be considered for rehabilitation and adaptive reuse, based on final decisions regarding in-Valley shuttle technology and other needs. The Cascades residences, which are no longer needed for park housing in that location, would be considered for relocation to El Portal and adaptive reuse. Curry Village would be rehabilitated, with the objective of maintaining the integrity of the National Register historic district while continuing to provide a rustic tent cabin visitor experience. Individual historic structures, such as Mother Curry Bungalow, Tressider House, Stoneman House, and the administrative buildings would be rehabilitated.

529. Public Concern: The *Yosemite Valley Plan* should clarify what components shape the Yosemite Valley Cultural Landscape District.

"The lack of adequate graphic representation of cultural resources is of particular importance with regard to the cultural landscape. Cultural landscapes are a relatively new concept to park planning and one with which the general public is largely unfamiliar. Some effort needs to be made to graphically represent to the public the scale and contributing elements of the Yosemite Valley Cultural Landscape District. This is especially critical because the Determination of Eligibility for the district is still in draft form and has not been made available to the public, so we have no documentation regarding the Park's assumptions as to which resources are contributing and which are non-contributing." (Non-Governmental Organization, San Francisco, CA - #7885)

Response: As with other resource topics, there is no specific graphic presentation of the proposed Yosemite Valley Cultural Landscape Historic District. These resources have been combined with other highly valued park resources to form the composite highly valued resources plate. However, the plates (see Vol. IC) depicting the alternatives distinguish between the landscape contributing structures and the noncontributing resources. Information regarding the proposed historic district, including the Draft Determination of Eligibility, is available for review in the park's Research Library. In addition, there is a

detailed discussion of these resources in the *Final Yosemite Valley Plan/SEIS*, Vol. IA, Chapter 3, Affected Environment.

266. Public Concern: The *Yosemite Valley Plan* should retain Curry Orchard.

“Historic Curry Orchard: The orchards are a distinct hands-on historical experience for visitors. When I lived in Yosemite it was a yearly volunteer event for scout and other groups to harvest the apples and press them for juice. This can become a renewed social and historical event with visitors invited to participate. I do not suggest that the orchards be maintained for better yield. (This applies to all three orchards.)” (Individual, Seattle, WA - #1354)

Response: The National Park Service considers the remaining fruit orchards historically important as evidence of the early homesteading period in Yosemite Valley. All three remaining orchards date from the late 19th century and may also have horticultural significance. Because fruit trees are not especially long-lived, and have not been maintained, most of the individual trees are in poor condition. Therefore, the National Park Service is proposing propagation to preserve genetic material. Still, the remaining orchards in the Valley present challenging issues for park management. Paramount is the fact that the orchards attract bears, which in turn pose threats to visitors and tend to create unfavorable behavior in bear populations.

Considering all of these factors, the National Park Service has decided to preserve genetic material from the Curry Village orchard but remove the trees and restore the area to open meadow. The park would retain the Lamon and Hutchings orchards for educational and interpretative purposes. The decision to remove Curry Orchard was based on three factors: (1) the number of reported bear incidents, (2) the poor condition of remaining trees (after 50 years of serving as a parking lot for Curry Village), and (3) the benefit to cultural and natural resources in restoring the area to meadow.

260. Public Concern: The *Yosemite Valley Plan* should retain the Superintendent’s residence in Yosemite Valley.

“I think it’s ridiculous that the superintendent’s home is going to be razed; I don’t think there’s any excuse for that.” (Individual, Alameda, CA - #20019)

“As the plan rightly points out, removal of the Superintendent’s House and garage would have a major adverse impact to the individual property and to the Valley-wide cultural landscape. The Superintendent’s House is a key part of the history of Yosemite Valley and a critical component of the cultural landscape. The National Trust strongly believes that this key structure must be preserved. We recognize that the building stands in important oak woodland habitat. However, the footprint of the structures is very small, as is the total loss of habitat due to the presence of the house. Certainly the gain of a few thousand square feet of habitat would not compensate for the loss of such a key historic structure.” (Non-Governmental Organization, San Francisco, CA - #7885)

MOVE AND CONVERT INTO A GROUP GATHERING AREA

“Move this historic building [Superintendent’s House] to the end of the historic row houses in Yosemite Village to serve as residence or perhaps a small group gathering area. Re-landscape the footprint to service as a picnic and small group gathering area, including weddings of 50 people or less.” (Individual, Lafayette, CA - #4499)

Response: The Superintendent’s House (Residence 1) is indeed an important historic structure and a contributing element in both the Yosemite Village National Register Historic District and the Yosemite Valley cultural landscape. However, it is situated within the 100-year floodplain. Because of the broad *General Management Plan* goal of allowing natural processes to prevail and the objective of removing facilities from the active floodplain, the Superintendent’s House (Residence 1) would be removed. Since it is an important historic structure, it would be relocated to the Yosemite Village Historic District residential area in lieu of demolition. It would then be rehabilitated and adaptively reused for a function that is compatible with the Historic District.



755. Public Concern: The *Yosemite Valley Plan* should recognize Camp 4 as a highly valued cultural resource.

“This plan clearly acknowledges the historical importance of climbing in Yosemite, and the validity of climbing as an ongoing recreational activity in the Park. It also acknowledges the historical importance of Camp 4 to the world climbing community, and the need to preserve and protect it from encroachment. We laud the continued efforts by the National Park Service (NPS) to ensure that Camp 4 is nominated for placement in the National Register of Historic Places. We are especially pleased that Secretary of the Interior Bruce Babbitt, in announcing this plan, recognized that ‘Yosemite is the birthplace, the sacred shrine of the American school of rock climbing and mountaineering.’ Camp 4 really is an important piece of the Valley.” (Recreational Organization, No Address - #7025)

“We are pleased that the Park Planners have recognized the great historic importance of Camp 4. We believe that the Park’s preferred alternative can be achieved without major adverse impacts on the historic site as long as changes are minimized and new development is compatibly designed. It is important that the site be well-interpreted, that its historic name be re-instituted.” (Non-Governmental Organization, San Francisco, CA - #8925)

Response: The National Park Service recognizes the historical significance of Camp 4 (Sunnyside Campground), considered a historic property by the *Final Yosemite Valley Plan/SEIS*. The National Park Service is currently in the process of preparing a nomination for the National Register of Historic Places. Additional campsites proposed at Camp 4 (Sunnyside Campground) would be designed to be compatible with the historic “core” of the camp, thereby retaining the historic integrity of the site.

595. Public Concern: The *Yosemite Valley Plan* should retain historic corridors for nonmotorized use.

“We believe that, to the extent possible, historic corridors should be maintained as bicycle, pedestrian, and bridal paths. These paths should attempt to maintain the historic character of the road where appropriate. We are not opposed, however, to the removal of elevated berms where such berms interfere with the natural flow of high water.” (Non-Governmental Organization, San Francisco, CA - #8925)

Response: The majority of the historic circulation routes in Yosemite Valley would be retained for continued visitor use. However, in some places contributing circulation elements of the Yosemite Valley Cultural Landscape would be either removed or rehabilitated to allow for natural surface water flows. In these cases, the National Park Service would document the historic resource prior to modification or removal.

449. Public Concern: The National Park Service should consider reuse of historic structures slated for removal.

“CPF (California Preservation Foundation) is extremely concerned that adaptive reuse alternatives are not adequately presented and evaluated as an alternative to destroying historic structures. There are many such adaptive reuse alternatives and they should be presented and considered thoroughly in the Draft Plan and DSEIS, in particular relative to places for proposed new uses or as new sites for uses that are proposed to be removed from other areas of the Valley.” (Non-Governmental Organization, Oakland, CA - #7530)

“We are disappointed that very little effort is made to mitigate adverse effects contemplated in the various alternative[s] beyond the minimum standard mitigation measures called for in the Programmatic Agreement. Recordation of destroyed resources does not lessen the intensity of impact on the resource and can by no stretch of the imagination be conceived of as a preservation treatment. While a few scholars will benefit from this sort of documentation, the typical visitor will never realize what resources have been lost. We find the assertion that salvage of materials and interpretation of the former site of a structure such as the Superintendent’s House lessens the impact from major to moderate to be absurd. Rather than relying on recordation, we would instead like to see more effort made to explore options such as rehabilitation adaptive use, or even relocation where no prudent alternative exists.” (Non-Governmental Organization, San Francisco, CA - #7885)

“The NPS Maintenance Area is an area of major concern for the National Trust, and we are opposed to plans to demolish up to thirteen historic buildings. While most of these buildings are utilitarian in nature and design, they illustrate an important part of the Yosemite story. Many of them, especially the NPS Operations Building (Fort Yosemite) are architecturally distinguished structures. We are frustrated by the fact, as elsewhere in the Valley, historic structures here have been targeted for removal, while nearby modern structures that intrude on the landscape are staying. . . Even if it is ultimately determined that emergency services could not be located in the maintenance area, we are convinced that appropriate reuses can be found for many if not all buildings. This may require moving a few structures, or even selective demolition, but there is no doubt that creative planners can find ways to adaptively use these buildings. We believe that a fresh look should be given to possible reuses for the site, including use by the Valley transportation system. Countless historic buildings around the world have been successfully adapted for new uses. Certainly the Park Service has the skill to adapt these relatively flexible historic structures.” (Non-Governmental Organization, San Francisco, CA - #7885)

Response: In response to public comment, additional consideration has been given to the rehabilitation and adaptive reuse of historic structures in the Preferred Alternative in the *Final Yosemite Valley Plan/SEIS*. The National Park Service would relocate Superintendent’s House (Residence 1) to the Yosemite Village Historic District housing area and rehabilitate the structure for adaptive reuse. The final assessment of facility needs and design for the current National Park Service maintenance area has not yet been completed. Part of these needs would depend on the technology used for the in-Valley shuttles. However, in the Preferred Alternative, the National Park Service commits to examining the feasibility of rehabilitating and adaptively reusing the historic structures in this complex, including the NPS Operations building (Fort Yosemite). Other historic structures, such as those at the concessioner stable, would be considered for relocation to other park areas as an alternative to their demolition.

The National Park Service methodology for quantifying impacts in terms of both the National Environmental Policy Act and the National Historic Preservation Act is presented in Vol. IB, Chapter 4. The implementing regulations for the National Environmental Policy Act require agencies to estimate the intensities of impacts to the human environment, as well as the resultant intensity based on the implementation of mitigation measures.

46. Public Concern: The *Yosemite Valley Plan* should require the removal of orchards in Yosemite Valley.

“I recommend removal of fruit trees soon from the orchards. They are only a bit more compatible with Yosemite than the sheep and cattle that once grazed there. Under Alt. 2 the trees will eventually die and require removal anyway.” (Individual, Pioneer, CA - #94)

“The Curry Orchard, as well as the Lamon Orchard, should be removed immediately they attract bears who then move on to the campgrounds. There are tens of thousand of decaying old orchards in this country.” (Individual, Oberlin, OH - #580)

Response: The orchards in Yosemite Valley have been identified as significant to the cultural landscape of the Valley. The National Park Service is striving to balance protection and preservation of these historic resources with the goal of restoring natural processes. The Programmatic Agreement between the National Park Service and the California Office of Historic Preservation (among others) requires careful evaluation of these features prior to any changes in current management efforts. The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* proposes removal of Curry Orchard, neither removal nor cultivation of Hutchings Orchard, and retention and management of the trees in Lamon Orchard until they die. Lamon Orchard has the greatest level of historic integrity as well as the most unique fruit varieties in the park. The National Park Service is in the process of identifying the significance of all historic orchards within its jurisdiction. In anticipation of the report’s findings, Yosemite National Park has evaluated the significance of the Valley orchards and of individual trees within these orchards and is attempting to retain the more rare varieties through a genetic conservation program outside the park. Lamon and



Hutchings Orchards would be interpreted through wayside exhibits, would be allowed to decline over time, and the areas would eventually be restored to a mixture of meadow and riparian vegetation (Lamon) or California black oak woodland (Hutchings) habitats.

316. Public Concern: The *Yosemite Valley Plan* should require the removal of Le Conte Memorial Lodge from Yosemite Valley.

“I wouldn’t mind seeing the National Historic Landmark, the Le Conte Memorial Lodge, removed from the Valley. It is not located on its original historic site and is in the potential rock fall area.” (Individual, Torrance, CA - #4227)

Response: The LeConte Memorial Lodge is a designated National Historic Landmark and a highly valued resource of the Yosemite Valley. The structure, built in 1903 at the base of the cliffs below Glacier Point by architect John White, is exemplary of a specific design style unique in Yosemite Valley. The building was moved in 1919 to a similar setting further west. This new site has acquired significance in its own right and is within the National Historic Landmark boundary for the structure. It is National Park Service policy to protect and preserve the cultural resources that contribute to the history and legacy of the built environment in Yosemite Valley. The National Park Service is also required, under the National Historic Preservation Act, to protect National Historic Landmarks to the maximum extent possible. While the National Park Service would actively remove essential (emergency) and hazardous uses from the rockfall zone, existing facilities that are nonessential may remain (see Vol. II, Appendix C, Yosemite Valley Geologic Hazards Guidelines).

4.9.2.a ~ Historic Bridges

Balancing the cultural value of the Valley’s historic bridges with the ecological health of the Merced River drainage was a contentious aspect of the *Draft Yosemite Valley Plan/SEIS* for innumerable respondents. (See Section 4.13.4 ~ Bridges, for transportation-related concerns regarding Yosemite Valley bridges.) While some people assert that structures impeding the Merced River must be removed, most individuals and organizations urge the National Park Service to retain bridges within the Valley or move them to other meaningful locations. Pronouncing that the Merced River is a rare natural resource but bridges are expendable, one individual advises park leadership to pursue alternative preservation techniques for these structures. “A few photos in the visitor center are all we need to memorialize them,” this person suggests. Presenting a contrary opinion, numerous respondents stress the utilitarian, scenic, and cultural value of Yosemite Valley’s bridges as justification for retention. The specific bridges proposed for removal vary among alternatives and this inconsistency proves that elimination is an arbitrary rather than necessary decision, one individual concludes. Other people advocating retention demand that the National Park System publish evidence to support adverse riparian impact claims. Seeking to introduce compromise proposals, several individuals and organizations proffer possible actions to mitigate bridge impacts on the Merced River or relocate these notable resources to a suitable environment. “After all arguments from engineers opposed to the removal of the bridges have been considered and abandoned,” one person remarks, “I would urge the park service to dismantle the bridges then remove and reuse them.” A Yosemite-area business suggests Mariposa may be an appropriate site for bridge relocation.

686. Public Concern: The *Yosemite Valley Plan* should remove historic bridges that impede the flow of the Merced River.

“Similarly the so-called historic bridges are nothing to write home about; a few photos in the visitor center are all we need to memorialize them; if they are impeding the river flow then demolish them and put up new ones in different

spots that won't impede the river. The river is the rare and worthwhile item, the bridges are expendable!" (Individual, Palo Alto, CA - #4397)

Response: Many of the bridges in Yosemite Valley exemplify the National Park Service Rustic Architectural Style and are an important component of the park's physical history. They provide access across the river and are constructed to visually harmonize with the spectacular scenery of Yosemite Valley. They are listed in the National Register of Historic Places and are considered to be Outstandingly Remarkable Values of the Merced Wild and Scenic River. Therefore, the decision to remove any of these historic resources is a difficult one. The bridges were evaluated using two primary factors: the extent to which they degrade the hydrology of the river, and their continued use as important components of the traffic circulation system. The *Final Yosemite Valley Plan/SEIS* Preferred Alternative proposes removal of Sugar Pine Bridge and associated riverbank revetments, restoration of the riparian corridor, and evaluation of the continuing hydrologic impacts at Stoneman Bridge. If Stoneman Bridge continues to cause unacceptable damage to the river system, this bridge would then be removed.

Note: One response is provided for concerns #12 and #753, and is placed following concern #753.

12. Public Concern: The *Yosemite Valley Plan* should retain historic bridges in Yosemite Valley.

"I join many of my constituents in objection to the removal of the Sugar Pine, Stoneman and Housekeeping bridges from Yosemite Valley. As I mentioned to you in our meeting, I believe very strongly that these bridges are an important and valued historical attribute of Yosemite National Park and that all efforts should be made to preserve them as part of any future management of Yosemite Valley." (U.S. Representative, Washington, DC - #4292)

"I am opposed to the removal of historic bridges, particularly Stoneman and Sugar Pine Bridges. These stone bridges are truly a work of art. I believe these stone bridges are in keeping with the natural setting and do not detract from the visitor's experience. These bridges also can serve a continuing useful purpose if used for pedestrian and bicycle paths." (Individual, CA - #234)

"While Yosemite Valley and Yosemite National Park are first and foremost monuments of natural beauty, emphasis of this point should not exclude, nor even override, the degree to which the Valley and Park have also developed historical importance, particularly as regards historic structures. To that end, I object to those elements of each of the action alternatives which indicate the removal of historic bridges. The fact that the particular bridges to be removed vary from alternative to alternative appears to underscore the arbitrary and non-necessary nature of such removals." (Individual, Mill Valley, CA - #223)

"I suggest that you leave the bridges, all of them. They are historical. Those bridges were built in an era of despair and hunger. They also were built as a work of art and one that has lasted regardless of the elements that have tested their every strength. They represent the era of this nation when people were hungry with much desire to work. . . It would be a disgrace for the government now to destroy those bridges." (Individual, Lodi, CA - #2318)

PROVIDE PROOF OF DETRIMENTAL EFFECTS TO THE MERCED RIVER

"It is very bewildering that if a bridge has been determined to adversely affect the flow of the Merced River, then all Alternatives should address that problem; remove, rebuild or relocate. We, therefore, object to the removal of any bridge unless absolutely proven that it is detrimental to the river, and that issue has never been publicly shown to be true. They have historical value and beauty." (Individual, Granada Hills, CA - #124)

MITIGATE BRIDGE IMPACTS ON THE MERCED RIVER

"The bridges afford important access benefits to disabled visitors, to hikers of limited ability who wish to make short 'loops,' and to bicyclists who are furthering the SEIS goals by helping to reduce automobile congestion in the Valley. If saving these historic resources can be reconciled with a stronger riparian management strategy, I would endorse a blended alternative that accomplished this while repairing flood-damaged facilities. For example, can



levees and channeling be altered to allow the river to meander around the bridges, thereby reducing upstream erosion and helping to restore certain surrounding meadows outside the campgrounds?” (Individual, Berkeley, CA - #4784)

Response: See response following concern #753 below.

753. Public Concern: The National Park Service should consider moving historic bridges and rebuilding with the same materials.

“I find the removal of these bridges to be incompatible with being stewards of the Park. Since I have no hydrology background I cannot argue the engineering methods utilized for this alternative. I can, however, argue the historic implications. These bridges are on the National Register of Historic Places. This designation is not one that comes lightly, as the Park Service well knows. If, after all arguments from engineers opposed to the removal of the bridges have been considered and abandoned, I would urge the Park Service to dismantle the bridges then remove and reuse them.” (Individual, San Luis Obispo, CA - #5328)

“Any new bridges in the Valley should recycle the original stones of the bridges removed to accommodate the flow of the Merced. Please keep in mind that it enhances (and encourages) the pedestrian experience when people (including children) are able to stand on the bridge and see over the parapet. Everyone visiting the valley should have the experience of watching the water ouzels!” (Individual, Beverly Hills, CA - #3556)

Response: The historic bridges are regarded by the National Park Service as important components of the cultural landscape. Eight of the bridges (those that embody a rustic, stone veneered appearance) are listed on the National Register of Historic Places. National Park Service policy and federal preservation law require agencies to carefully consider the value of historic properties when undertaking planning that might adversely affect these resources. Hydrologic studies, available in the Yosemite Research Library, indicate that several bridges are having an adverse impact on the natural flow of the Merced River. While it may be feasible to retrofit some bridges to minimize the negative impacts on the river hydrology, in many cases these retrofits would likely destroy the historic and architectural integrity of the bridge, without fully accomplishing the goal of restoring natural processes. In order to meet goals of natural restoration and yet preserve a significant representation of this cultural resource, the Preferred Alternative proposes to remove bridges and adjacent human-made bank reinforcements (such as riprap) in a phased approach. The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* proposes to initially remove one of the historic bridges, Sugar Pine Bridge, which is causing the most significant ecological degradation. Stoneman Bridge would be removed next, but only if monitoring indicates it continues to cause unacceptable impacts to the river’s natural hydrologic flow. Other historic bridges, such as the Ahwahnee Bridge, will remain under the Preferred Alternative. When the difficult choice is made to remove a bridge, mitigating measures, as outlined in the 1999 Yosemite Programmatic Agreement, would be implemented. These measures include Historic American Buildings Survey/Historic American Engineering Record documentation as a historical record of the resources, salvaging historic materials, and interpretation.

This response also applies to concern #12.

399. Public Concern: The National Park Service should relocate historic Yosemite Valley bridges to Mariposa.

“We understand the NPS need to remove several historic bridges in order to restore the Merced River to a more natural flow, but why destroy them? Mariposa has a plan to landscape the creek running through town and the bridges (at least one of them) would provide a beautiful centerpiece to that effort. Ashland, Oregon, has a lovely creek through its downtown that famed landscape architect Frederick Law Olmstead designed. Could Stoneman Bridge or another of Yosemite’s scenic and historic bridges be relocated to Mariposa for a downtown park and river walk? Would the Federal government be willing to assist in saving one of its historic bridges while also helping to renew an historic town once home to Charles Fremont, western explorer, military hero and U.S. Senator? The preservation of one of these bridges could help revitalize downtown Mariposa and attract visitors, families and photographers.” (Business, Yosemite National Park, CA - #3962)

Response: This concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan*. When a historic bridge is removed, all reasonable options concerning the final disposition of the materials should be explored. Reconstruction of the bridge at a site outside of the park could be one option and an analysis would need to be performed, including logistical and economic feasibility of such an action. The National Park Service is not considering moving or relocating any of the historic bridges within the park. This would seriously degrade their integrity as historic structures and would eliminate their significance as historic properties. Also, if a historic bridge is relocated outside of Yosemite National Park, it must be recognized that there would be a diminishing of the historic integrity of the bridge due to the change of setting.

4.9.3 ~ American Indian Cultural Resources

How the *Yosemite Valley Plan* should address the American Indian legacy of, and continued presence within, Yosemite National Park concerns several respondents. Potential construction of an American Indian Cultural Center is particularly divisive. Some individuals contend that an American Indian center would constitute unequal treatment for all of the cultural groups who have contributed to the uniqueness of the park. Others encourage the National Park Service to not only build such a cultural center but also guarantee the involvement of American Indian tribes from the east and west slopes of the Sierra Nevada Range. Also concerned with management for American Indian cultural resources, a conservation organization calls upon the National Park Service to justify the El Portal housing project's impact upon American Indian occupation sites. The same organization recommends that the National Park Service grant free entrance to all tribal members participating in ceremonial activities or gathering spiritual resources within Yosemite National Park boundaries.

Note: One response is provided for concerns #437, #398, and #470, and is placed following concern #470.

437. Public Concern: The National Park Service should remove the Indian Cultural Center from Yosemite Valley.

"The Indian Cultural Center should be removed from the Valley. There is nothing fundamental about Indian development of prior centuries that should give it special protection over more recent development. Everything becomes historical eventually. It should be treated equally." (Individual, Arroyo Grande, CA - #3555)

"The construction of a new Indian Cultural Center also seems strange, in view of the vast number of older facilities you would like to remove from the park or a mountain man park. This is not basically an Indian park, any more than it is a pioneer park or a mountain man park. If you wish to build such a center, it could easily be constructed away from the valley floor. It seems ludicrous to clear land and build a new facility on the one hand, while destroying a plethora of cultural sites and landmarks on the other." (Individual, Long Beach, CA - #5644)

Response: See response following concern #470 below.

398. Public Concern: The National Park Service should establish an Indian Cultural Center.

"Establish an Indian Cultural Center." (Conservation Organization, Camarillo, CA - #2627)

Response: See response following concern #470 below.



470. Public Concern: The National Park Service should coordinate establishment of an Indian Cultural Center with all tribes adjoining Yosemite National Park.

“In establishing the Indian Cultural Center, please work with tribes from the east side of the Sierra. The tribes from both the west and east sides used the Park, engaged in trade with each other, and intermarried. The proposed cultural center will be most Park visitors’ only exposure to the Park’s pre-history and it should represent all of the prehistoric users.” (Town of Mammoth Lakes, Mammoth Lakes, CA - #7014)

Response: Yosemite Valley is culturally important to several American Indian groups. The establishment of an Indian Cultural Center at the site of the last Native American village in Yosemite Valley was originally proposed in the 1980 *General Management Plan* and is an important element of the current Cooperative Agreement that has been negotiated between the National Park Service and the American Indian Council of Mariposa County (Southern Sierra Miwok). This agreement states the responsibilities for both the National Park Service and the Southern Sierra Miwok for the development of the center and for the tribe’s management of the center. This agreement will be fulfilled regardless of completion of the *Final Yosemite Valley Plan/SEIS*. Recognizing these facts, construction of the Indian Cultural Center, after completion of further environmental compliance, is now only a part of Alternative 1, and not any of the Action Alternatives (see Vol. IA, Chapter 2, Alternatives, and Vol. II, Appendix H, Cumulative Impact Scenario). These facilities would not replace either exhibits in the Yosemite Museum or the demonstration village behind the museum. The National Park Service recognizes that it has a special relationship with all Yosemite-associated Indian groups and will continue to consult and enter into agreements on a government to government basis with these groups. The National Park Service, through applicable federal laws, regulations, specific management policies, and Director’s Orders recognize the special legal rights these groups have as sovereign governments.

This response also applies to concerns #437 and #398.

445. Public Concern: The National Park Service should address the impacts of the *Yosemite Valley Plan* on American Indian Culture in Yosemite Valley.

“In describing the proposed housing facility project in El Portal, Valley Planners indicated the construction, ‘would destroy a large portion of historic village area. The portions of this historic village site that are known to contain human burials would be protected from development.’ Meanwhile, planners propose to follow the necessary steps involved in working with local Indian tribes, regulators and preservation organizations. However, the end result will be construction of this housing, and ‘the intensity of adverse impacts would be reduced from major to minor.’” (Conservation Organization, Malibu, CA - #7880)

Response: The reduction in intensity of impact is an estimate of the effectiveness of mitigation that would be negotiated between the park and tribes. Mitigation would likely consist of delineation and protection of the known burial areas; protection of sensitive and significant archeological features; archeological data recovery and site interpretation; and designation of alternative gathering areas. The National Park Service will continue to consult with the park-associated American Indian tribes regarding mitigation appropriate for undertakings such as housing construction in El Portal.

446. Public Concern: The National Park Service should offer American Indians free entry to Yosemite National Park to conduct traditional activities.

“In October 1997, an agreement was formed between the National Park Service for Yosemite National Park and the American Indian Council of Mariposa County, Inc. for Conducting Traditional Activities. This agreement permits members of the Miwok Indian tribe to gather spiritually significant traditional plants. For this opportunity, the Indians are required to pay the \$20.00 entrance fee at the gates each time they come into the Park. While a small number have passes to gain entry for spiritual purposes, most do not. Others who work for the Park have window stickers that they can use to gain entry. However, many of these Indians live on extremely low incomes, and cannot afford to visit the area of their ancestral heritage. This practice of gate fees for the Indians should cease immediately,

and all persons with Indian heritage should be allowed free entry to the Park.” (Conservation Organization, Malibu, CA - #7880)

Response: This concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan*. American Indians culturally associated with park lands and resources are not required to pay entrance fees for park access for traditional and ceremonial purposes. The National Park Service will continue to work with park-associated tribes to devise a culturally appropriate mechanism for park access.



Section 4.10 ~ Special Land Designations

This section includes comments on special land designations, in particular the management of the Merced Wild and Scenic River is covered here.

The Merced River has shaped the natural and cultural history of the Yosemite Valley for thousands of years and occupies a prominent place in the minds of many Yosemite National Park visitors. Concerns about the Merced River's management have influenced Park Service policy and prompted the preparation of the *Merced River Plan/FEIS*. The National Park Service's dual mandate to simultaneously protect the resource and provide for visitor experience is difficult to implement in the case of the Merced where the park service must abide by federal law, their own dictates, and answer to a large body of oftentimes conflicting public sentiment.

Comments submitted on the *Draft Yosemite Valley Plan/SEIS* include a number of points that are more directly applicable to the *Merced River Plan/FEIS*. This is likely the result of individuals' inability or unwillingness to distinguish between the two planning efforts. While some people clearly did not realize that Yosemite Valley planning and Merced River planning are occurring under the auspices of two different, but interrelated efforts, a large number of respondents feel that the *Merced River Plan/FEIS* must be the cornerstone upon which all other efforts rest. In the words of one person, "The Merced River was, is and always will be the heart and soul of the Valley. . . To move ahead with Valley planning without fully studying and understanding the Merced River is to move ahead with seriously flawed and incomplete information on the key foundational element of the Valley." (Concerns related to Merced River planning are included within this chapter if they were raised during the comment period for the *Yosemite Valley Plan*. Chapter 5 of this volume presents public concerns about Yosemite Valley planning that were identified during the analysis of public comments on the *Draft Merced River Wild and Scenic River Plan/EIS*. These concerns were considered along with public comment on the *Draft Yosemite Valley Plan/SEIS*. For a complete account of the analysis of public comment on the *Draft Merced River Plan/EIS* see summary of Public Comment, Yosemite National Park, *Merced River Plan* (USFS 2000). For a complete discussion of public involvement for the *Draft Yosemite Valley Plan/SEIS* see the *Final Merced River Plan/FEIS*, especially Appendix I, Summary of Public Comments and Responses).

Constituents generally agree that the natural qualities of the Merced Wild and Scenic River should be conserved, but they differ on precisely what actions should be taken to protect the river. A variety of park users believe that measures should be taken to restore the hydrology, stream banks, and ecology of this unique river system. "I strongly support," one person states, "the plans to restore habitats and natural systems [of the Merced River]."

The Wild and Scenic Rivers Act specifies that Outstandingly Remarkable Values should be identified for qualifying rivers and steps taken to ensure that these values are protected. A number of respondents offer suggestions on how these values should be stewarded and what qualities are identified as outstandingly remarkable. The *Yosemite Valley Plan*, one individual argues, must not adversely affect any of the identified Outstandingly Remarkable Values for the Merced River. Furthermore, this person argues that the final plan should describe what limits will be placed on activities to ensure that the river's Outstandingly Remarkable Values are not compromised. Another person warns that the Park Service should not prioritize recreational values of areas to the detriment of other outstanding values. Respondents cite the potential loss

of water quality and wetlands near El Portal and request the identification of additional Outstandingly Remarkable Values to protect these resources.

Within the *Merced River Plan/FEIS*, the National Park Service proposes to implement a 150 foot River Protection Overlay that would restrict development directly adjacent to the river. Public reaction regarding this management designation is mixed; with individuals calling for both more and less stringent river buffers. Since Outstandingly Remarkable Values exist well beyond the hundred and fifty foot buffer, one person would like to see the river overlay extended. In agreement with this belief, another respondent cites research done in the Sierras on buffer widths. “A 150 foot wide corridor is inadequate. . . 600 feet is generally considered adequate,” this person contends. In contrast to those arguing for an extended River Protection Overlay, other respondents feel that an overlay is not necessary or should not be applied to sites where impacts to the river are minimal and the river is a primary part of visitor’s experience.

A few people comment negatively on the National Park Service’s plan to divide the park into various management zones; they feel that zoning will ultimately be ineffective in determining where use occurs.

723. The *Yosemite Valley Plan* should ensure that the Merced River and its banks are restored.

“The plans for the Merced River sound great. The riparian area of the river through the Valley has suffered mightily from human impact over the years. Removing facilities and doing serious restoration work, including re-vegetation, is certainly appropriate and needed.” (Individual, Camp Sherman, OR - #1801)

“It is important to reduce the ‘human footprint’ in the Valley by removing unneeded structures and facilities. We need to restore habitat and natural areas throughout the Valley, especially in the Merced River corridor, to increase visitors appreciation and to enhance the natural qualities of the Park.” (Conservation Organization, Bakersfield, CA - #737)

“I strongly support the plans to restore habitats and natural systems. It is particularly important to restore the critical meadow and river habitat along the Merced. Bridges and other structures that hinder the flow of the Merced or damage hydrologic features should be relocated or removed.” (Individual, El Paso, TX - #617)

Response: The two primary purposes for Yosemite National Park in the 1864 act, as described in Vol. IA, Chapter 1, Purpose and Need, are to preserve the resources that contribute to Yosemite’s splendor and uniqueness, and make the varied resources of Yosemite available to people for their enjoyment, education, and recreation, now and in the future. All alternatives presented in the *Final Yosemite Valley Plan/SEIS* seek to accommodate visitor use and enjoyment and protection and preservation of the cultural and natural resources that make up Yosemite National Park. The National Park Service is focused on protecting and restoring an ecological system that is sustainable over time within the framework of visitor use. An emphasis has been placed on removing facilities from critical habitats, thus reconnecting and reducing fragmentation of these areas and providing for river protection and restoration and function of natural processes. The *Final Yosemite Valley Plan/SEIS* proposes removing many facilities from and restoring the bank of the Merced River, such as Sugar Pine and other bridges, the former Upper and Lower River campgrounds, several sections of roadway, and a large portion of Housekeeping Camp.

The *Merced River Plan/FEIS* established management zoning for all areas within the river corridor, a River Protection Overlay for areas 100-150 feet from ordinary high water on each side of the river, and an adaptive management approach that includes monitoring for visitor experience and resource protection over time. These tools will enable the National Park Service to manage the river corridor to prevent degradation of resources, and in many instances, to enhance and facilitate restoration of resources.



The *Yosemite Valley Plan* has been prepared in accordance with the *1980 General Management Plan*, the Wild and Scenic Rivers Act, and other applicable legislation and planning or policy documents. These National Park Service plans, legislation, and policies promote an emphasis on the “natural” character of the Yosemite landscape, even in more developed areas such as Yosemite Valley, so that accommodating visitors will enhance their experience while not spoiling the landscape. What the National Park Service strives to achieve in terms of visitor experience is always within the context of leaving the land “unimpaired for the enjoyment of future generations.”

724. The *Yosemite Valley Plan* should ensure that projects resulting from the plan do not unduly affect the river’s Outstandingly Remarkable Values.

“The DVP should specify the activities that are proposed to protect and enhance the Outstandingly Remarkable Values for which the river was designated. The DVP should also describe the limits, which are placed on activities that may be proposed in projects stemming from the DVP, necessary to protect and enhance these values, consistent with a valid River plan.” (Conservation Organization, Yosemite, CA - #7883)

Response: The action alternatives in the *Final Yosemite Valley Plan/SEIS* are consistent with the guidance provided by the management elements of the *Merced River Plan/FEIS*. The Merced Wild and Scenic River section in Vol. IB, Chapter 4, Environmental Consequences, in the *Final Yosemite Valley Plan/SEIS*, analyzes the consistency of the alternatives with the *Merced River Plan/FEIS*, including impacts to Outstandingly Remarkable Values, compatibility with segment classifications, and consistency with the management zoning and the River Protection Overlay. Individual actions can have beneficial impacts on certain Outstandingly Remarkable Values and adverse impacts on other Outstandingly Remarkable Values. As stated in the Impact Methodologies and Assumptions section of Chapter 4, Environmental Consequences:

“It is not atypical for Outstandingly Remarkable Values to be in conflict with each other, where an action (or the existing condition) has beneficial impacts with regard to one Outstandingly Remarkable Value and adverse impacts with regard to a different Outstandingly Remarkable Value. The *Merced River Plan/FEIS* recognizes this situation, and in the section on Criteria and Considerations (Chapter II, page 3) states: ‘Actions must protect the Outstandingly Remarkable Values, regardless of where the Outstandingly Remarkable Value is located. When Outstandingly Remarkable Values lie within the boundary of the Wild and Scenic River, the Outstandingly Remarkable Value must be protected and enhanced. When Outstandingly Remarkable Values are in conflict with each other, the net effect to Outstandingly Remarkable Values must be beneficial.’ ”

In addition, the National Park Service’s compliance processes have been modified to ensure that projects comply with the management elements of the *Merced River Plan/FEIS* (see Appendix B of the *Merced River Plan/FEIS*).

535. Public Concern: The *Yosemite Valley Plan* should not give preferential treatment to recreational Outstandingly Remarkable Values.

“The DVP gives preferential treatment to recreational ORVs and concludes that development including lodging, parking lots and roads will enhance and/or protect the recreational ORVs. . . An adverse impact to the biologic, hydrologic or scenic ORVs cannot be traded for improved recreational ORVs as a justification for roadways and lodging.” (Conservation Organization, Yosemite, CA - #7883)

Response: Actions proposed in the *Final Yosemite Valley Plan/SEIS* carefully follow the guidance of the *Merced River Plan/FEIS* and the Wild and Scenic Rivers Act. The *Yosemite Valley Plan* goal, to “promote visitor understanding and enjoyment,” is very similar to the *Merced River Plan* goal to “provide diverse river-related recreational and educational experiences.” Both plans call for preserving a diversity of visitor opportunities in the river corridor and the design and placement of access and recreational facilities appropriate to the preservation of other values. Neither plan calls for the improvement of

recreational values at the expense of other park values or resources. The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* protects this access and diversity of visitor experience by proposing opportunities for solitude and quiet in much of the Valley and proposing opportunities for overnight accommodations and social activities in other areas. However, as reflected in Chapter 4, Environmental Consequences, the *Final Yosemite Valley Plan/SEIS* does not give preferential treatment to the recreational Outstandingly Remarkable Values (ORVs) to the detriment of other ORVs. The preferred alternative in the final plan (Alternative 2) would allow the National Park Service to protect and enhance each of the ORVs in those segments of the river affected by actions in the *Final Yosemite Valley Plan/SEIS*.

540. Public Concern: The National Park Service should recognize water quality as a Merced River Outstandingly Remarkable Value.

“Water quality was not included as an ORV and should be because increased runoff, soil erosion and non-point source pollution from increased development, human activity and traffic may significantly impact the current water quality.” (Conservation Organization, Yosemite, CA - #7883)

Response: This concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan*. The *Merced River Plan/FEIS* has already established the Outstandingly Remarkable Values for the Merced Wild and Scenic River. Water quality is part of the hydrologic Outstandingly Remarkable Value in the wilderness segments of the Merced River. Water quality is not an Outstandingly Remarkable Value in Yosemite Valley, El Portal, or Wawona because the existing water quality in these river segments is not outstanding in a national or regional context. Runoff from developed areas and human contact with water are two factors that impact water quality. The *Final Yosemite Valley Plan/SEIS* does not propose to reconsider the Outstandingly Remarkable Values established by the *Merced River Plan/FEIS*.

Impacts to water quality, both beneficial and adverse, resulting from actions included in the *Final Yosemite Valley Plan/SEIS* are evaluated in Vol. IB, Chapter 4, Environmental Consequences, Water Resources.

541. Public Concern: The National Park Service should identify wetland Outstandingly Remarkable Values along the El Portal section of Merced River.

“Wetland ORVs were not identified along the El Portal section of the Merced WSR; given the dire warnings of SNEP regarding wetlands in this elevation, the exclusion of wetlands as an ORV in this reach is wrong. The Sand Pit area functions ecologically as a wetland (and should be designated for restoration not redevelopment). Wetland also exists behind the Hotel, the El Portal Market, the Keiwick Construction Company Trailer/office, and around the Odgers gas station/headquarters. These areas are already highly impacted with point-source pollution. . . habitat fragmentation from development and trampling, and non-native plant populations. Instead of being proposed for redevelopment, they should be proposed for restoration.” (Conservation Organization, Yosemite, CA - #7883)

Response: This concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan*. Outstandingly Remarkable Values for the Merced Wild and Scenic River were established in the *Merced River Plan/FEIS*. River-related wetlands are considered part of the biological resource Outstandingly Remarkable Values throughout the Merced River corridor, including El Portal. Examples of river-related wetlands in El Portal include the aquatic environment and riparian zones of the Merced River and El Portal oxbow. The *Final Yosemite Valley Plan/SEIS* does not propose to reconsider the Outstandingly Remarkable Values established by the *Merced River Plan/FEIS*.

The *Merced River Plan/FEIS* zones the Sand Pit in El Portal as Day Use, and allows for its existing use as a construction staging area to continue indefinitely. However, it cannot be converted to another use.



726. The *Yosemite Valley Plan* should dictate that the river's Outstandingly Remarkable Values are protected well beyond the area of the 150-foot River Protection Overlay Zone.

"Many of the Outstandingly Remarkable Values (ORVs) are found beyond the proposed 150 foot River Protection Overlay zone. This is especially true when the ORV is related to habitat for flora or fauna. The suggestion that ORVs will be protected and enhanced only within the proposed 150 foot buffer is completely unacceptable and is not consistent with the provisions of WSA and its guidelines." (Conservation Organization, Mariposa, CA - # 9224)

Response: The Merced River Plan is a guiding document for the Yosemite Valley Plan. As stated in the Merced River Plan/FEIS in the section on Criteria and Considerations (Chapter II, page 3), and as reprinted in Chapter 1 of the Yosemite Valley Plan:

"Actions must protect the Outstandingly Remarkable Values, regardless of where the Outstandingly Remarkable Values is located. When Outstandingly Remarkable Values lie within the boundary of the Wild and Scenic River, the Outstandingly Remarkable Values must be protected and enhanced. When Outstandingly Remarkable Values are in conflict with each other, the net effect to Outstandingly Remarkable Values must be beneficial."

Thus it is incorrect to state that the *Yosemite Valley Plan* only seeks to protect Outstandingly Remarkable Values within the River Protection Overlay. In keeping with the goals of the *Merced River Plan*, the *Yosemite Valley Plan* protects Outstandingly Remarkable Values wherever they are located. Refer to Chapter 4, Environmental Consequences, for a complete analysis of impacts on Outstandingly Remarkable Values and the Merced Wild and Scenic River.

534. Public Concern: The *Yosemite Valley Plan* should provide riparian buffers based on the best available science.

"The report to Congress by the Sierra Nevada Ecosystem Project (SNEP) describes three areas associated with riparian systems. These are: the community area, the energy area, and the riparian buffer area. These areas are not distinct, but are nested, with the riparian buffer area including the energy and the community areas. According to the best available science related to the Sierra Nevada Range. . . The 150 foot 'River Protection Overlay' will not provide the necessary protection to assure the health of the riparian ecosystem. A 150 foot wide corridor is inadequate as a connector between wildlife populations. The appropriate width is dependent on the species of concern, but 600 feet is generally considered adequate. This is particularly serious given the propensity of the Park management to circumvent review of proposals through the subterfuge of 'Categorical Exemptions.'" (Conservation Organization, Mariposa, CA - #9224)

Response: All action alternatives of the *Final Yosemite Valley Plan/SEIS* include implementation of the River Protection Overlay. The River Protection Overlay protects the river by providing a buffer area for natural flood flows, channel formation, riparian vegetation, and wildlife habitat. These areas allow for the main channel to link with backwater areas, tributaries, and groundwater systems; provide for increased channel diversity; and contribute sources of needed nutrients and woody debris to the river. The River Protection Overlay also protects riverbanks from human-caused impacts and associated erosion and is the area of highest priority for restoration of riparian communities and hydrologic processes. The River Protection Overlay will accomplish these objectives through its limits on facilities. The management framework for the River Protection Overlay provides specific guidance for the replacement, repair, or relocation of existing facilities, the placement of new facilities, and treatment of emergency situations.

The River Protection Overlay above 3,800 feet elevation includes the river channel, the area flooded by normal high water (see definition in Glossary), and 150 feet as measured from normal high water (below 3,800 feet this distance is 100 feet). The determination of the width of the River Protection Overlay was based on the area necessary to maintain natural processes such as flooding, channel

formation (i.e., meandering), the contribution of woody debris and nutrients to the river, and the linkage of the main channel with backwater areas, tributaries, and groundwater systems.

In Yosemite Valley, the Merced River is an alluvial river with shorelines that naturally erode and accrete, resulting in gradual meandering of the river. However, facilities in the river and on the riverbank are causing unnatural erosion and accretion and preventing the river from meandering in places. A primary objective of the River Protection Overlay in Yosemite Valley is to allow the river to meander.

National Park Service staff developed the technical framework for the River Protection Overlay in a series of internal workshops beginning in 1993 and continuing into 1999. Staff reviewed technical studies by various agencies, including the U.S. Forest Service and the U.S. Fish and Wildlife Service. Many of these studies confirmed the importance of ensuring the contribution of inputs to the river from upland vegetation as a guide for setting the width of riparian protection areas.

278. Public Concern: The National Park Service should not adopt a 150 foot-wide protective zone along the Merced River.

“The Merced River does not need to be protected with a 150-foot wide protected zone.” (Individual, No Address - #1551)

Response: This concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan*. (See Vol. IA, Chapter 2, Actions Common to All Action Alternatives.) The River Protection Overlay was established in the *Merced River Plan/FEIS*. The River Protection Overlay serves as a buffer, protecting areas immediately adjacent to the river, which are particularly important to the health and proper functioning of the river ecosystem. The River Protection Overlay is intended to be the location of highest priority for restoration of hydrologic processes and biotic habitats within the river corridor, and nonessential facilities should not be located in the River Protection Overlay.

The River Protection Overlay ensures compliance with the Wild and Scenic Rivers Act to protect the free-flowing condition of the river and the Outstandingly Remarkable Values (see the Wild and Scenic River sections in Chapters III and IV, and Vol. II, Appendix B of this document). Implementation of the River Protection Overlay is an action called for as part of the Preferred Alternative in the *Final Yosemite Valley Plan/SEIS*.

725. The *Yosemite Valley Plan* should not apply the River Protection Overlay to river campsites and housekeeping camp units.

“We do not believe that the River Plan Protection Overlay should be applied to any of the river camp sites. Our experience is that most of the visitors congregate at the sandbar areas anyway. Since there are a very limited number of river sites for campers anyway, this fact in itself limits the number of people entering the water at their campsites. . . We believe that Housekeeping Camp Units should not be removed from the River Protection Overlay. People come to enjoy the river, please do not remove it from access.” (Individual, San Diego, CA - #7309)

Response: The River Protection Overlay was established in the *Merced River Plan/FEIS* to protect areas immediately adjacent to the river. These areas are particularly important to the health and proper functioning of the river ecosystem because they allow the main channel to link with backwater areas, tributaries, and groundwater systems; provide for increased channel diversity; contribute sources of needed nutrients and woody debris to the river; and filter runoff water draining into the river. The River Protection Overlay is intended to protect the Merced River, but it cannot do so if facilities such as campsites and Housekeeping units are immediately adjacent to the river. Accordingly, the *Final Yosemite Valley Plan/SEIS* complies with the guidance of the *Merced River Plan/FEIS* by removing campsites and units at Housekeeping Camp from the River Protection Overlay.



417. Public Concern: The *Yosemite Valley Plan* should not require land management zoning.

“Land Management Zoning: You are intentionally vague on this item, but it sounds to me like fencing or no trespassing to me. You would have to be vague to sell this to the public. I strongly question the need. First, most visitors do not have the time or inclination to go off exploring some of the more sensitive off-site areas of the Valley. Second, if you provide paths to most non-sensitive areas, this is where the visitors will go. A few will always want to go where no one else goes, but will this really harm anything? It has been my experience that as soon as you tell the public they can’t do something they will want to do it. Leave well enough alone.” (Individual, San Marcos, CA - #4584)

Response: The central purpose of land management zoning as proposed in the *Final Yosemite Valley Plan/SEIS* is to ensure that visitor facility, or employee-related impacts, do not degrade important resources in Yosemite Valley. It is not the intent of the National Park Service in proposing land management zoning to exclude visitors from portions of the Valley. Given the level of visitation to Yosemite Valley, it is necessary and important to manage visitor use in such a way as to protect resources and provide a quality visitor experience. This management philosophy is consistent with the mission of the National Park Service as articulated in the Organic Act of 1916.

Section 4.11 ~ Visitor Experience

This section reflects the public's concerns regarding the overall visitor experience in Yosemite National Park. Analysis of public comment is grouped into three subsections: general management direction, access, and recreational activities.

4.11.1 ~ General Management Direction

Several people comment on the overall visitor experience in Yosemite Valley. Numerous people who comment on the *Draft Yosemite Valley Plan/SEIS* suggest that the Park Service clearly define criteria for proposed changes that may affect the overall visitor experience in Yosemite National Park. For instance, the Mariposa County Board of Supervisors advises that the *Final Yosemite Valley Plan/SEIS* “define the visitor experience and its intrinsic relationship to the aesthetic scenic, historic, archaeological, and scientific features or ‘core values’ of Yosemite National Park.” This group also advocates limiting visitor facilities to the “base level of services” by eliminating all unnecessary amenities such as pizza parlors, swimming pools, and bars.

A number of respondents offer recommendations on research methods to measure visitor use of Yosemite National Park. The Mariposa County Board of Supervisors suggests that the National Park Service clearly define the carrying capacity for Yosemite National Park. Studies documenting the maximum visitor use that given areas can sustain, the board proposes, should be conducted prior to planning. The board further asserts that the use of mechanical counters at entrance stations should be reexamined because this method of collecting data does not delineate between visitors and park employees or vendors.

In addition to concerns regarding the park's carrying capacity, several people offer comments on how the National Park Service can control park visitation. A U.S. Representative asserts that the proposed ten-lane traffic check station is inconsistent with the National Park Service goal of limiting west valley development. Additionally, this person believes that a checkpoint may be perceived as a means of monitoring visitation at the expense of visitor experience. One respondent proposes limiting visitation to Yosemite Valley by promoting use of other parks in the Sierras such as Kings Canyon and Sequoia National Park.

383. Public Concern: The National Park Service should define the visitor experience and its intrinsic relationship to the core values of Yosemite National Park.

“Define the visitor experience and its intrinsic relationship to the aesthetic scenic, historic, archaeological, and scientific features or ‘core values’ of Yosemite National Park. Resource-focused opportunities unique to a national park setting, based on resource preservation as opposed to resource exploitation, provide the framework for such a definition (e.g., camping as a resource-based activity that requires minimal permanent infrastructure vs. lodging replete with buildings, paved parking, and a host of guest services requiring additional employees/ housing). Do swimming pools, pizza parlors, bars, equipment sales/rental, etc. contribute to the uniqueness of Yosemite Valley or are they an intrusive ‘fragment of suburbia’? What is the base level of services to be provided in the Valley and what is the base level of employees required?” (Madera County Board of Supervisors, Madera, CA - #4284)

Response: The definition of visitor experience, including its relationship to other park values, is found in the goals and criteria sections of Vol. IA, Chapter 1, Purpose and Need, of the *Final Yosemite Valley Plan/SEIS*. The visitor experience goals and criteria also need to be read in context of the resource management goals and criteria. A fully described “desired visitor experience” cannot be formulated for Yosemite's visitors, because the experience is highly individualized for the several million visitors to the



park each year. But the Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* does include an appropriate balance of preservation, development, and use that would keep Nature's wonders from being overshadowed by the intrusions of the human environment. The Preferred Alternative also would include educational programs that seek to instill a sense of resource stewardship and understanding.

358. Public Concern: The National Park Service should initiate carrying capacity studies for Yosemite National Park.

"Initiate carrying capacity studies that will scientifically document amount of visitor use an area can sustain before negatively impacting resources. Studies should also present a well-defined variety of options that will enable land-use to continue but perhaps under altered circumstances. Such research (though continually monitored) should be conducted first, in preparation for planning—not within five years after a Record of Decision." (Madera County Board of Supervisors, Madera, CA - #4284)

Response: In Vol. IA, Chapter 2, Alternatives, Actions Common to All Action Alternatives—Visitor-Use, the *Final Yosemite Valley Plan/SEIS* discusses the concept of visitor-use levels. The *Yosemite Valley Plan* and the *Merced River Plan/FEIS* have both called for more rigorous implementation of the Visitor Experience and Resource Protection process, which addresses the issue of visitor-use levels by identifying indicators of critical conditions, the standards for those indicators, and a constant monitoring process. If the results of the Visitor Experience and Resource Protection study indicate the need for establishment of a maximum visitation level for Yosemite Valley, supplemental environmental compliance and public involvement would be conducted prior to establishing the use levels.

357. Public Concern: The National Park Service should refine processes for monitoring the number of Yosemite National Park visitors.

"Refine process for collecting statistics at the entry gates. Since a major part of the planning effort appears to be based on annual visitation, it is critical that those numbers be clearly defined. The current method of relying on underground mechanical 'counters' that (when operable) are unable to delineate between visitors, employees, and vendors other than by formula needs to be reexamined for validity." (Madera County Board of Supervisors, Madera, CA - #4284)

Response: The *Final Yosemite Valley Plan/SEIS* has not been prepared in direct response to annual visitation counts. The goals of this document were formulated based on the 1980 *General Management Plan*, when visitation was approximately half of what it is today. The counting system in place is evaluated periodically and adjusted when necessary. The action alternatives of the *Final Yosemite Valley Plan/SEIS* do, however, offer another future opportunity for reexamining this system during the development of the traveler information and traffic management system.

355. Public Concern: The National Park Service should reassess the development of a traffic check station at the entrance to Yosemite Valley.

"The proposed ten lane traffic check station at the entrance to the valley has been dubbed 'Checkpoint Charlie' and compounds the perception that the intention of this plan is to control visitors, rather than enhance the visitor experience. While the purpose of this valley-entrance station is not described in any detail, it implies significant development at the west end of the valley. One of the goals of this plan ought to be to limit west-valley development, and the proposed Checkpoint Charlie violates that goal. The Checkpoint would also contribute to the identified need to add 127 Park Service employees at an annual cost of \$5.45 million. I cannot support such an increase in the Interior Appropriations bill here in Congress for the purposes outlined in this plan, and firmly believe that increased costs for fewer but more regulated public services are not in the national interest." (U.S. Representative, Fresno, CA - #2951)

Response: The check station that was proposed in the *Draft Yosemite Valley Plan/SEIS* at the El Capitan crossover was to be part of a travel information and traffic management system that would be

implemented as part of the *Yosemite Valley Plan*. (See Vol. IA, Chapter 2, Alternatives, Actions Common to All Alternatives.)

If potential incentives and visitor information elements of the traveler information and traffic management system are not successful in keeping the number of vehicles that travel east of El Capitan crossover from exceeding the available parking, and if visitor traffic in the east end of the Valley results in congestion on the roads, a check station would be constructed at the El Capitan crossover, as proposed in the Preferred Alternative of the *Final Yosemite Valley Plan/SEIS*.

The function of the check station proposed at El Capitan crossover would be to manage vehicles entering the eastern portion of the Valley. Vehicles driven by visitors with overnight accommodation reservations as well as vehicles used by day visitors using dedicated parking spaces in the east Valley would be allowed to pass through the station. The station would also manage shuttle and tour bus vehicles as well as administrative traffic entering the Valley. The function of the check station is to improve the ability of park staff to safely manage traffic and inform visitors of the choices they have for travel to the Valley when day-visitor parking is at capacity.

Currently, when the restricted access plan has been implemented, El Capitan crossover has been used as a checkpoint. The existing roadway layout and lack of facilities make the job of traffic control difficult and hazardous for park staff and visitors alike. Because there are not multiple lanes and a convenient means for visitors to turn around, traffic management frequently has been hazardous and inefficient.

The check station would be designed to provide the appropriate means to check vehicles, provide by-pass lanes for shuttles, and to harmonize with the surrounding environment.

378. Public Concern: The *Yosemite Valley Plan* should promote visitation of other Sierra parks.

“We focus so much effort on Yosemite Valley we forget there are many other beautiful locations in Yosemite Park and in the Sierras. Some exploitation of these other areas could well provide the relief sought for Yosemite Valley’s heavy visitation. A marketing and development plan designed to promote other park lands in the Sierras (e.g. Kings Canyon, Sequoia) should be developed. This would include expansion of camping spaces, hotels/cabins, available sewage and electrical utilities, hiking trail development, naturalist write-ups, parking for day usage, Sierra Club write-ups and promotional advertising in magazines such as *Sunset* (this magazine publishes one or two articles a year on Yosemite as a destination/vacation spots). We have been to other Sierra locations yet we have been forced to do our own research about these locations because we have not seen environmental and wildlife reviews, vacation promotions, camping opportunities, or other materials that provide encouragement to visit these beautiful park lands.” (Individual, Irvine, CA - #4288)

Response: It is beyond the scope of the *Yosemite Valley Plan* to promote visitation of other Sierra parks; however, the plan does call for the design and implementation of a Traveler Information and Traffic Management System (see Vol. IA, Chapter 2, Alternatives, Actions Common to All Action Alternatives—Traveler Information and Traffic Management). This system would provide better information to travelers regarding the current conditions in Yosemite and what their options may be regarding alternatives to staying in Yosemite Valley. The system would include all of Yosemite National Park, so people could be directed to park locations outside of Yosemite Valley. An element of the system already proposed in the plan is the location of visitor centers near each park entrance, which could introduce visitors to the variety of resources and stories throughout the entire park. Many people do not realize that Yosemite is much greater than the narrow Yosemite Valley. The system could also offer suggestions for accommodations and camping facilities in the vicinity of the park when all park facilities are full. The design of this system would include extensive public involvement.



4.11.2 ~ Access

The degree to which Yosemite Valley should be accessible to the public is central to many respondents' concerns regarding the *Yosemite Valley Plan*. Section 4.12.2 includes a discussion of general comments concerning equality of access for various user groups. Respondents' myriad concerns relating to access restrictions, access for special user groups, and entrance fees are also detailed in this section.

4.11.2.a ~ General Management Direction

Fervent calls for equal access to Yosemite Valley characterize many respondents' comments on the *Draft Yosemite Valley Plan/SEIS*. Several people believe the draft plan allows access for certain user groups at the expense of other groups. Whether they cite high-cost accommodations or restricted personal vehicle access, some people generally agree that the proposed plan limits opportunities for particular groups to enjoy one of America's "most beautiful national treasures." The young, physically mobile, and affluent visitors are favored over senior citizens, disabled persons, and low-income visitors, these people assert. The National Park Service, several people insist, must maintain Yosemite Valley as an accessible site for all visitors, not a "privileged zone" for the elite.

55. Public Concern: The *Yosemite Valley Plan* should ensure access to Yosemite Valley for all people.

"I believe we should not ruin our parks. However, I don't think they should belong to those who can hike, ride bikes, run and climb. . . Please don't forget those that are handicapped, in their golden years or have physical impairments. We all need to be able to have access to this park—that is what has made it so great!" (Individual, No Address - #192)

"People need access to one of our most beautiful national treasures. Yosemite is a magical place for a child to be when the sun rises on a misty morning. The new plan quite effectively limits the opportunity for young families, seniors and the handicapped to enjoy Yosemite, while bikers and hikers will have full access. Why? What will this do to the public's desire to develop and expand our National Park System? Why should people pay taxes for facilities that they would probably never have an opportunity to enjoy?" (Individual, Moraga, CA - #310)

"This last point deserves emphasis: the preferred alternative, and to a lesser degree all alternatives, appear to favor certain types of uses over others. But the Park must be able to be used by all people. In reading the Draft YVP SEIS I can't help but think of my elderly relatives—and, let's face it, our more out of shape relatives—who may be unwilling or even unable to appreciate the Valley by any more onerous means. While every effort should be made to reduce vehicular traffic in the Valley overall, this should not come at the cost of causing marginalized people to be unable to enter and appreciate all that the Valley has to offer." (Individual, Mill Valley, CA - #223)

"We are concerned that the preferred alternative will impose unnecessary economic sanctions and hardship on 'day-use visitors.' We believe the NPS is discriminating between the poor and the rich. Those who can afford the luxury of the resort style facilities are allowed to drive their cars into the Valley unrestricted. They are given elite status. National Parks were not formed for the elite. They were formed for all Americans with equal right of access." (Individual, Mountain View, CA - #6140)

CONSIDER THE NEEDS OF SENIOR CITIZENS

"It is important that you not overlook the needs of older Americans in your plan. We cannot hike, and prefer riding in the comfort of our own cars to riding and switching busses. We are in favor of more, not less options to view the park from, such as helicopters, rafts, motorized rubber tired trail trains, or horse drawn vehicles etc. We want to appreciate the beauty of the park as much as the younger generation who, it seems, feel they are the only 'owners' of the park system." (Individual, Brentwood, TN - #88)

Response: Visitor accommodations are provided within the larger context of the National Park Service mission and within the particular limiting characteristics of Yosemite Valley (see Vol. IA, Chapter 2, Alternatives, Developing a Range of Alternatives—Development Considerations, and Resource Stewardship—Highly Valued Resources). It is clear that Yosemite Valley cannot accommodate a limitless number of people. But the Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* would accommodate in the Valley’s overnight facilities and day-visitor parking facilities the maximum daily visitation level specified in the 1980 *General Management Plan* (18,241). Additional visitors would be able to enter the park via public transit. The *Final Yosemite Valley Plan/SEIS* would enhance Valley access in other ways: improved information available in advance of a visit; better visitor orientation and information when in the park; and improved access to larger areas of Yosemite Valley by bicycle, walking trails, and shuttle bus.

The National Park Service will comply with the Architectural Barriers Act, the Rehabilitation Act, and the Americans with Disabilities Act in facilities and programs. To this end, the *Yosemite Valley Plan* would require that shuttle buses and other facilities be accessible for visitors with disabilities. Overnight lodging in the Valley would continue to be accessible by personal vehicles or transit buses. Analysis of and planning for accessibility would be conducted throughout the implementation of the *Yosemite Valley Plan*. The phasing schedule for the *Yosemite Valley Plan* would also stipulate that until transit vehicles and facilities are accessible, access for visitors with disabilities would continue essentially the same as now, by the use of personal vehicle placards for access to parking spaces at principal Valley destinations. (Also see response to concern #13.)

234. Public Concern: The National Park Service should create a plan that equitably distributes access to opportunities in Yosemite Valley.

“These plans often are some of the best examples of environmental injustice and environmental racism in the entire American policy process. Please make certain that the Valley Plan equitably creates incentives to redistribute visitors within the Park without creating a privileged zone in this Valley which belongs to us all.” (Individual, Alma, MI - #3110)

Response: The *Final Yosemite Valley Plan/SEIS* has been amended in response to concerns that new lodgings would not provide quality, resource-related experiences and that mostly low-priced accommodations were being affected. The National Park Service is concerned about equitable access to Yosemite Valley and its facilities, programs, and attractions. The accommodations reservation systems do not discriminate on the basis of economic status, race, gender, religion, profession, culture, or sexual orientation, so each person has the same opportunity to secure lodging or camping facilities. The actions proposed in the *Draft Yosemite Valley Plan/SEIS* that reduce facilities in Yosemite Valley did call for the bulk of the reductions to come in the categories of camping and rustic level accommodations. The facilities most affected were those in the rockfall zones and the highly valued resource areas (see Vol. IA, Chapter 2, Developing a Range of Alternatives). The challenge has been to locate an appropriate mix of facilities in those few areas that are suited to development. In the Preferred Alternative, and compared with the *Draft Yosemite Valley Plan/SEIS*, campsites have been increased by about 8%, rustic accommodations by 35%, and economy level accommodations by 12%. In the Preferred Alternative, 81% of all overnight accommodations (camping and lodging) in the Valley would be priced at the economy level or below (compared to 78% of existing accommodations); 53% would be priced at the rustic level or below. The mix of accommodations proposed maintains a range of overnight opportunities, from camping to rustic Housekeeping units to economy, mid-range, and deluxe lodging facilities. The Preferred Alternative of the *Final Yosemite Valley Plan/SEIS* would establish several new campgrounds and the lodging facilities developed would emphasize connection to park resources, economy level cost, and year-round function. Overall, and outside the scope of the *Yosemite Valley Plan*, the National Park Service is developing strategies for reaching and serving a more diverse constituency, particularly through the efforts of interpretive outreach services already underway (including a partnership with the University of California, Merced campus). (Also see response to Concern #55.)



4.11.2.b ~ Access Restrictions

In contrast to advocates of unrestricted access to Yosemite Valley, some people believe that crowded conditions resulting from unrestricted access degrade, rather than enhance, visitors' enjoyment of the Valley. To remedy this perceived overcrowding problem, many respondents offer various suggestions to limit the number of visitors in Yosemite National Park. Specifically, they recommend daily limits on the number of visitors in the park and limits on the number of times people can visit each year. Others, however, argue that crowding in the Valley only occurs during the summer months. Access restrictions should only apply to the peak use period from Memorial Day weekend to Labor Day weekend, they contend.

Several respondents declare that restricting the type of visitors entering the park, rather than the number of visitors, is an appropriate congestion-reducing measure. The National Park Service should only permit access to the park for day users, suggests one citizen. Proposing a different access restriction, several people believe international visitors' access should be limited. If an access quota must be implemented, it should restrict access for those who do not pay United States taxes, according to these respondents.

4. Public Concern: The *Yosemite Valley Plan* should limit the number of people allowed to visit Yosemite National Park.

"I do not see how the 'National Park Experience' can be provided to citizens without limiting the number of persons in a park at any given time. Overcrowding strains the facilities and personnel and degrades the enjoyment of the park. I would suggest a reservation system for lodging, camping, and even entrance that could guarantee that travelers would be able to get in when they arrived. Perhaps something like 75% of the rooms, campsites, and available day use cap would be on reservation with the remainder on a first-come first-serve basis." (Individual, No Address - #30020)

"The best idea is to limit the number of people that access the park! Have every visitor make reservations, and provide a deposit, which will make them serious and confirmed visitors. We already have to make reservations for accommodations in the Park. There's already a limit there. It will not be any additional inconvenience to make reservations to visit the Park." (Individual, No Address - #30208)

"Limit the number of visitors to 1000 per day. Reservation system. All else will sort itself out. Not all who want to go to Yosemite will have access on the date they might wish. So it is with popular rivers, camp sites, museums, etc." (Individual, No Address - #398)

"I think that there should be a capacity of 2,000 people a day that can enter the park. That way there will still be places for animals to roam and live." (Individual, Palo Alto, CA - #843)

LIMIT THE NUMBER OF TIMES PEOPLE CAN VISIT PER YEAR

"For more people to enjoy the park, would it be feasible to set a limit on how many times in a given year that any person/family could visit the park, thereby making space available for others to see it for the first time? We treasure our opportunity to visit Yosemite and will probably not be able to return, but we do hope our children and their families will find space when they are able." (Individual, Hanover, PA - #5556)

LIMIT ACCESS DURING PEAK USE PERIODS

"First of all, I feel that we are making a much larger problem out of the so called crowding in the Valley than really exists. We are trying to make year round solutions to a problem that exists for only a few months of the year. The Valley is crowded from Memorial Day Weekend to Labor Day Weekend. If you go there any other time of the year, there is no crowding, traffic jams, excess people, etc. I think perhaps that there should be some kind of restrictions on use during the period of Memorial Day to Labor Day. Maybe we need to have a lottery system and tell people if they wish to enjoy the Valley during these times they must plan ahead." (Individual, Ceres, CA - #1220)

Response: The *Final Yosemite Valley Plan/SEIS* does not propose specific limits on visitation. While the *General Management Plan* prescribed a maximum daily use (i.e., day and overnight use) level for Yosemite Valley, its analysis was facility- and vehicle-based with no criteria for protection of resources or visitor experience. The *Final Yosemite Valley Plan/SEIS* proposes to complete a Visitor Experience and Resource Protection study within five years of the Record of Decision for the *Final Yosemite Valley Plan/SEIS*. For further information, see Vol. IA, Chapter 2, Alternatives, Visitor Use in Yosemite and Land Management Zoning.

579. Public Concern: The National Park Service should allow only day-use visitor access to Yosemite National Park.

“The stay at the park should be limited to day use only.” (Individual, Albuquerque, NM - #3676)

Response: With increasingly available rapid transportation and the development of recreation, lodging, and camping facilities in gateway communities, visitors are no longer dependent on overnight accommodations (camping and lodging) within Yosemite Valley during a visit to Yosemite National Park. Nonetheless, the National Park Service recognizes that there is great value in being able to experience the Valley in the evening, night, and early morning, and overnight accommodations facilitate this special experience for park visitors.

Target numbers of campsites and lodging units were established through a public process in the 1980 *General Management Plan*. The number of lodging units were further refined in the 1992 *Concession Services Plan*. The *Final Yosemite Valley Plan/SEIS* also proposes to revise the number of campsites and lodging units in an effort to improve the quality of visitor experiences while protecting and preserving resources for future generations. Decisions on the number and type of visitor accommodations must be based on resource and site condition. These conditions include floodplains and geological hazard areas (see Vol. IA, Chapter 2, Alternatives, Developing a Range of Alternatives—Development Considerations), as well as the quality of the overnight experience and how closely it relates to the park and the immediate environment.

190. Public Concern: The *Yosemite Valley Plan* should limit international visitors' access to Yosemite National Park.

“The park is paid for by . . . the taxpayers. Why go to such pains to preserve it if admittance will be so limited to the taxpayers. If you want to limit admittance, then limit the foreigners from admittance. Large numbers of foreign visitors are here at all times. . . Charge the foreigners a hefty fee to enter—they don't pay our taxes.” (Individual, Graham, NC - #113)

Response: This concern is acknowledged; however it is outside the scope of the *Yosemite Valley Plan*. The intent of the *Yosemite Valley Plan* is to ensure that access to Yosemite Valley would be equitable for all potential visitors.

4.11.2.c ~ Special User Groups

Many people who comment on the *Draft Yosemite Valley Plan/SEIS* call attention to the access needs of specific user groups. Most frequently mentioned are the needs of visitors with disabilities and mobility limitations. In order for these needs to be addressed in the plan, several people believe the National Park Service should proactively engage representatives from these user groups in accessibility planning. Furthermore, one person asserts that an Americans with Disabilities Act accessibility plan should be completed before implementation of the plan to ensure compliance with Titles 2 and 3 of the Act.



In addition to suggestions for Yosemite Valley accessibility planning, several respondents ask that the National Park Service clarify how the plan will specifically affect disabled visitors' access to the Valley. In particular, these people want to know if disabled persons will be granted personal vehicle access and if shuttle buses will be wheelchair accessible. Claiming that bus travel is too difficult for many people with disabilities, some respondents recommend that these visitors be permitted to use their personal vehicles in Yosemite Valley. One person believes electric carts would serve disabled visitors well in accessing various scenic areas in the Valley.

Several respondents are concerned with local community members' access to Yosemite National Park. The Mariposa County Unified School District asserts that the final plan must account for the vehicle access needs of official and sanctioned visitors to Yosemite National Park schools. One respondent questions whether Wawona homeowners will continue to have vehicle access to Yosemite Valley.

123. Public Concern: The National Park Service should involve people with disabilities and mobility limitations in accessibility planning for Yosemite Valley.

"Any future analysis and development of Yosemite accessibility plans must have participation of at least two people with disability and mobility limitations. For example, such people might be found among agencies such as the National Center on Accessibility (NCA), the National Organization of Disability (NOD), or similar independent body with expertise in design for accessibility." (Individual, Mariposa, CA - #348)

Response: This concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan*. The *Final Yosemite Valley Plan/SEIS* would call for architectural and programmatic accessibility in the design of new facilities and in retrofitting old facilities, including shuttle buses, visitor centers, comfort stations, and lodging facilities. Specific site designs are beyond the scope of the *Final Yosemite Valley Plan/SEIS*. The Preferred Alternative proposes a full accessibility study and plan during the implementation phases of the *Yosemite Valley Plan*. The National Park Service, through its Accessibility Management Program, works cooperatively with the National Center on Accessibility, and produces guidelines and training on accessibility issues. Ongoing accessibility planning includes the involvement of this organization, accessibility consultants, and appropriate spokespersons for communities of individuals with disabilities.

486. Public Concern: The National Park Service should complete an Americans with Disabilities Act accessibility plan within the *Yosemite Valley Plan*.

"We do not believe that it is appropriate to leave an ADA accessibility plan stated on page 1-10 of the SEIS to a 'future study.' We assert that if the Park Service proceeds with the preferred alternative (or any of the other alternatives that propose demolition of these historic structures and existing paved and non-paved pedestrian and bicycle paths), this action will preclude any effective development of a functional accessibility plan compliant with Titles 2 and 3 of the ADA." (Individual, San Diego, CA - #7884)

Response: Because specific area and facility design is left to subsequent planning efforts, this concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan*. Because implementation of the *Yosemite Valley Plan* would be phased in over a period of years, it is appropriate that specific accessibility needs and plans be developed concurrent with subsequent planning. This is particularly appropriate because natural area recreation accessibility standards have not yet been fully developed. Although it is not possible within the *Final Yosemite Valley Plan/SEIS* to develop those specific elements of an accessibility plan, the document does include a commitment to meeting accessibility guidelines and to providing the most feasible access for visitors with disabilities to structures, features, and programs. The Preferred Alternative also proposes that, until buses are fully accessible, access for people with mobility impairments would temporarily remain similar to present conditions (see Chapter 2,

Alternatives, Visitor Experience—Access for Visitors with Disabilities).
(Also see response to concern #55.)

138. Public Concern: The National Park Service should clarify how the *Yosemite Valley Plan* will affect visitors with disabilities.

“How will those using wheelchairs have access to the Valley with the new plan? In my case I bring my hand cycle/bicycle to ride on the trails in the Valley which I carry on a bike rack on the back of my handicap van. Will I still have access to the Valley in my van? I presume that if we stay in a room at Yosemite Lodge we can drive to the lodge and park there.” (Individual, No Address - #397)

“Just wondering what will happen to the persons that have to use an electric wheelchair or electric scooter to get around on when the plan to restrict the autos in the park arrives. Will the shuttle buses accommodate these people or will we be eliminated from the park? We need our autos to carry the wheelchairs and medical supplies that we use.” (Individual, Sacramento, CA - #30009)

Response: The *Final Yosemite Valley Plan/SEIS* calls for facilities, including shuttle buses, new restroom facilities, visitor centers, and accommodations to be accessible to people with disabilities. Accessibility needs would be further analyzed as implementation of the *Yosemite Valley Plan* goes forward and a specific accessibility plan would be developed. Director's Order No. 42, "Accessibility for Visitors with Disabilities in National Park Service Programs, Facilities and Services," states under §D, Park Facilities:

“Accessibility will be provided consistent with preserving park resources, visitor safety, and providing a high quality visitor experience. In conformance with the regulations and standards, in most instances, the degree of accessibility provided will be proportionately related to the degree of human-made modifications in the area surrounding the facility and to the importance of the facility to people visiting or working in the park. Accordingly, most administrative offices, some visitor overnight accommodations, some employee housing, and most interpretive and visitor service facilities will be accessible to ensure programmatic accessibility. Undeveloped areas, such as those outside the immediate influence of buildings and roads, will not normally be modified, nor will special facilities be provided for the sole purpose of providing access to all segments of the population. Accessibility to facilities in threshold areas will be determined on the basis of the nature of the topography, the significance of the attraction, the amount of physical modifications being made to the environment and the modifications necessary to ensure programmatic accessibility.”

Until the accessible features are in place and as the National Park Service begins phasing in the actions called for in the plan, individuals with disabilities would be able to access the Valley similarly to the present, using reserved parking spaces and placards to allow access to many destinations. Those visitors with lodging in Yosemite Valley would continue to be able to drive and park at their lodging. If Northside Drive is closed to traffic from Yosemite Lodge to Pohono Bridge, that section would not be immediately accessible by automobile or shuttle bus for people with certain disabilities, but the principal destinations at either end (Yosemite Falls, Yosemite Lodge, El Capitan) of this section would continue to be accessible. This section of Yosemite Valley would be specifically addressed in the accessibility study proposed in the plan.

375. Public Concern: The *Yosemite Valley Plan* should allow disabled visitors to use their personal vehicles in Yosemite Valley.

“Disabled people would have difficulty embarking and disembarking the various shuttles while having to carry all their belongings, etc. . . I am disabled, and I cannot travel by bus due to my suppressed immune system and the fact that my legs have to be up and straight while I’m traveling!” (Individual, No Address - #3130)

Response: The action alternatives of the *Final Yosemite Valley Plan/SEIS* do not propose a ban on private vehicles in the Valley. Most overnight visitors and many day visitors would be able to drive their private



vehicles to designated parking areas in Yosemite Valley. Once parked, visitors would be able to travel to destinations in the Valley by shuttle bus. Shuttle buses would be accessible to people with disabilities and would operate frequently throughout the Valley.

Accessibility issues would be studied to determine the safest and most convenient way to improve access to major Valley destinations for visitors with disabilities. Special provisions may be made for those who are unable to use the accessible shuttle bus system. Special provisions could include allowing people with disabilities to travel in private vehicles to some destinations (similar to current management of Happy Isles Loop Road and Mirror Lake Road) or making available electric carts or other special vehicles. (Also see responses to Concerns #486 and #138.)

505. Public Concern: The National Park Service should provide electric carts for the physically challenged in Yosemite Valley.

“In speaking to some of your people up there at the open house, one idea was to . . . have electric carts, like golf carts, where you could drive out to certain places. A concern I have is I like to see and take pictures of various places. I had the opportunity to meet Ansel Adams at one time, and it was a wonderful experience. But he didn’t go to the canned photo stops that we would be limited to if we had a shuttle bus. So, please let’s address the needs of those who are physically challenged.” (Public Hearing, San Jose, CA - #20519)

Response: It is beyond the scope of the *Final Yosemite Valley Plan/SEIS* to prescribe specific means of providing access to those with mobility impairments to facilities, features, and programs. As implementation of the *Yosemite Valley Plan* occurs, accessibility needs would be fully analyzed and an accessibility plan developed to provide the most feasible access for visitors with disabilities. The use of electric carts and similar equipment would be evaluated as part of the development of the accessibility plan.

(Also see response to concern #486.)

433. Public Concern: The *Yosemite Valley Plan* should ensure access to Yosemite National Park schools for official and sanctioned visitors.

“Official visitors to our schools must have vehicular access to, from and around the Park. Sanctioned visitors to our schools must have vehicular access to, from and around the Park.” (Mariposa County Unified School District, Mariposa, CA - #4226)

Response: Specifically how the park is accessed will be determined by the traveler information and traffic management system that would be developed with extensive public involvement following completion of the *Yosemite Valley Plan*. The intent of the *Yosemite Valley Plan* is that access to Yosemite Valley would be equitable for all visitors.

556. Public Concern: The *Yosemite Valley Plan* should clarify whether Wawona homeowners may access Yosemite Valley.

“If you own a home in Wawona, will you be able to drive down into the Valley?” (Individual, No Address - #30008)

Response: Wawona homeowners would be able to access the Valley as would the rest of the public. Specifically how traffic would be managed would be determined by the traveler information and traffic management system which will be developed with public input following the Record of Decision of the *Final Yosemite Valley Plan/SEIS*.

4.11.2.d ~ Park Entrance Fees

Public viewpoints regarding the appropriateness of existing entrance fees to Yosemite National Park vary widely. While some people believe the National Park Service should either maintain or decrease entrance fees to make the Yosemite experience affordable to families of varying economic means, others argue that increased fees are necessary to cover the cost of facility maintenance and other services. Specific management suggestions for entrance fees include a differential fee schedule based on visitation levels, a separate fee for Yosemite Valley access, and different multi-day entrance passes.

Several respondents recommend various fee incentives to reduce automobile traffic in Yosemite Valley: free admission for bicyclists and lower entrance fees for visitors who park their vehicles at out-of-Valley lots.

Note: One response is provided for Concerns #189, #730, #247, and #511, and is placed following #511.

189. Public Concern: The National Park Service should not increase entrance fees to Yosemite National Park.

“Do not raise fees to manage the number of cars coming in. That makes only the lower income people shut out.” (Individual, Folsom, CA - #197)

“I suggest leaving the park fee at \$20. It was a big jump from \$5 not that long ago and again, I’m concerned about keeping it available to everyone. I don’t think money or raising prices is the best way to control congestion. That just continues our nations’ habit of making everything available to those with money and leaving out those who have substantially less.” (Individual, San Jose, CA - #3176)

730. Public Concern: The *Yosemite Valley Plan* should require a decrease in user fees for Yosemite National Park.

“We really appreciate Yosemite as it is and ask that it be maintained as close to possible as it has been. Please keep it available to as many families as possible by lowering the admission fee and camping fees so that all families can afford to come.” (Individual, Eureka, CA - #2352)

“Please lower the entrance fee back to normal prices!” (Individual, Eureka, CA - #2353)

247. Public Concern: The National Park Service should eliminate entrance fees for bicyclists in Yosemite Valley.

“Free bike trails could serve as an incentive to leave cars at remote parking lots or even in the gateway communities. Repeal entrance fees as an economic incentive to reduce automobile traffic in the Park. This will make Yosemite National Park more socially/economically accessible.” (Individual, Mammoth Lakes, CA - #1443)

511. Public Concern: The *Yosemite Valley Plan* should require an increase in entrance fees for Yosemite National Park.

“Impose higher entrance fees to provide the funding necessary to enable the facilities to be improved and properly maintained.” (Individual, Arroyo Grande, CA - #1470)

“Raising the vehicle entry fee to \$20.00 per car was a good idea. I think the fee should be even higher to \$30.00 a vehicle.” (Public Hearing, San Jose, CA - #20537)



“I have no problem with higher user fees to cover a significant portion of the actual cost of services. Low-income people could be waived.” (Individual, Elk Grove, CA - #132)

ESTABLISH HIGHER ENTRANCE FEES FOR PEAK USE PERIODS

“Higher entry prices for peak periods and lower ones for non-peak periods to encourage more evenly distributed attendance figures. \$20 is unbelievably cheap for something as incredible as Yosemite. On crowded days, that price probably does not cover the added costs (need for more law enforcement, emergency personnel, clean up, etc.) that overcrowding brings. Thus, a higher price is easily justified.” (Individual, Torrance, CA - #6421)

Response: This concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan*. Fee policy (amount of fees, through-park fees, etc.) for Yosemite National Park is set by National Park Service headquarters in Washington, D.C., in consultation with the Secretary of Interior, and in accordance with laws and direction from Congress. Yosemite National Park recognizes that fee policy could be considered and evaluated as an incentive for managing traffic and parking. Incentives would be explored in planning of the traveler information and traffic management system, proposed in each of the action alternatives in the *Final Yosemite Valley Plan/SEIS*.
(This response also applies to the previous three Concerns, #189, #730, and #247.)

389. Public Concern: The *Yosemite Valley Plan* should require an additional fee to access Yosemite Valley.

“An additional fee should be charged for access to Yosemite Valley. Such a fee would help limit the crush of day users.” (Individual, Irvine, CA - #4288)

Response: This concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan*. The development of the traveler information and traffic management system would evaluate incentives to provide an enhanced visitor experience.

601. Public Concern: The National Park Service should offer a wide variety of entrance passes to Yosemite National Park.

“Especially if the NPS is going to force more visitors into accommodations outside of various national parks (not only Yosemite, but also at other popular parks such as Yellowstone, Grand Teton, Crater Lake, etc.), it should create a wider variety of visitor tickets or passes than it now has. Currently, the NPS basically offers a one-day (day-use) ticket (for about \$20 per vehicle, at least at Yellowstone) and a seasonal ‘Golden Eagle Passport.’ In addition to these two types of tickets or passes, the NPS should also offer 3-day passes and 5-day passes at appropriate and affordable rates. That way, visitors who cannot obtain their desired accommodations within the most popular National Parks (Yosemite, Yellowstone, Grand Canyon, Glacier, etc.), and must stay outside of these parks, will still be able to experience these facilities in an affordable manner, over a period of several days.” (Individual, Carmichael, CA - #5558)

Response: This concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan*. Present park entrance fees include a \$20 vehicle pass valid for seven days. The need for financial incentives to encourage visitors to park in out-of-Valley locations has not yet been determined and would be considered during the planning process for the traveler information and traffic management system.

523. Public Concern: The *Yosemite Valley Plan* should provide financial incentives for visitors to park at out-of-valley lots.

“The Park service must also create strong financial incentives for visitors to park at satellite lots. The proposed NPS fares have been estimated by Park Service staff in conversation at \$10 per person from Badger Pass, perhaps as low as \$7 per person from El Portal, and \$15 or \$20 from Crane Flat. Since a family of four currently pays \$20 for vehicle entry, any fares above \$5 per person obviously represent a price hike. Our organizations believe that the

Park Service should commit to subsidizing the early stages of the program to keep prices as low as possible and certainly no higher than \$10 per person.” (Conservation Organization, San Francisco, CA - #4594)

“I recommend that users of out-of-valley parking areas be given a lower entrance fee as an incentive in an attempt to reduce individual vehicles taking day trips to the Valley.” (Individual, Sacramento, CA - #5586)

Response: Each of the action alternatives, 2 through 5, prescribes a traveler information and traffic management system that would manage the number of vehicles in Yosemite Valley and, potentially, the park so as not to exceed the capacity of parking areas and roads. From November through March, parking for day visitors to Yosemite Valley is expected to be adequate to meet the demand and no restrictions would be placed on private vehicle access. During the months of higher visitation (April through October), vehicle restrictions, a potential reservation system, or other management measures would be implemented as needed to maintain a balance between parking and roadway capacity and the number of vehicles in the Valley. The need for financial incentives to encourage visitors to park in out-of-Valley locations has not yet been determined and would be considered during the planning process for the traveler information and traffic management system.

4.11.3 ~ Recreational Activities

This section summarizes general concerns regarding recreational activities in Yosemite Valley along with specific concerns relative to rock climbing, rafting, trail use, stock use, other recreational activities, and recreational facilities. People express conflicting opinions on the appropriateness and management of these activities and facilities.

4.11.3.a ~ General Management Direction

Many people visit Yosemite Valley each year to enjoy a variety of recreational activities. However, respondents convey opposing opinions as to what activities are appropriate in the Yosemite Valley environment. One person suggests that the National Park Service establish criteria for determining what activities are suitable within the Valley and limit activities to those that meet these criteria. Another respondent asserts that longstanding recreational facilities such as swimming pools and tennis courts should not be arbitrarily removed from the Valley. Removing these facilities will detract from traditional family experiences in the Valley, this person argues. In contrast, some believe that all recreational facilities and activities that are discordant with the Yosemite Valley environment should be eliminated.

692. Public Concern: The National Park Service should establish guidelines for determining appropriate recreational activities in Yosemite Valley.

“I formulated some criteria to guide us in thinking about what recreational activities are appropriate for one of the ‘nth’ wonders of the world. First, we must ask if the activity is a vital form of transportation in the Valley. Second, we must ask if there is anything unique to doing the activity in the Valley other than being able to have a spectacular background for the activity. Third, we must ask if there is any benefit to the natural environment in doing or providing the activity. Lastly, to prove our point, we can ask if the activity could just as well be performed somewhere else rather than in our very special Valley. When the answers come in no, no, no, and yes in the above order, we can say the recreational activity is not appropriate for Yosemite Valley.” (Individual, Columbia, CA - #7149)

Response: The *Final Yosemite Valley Plan/SEIS* has been developed with the intent of maintaining opportunities for a diversity of resource-based visitor experiences and recreational activities in Yosemite Valley. Although actions are proposed that would affect recreational activities, the *Final Yosemite Valley Plan/SEIS* does not propose to eliminate any, except where actions proposed for other reasons substantially alter the availability of a particular recreational activity (e.g., the proposal to remove the



concessioner stable would eliminate commercial trail rides in Yosemite Valley). However, in the future, management zoning and the results of the Visitor Experience and Resource Protection study proposed in the Preferred Alternative may lead to additional management of some recreational activities when necessary to protect resources or the quality of other visitor experiences. This zoning and the Visitor Experience and Resource Protection study are described in Vol. IA, Chapter 2, Actions Common to All Action Alternatives of the *Final Yosemite Valley Plan/SEIS*.
(Also see response to concern #1061.)

224. Public Concern: The *Yosemite Valley Plan* should retain longstanding recreational facilities in Yosemite Valley.

“Previously, areas needing relief from over-use have been roped off and restricted to allow their ‘return to nature.’ Such remedial action can continue and should be effective where obviously necessary without a more general demolition of existing development. I am sure it’s understood that for years many families have spent their vacations all on the Valley floor. Peremptorily removing various long-existing facilities will detract in myriad ways from this experience. Personally, I have never used the swimming pool, tennis courts, etc., but many have, and who is now arbitrarily to forbid such recreation to energetic families so as to invite instead a meadow or clump of trees?”
(Individual, Sanger, CA - #2293)

Response: The mission of Yosemite National Park is to preserve for today’s and future generations the outstanding natural, cultural, and recreational values inherent in the park resources. The 1980 *General Management Plan*, developed with substantial public involvement, calls for maintaining a diversity of traditional uses to preserve the vitality of the park, particularly those that take advantage of the park’s natural features rather than requiring human-made facilities. As described in Vol. IA, Chapter 2, Alternatives, Developing a Range of Alternatives, the *Final Yosemite Valley Plan/SEIS* proposes to restore highly valued resources, which are those resources making particular contributions to the Valley’s special character. The *Final Yosemite Valley Plan/SEIS* also proposes to remove or relocate facilities from the immediate vicinity of the river in order to restore the natural system related to the river and its hydrology. A third consideration is the removal of visitor and employee facilities from the floodplain and rockfall zones posing the highest hazard to human safety and facility sustainability.
(Also see response to concerns #13, #21, #203, #1005, #1101, and #1102.)

585. Public Concern: The National Park Service should eliminate recreational activities that are incompatible with the Yosemite Valley natural environment.

“Get rid of recreational facilities and discourage activities not in consonance with the geological uniqueness of the Valley such as tennis courts, art activity centers, rafting, fishing, etc. All of these activities can be engaged in elsewhere.” (Individual, Los Altos, CA - #3165)

Response: Yosemite Valley is conducive to and provides a natural and cultural setting appropriate for diverse educational and recreational pursuits, from sightseeing to climbing, and from nature study to artistic pursuits. Desired Yosemite Valley experiences are unique to each individual, and while the narrow Valley cannot accommodate all desires, those activities that do not unduly affect the natural and cultural environment and the recreational pursuit of others can be allowed. Under the *Final Yosemite Valley Plan/SEIS*, the effects of all activities on resources and other visitors would be monitored through the Visitor Experience and Resource Protection program described in Vol. IA, Chapter 2, Alternatives, Actions Common to All Action Alternatives—Visitor Use in Yosemite Valley, of the *Final Yosemite Valley Plan/SEIS*.
(Also see response to concern #1080.)

4.11.3.b ~ Rock Climbing

The appropriateness of rock climbing in Yosemite Valley is a controversial subject for many respondents. Many climbing enthusiasts exhort the National Park Service to recognize rock

climbing as an important traditional activity and address climbers' needs. One way to do this, some say, is to include specific criteria for meeting climbers' needs in the Record of Decision for the *Final Yosemite Valley Plan/SEIS*.

Conversely, other respondents assert that rock climbing is detrimental to the Yosemite Valley environment and should be restricted in areas visible from the Valley floor. According to these people, the presence of rock climbers contributes to the deterioration of vulnerable areas and detracts from the natural view of the Valley landscape. They offer suggestions to remedy these problems such as designating areas outside of the Valley specifically for rock climbing and prohibiting this activity in sensitive natural areas.

688. Public Concern: The National Park Service should emphasize rock climbing as a recreational activity and cultural resource in Yosemite Valley.

"I encourage you [to] continue to recognize the validity of climbing as an ongoing recreational activity and cultural resource in the Park and to sufficiently address the needs of climbers for transportation, parking, and camping in order to maintain the current experience of rock climbing in the Valley. The Park Service should give more focus to rock climbing and the climbing community as a distinct group and a cultural resource of the Valley." (Individual, Alephia, MD - #6959)

Response: Both rock climbing and horse use in Yosemite Valley are recognized as historic uses. The *Final Yosemite Valley Plan/SEIS* analyzes their impacts when relevant to planning issues. In the case of stock use and stables, the impacts on a highly valued resource area, other natural resources, and on trail conditions have been analyzed and determined to be greater than the benefits would warrant. Thus the stables are proposed for removal in the Preferred Alternative. The *Final Yosemite Valley Plan/SEIS* proposes no changes to rock climbing in Yosemite, and rock climbers would have the same access to recreation sites as other visitors (see Vol. IA, Chapter 2, Alternatives, Visitor Experience—Recreation). (Also see responses to concerns #248 and #707.)

707. Public Concern: The *Yosemite Valley Plan* should reflect the needs of rock climbers.

"The Plan should provide some assurance that subsequent plans and systems yet to be developed will fully consider the needs of the climbing community and recognize rock climbing as a distinct activity. The Plan should ensure that designs of surveys and systems will consider rock climbers as a discrete group with unique needs (which have been partially recognized with respect to Camp 4). The Plan allows the Park Service a significant amount of discretion to develop these plans. The final Record of Decision should include criteria and goals to ensure that rock climbing issues will be included in the development of any such subsequent plans and that climbers' needs will be addressed." (Individual, Adelphi, MD - #6959)

Response: Rock climbers are recognized as a user group in the *Final Yosemite Valley Plan/SEIS*, and potential impacts on this group are evaluated. Future park studies, where appropriate, would include climbers among other visitors to Yosemite Valley. Other parkwide and operational plans, such as a climbing plan, are outside the scope of the *Yosemite Valley Plan*.

248. Public Concern: The *Yosemite Valley Plan* should restrict rock climbing in areas visible from the Valley floor.

"One of my extreme peeves is rock climbers! I just don't understand why they are allowed to be on the walls of the 'Most Beautiful Place on Earth.' I know there are arguments about how they do not use the hammered pegs, but I am sure that their tension holds do damage to the structure of the granite walls. Every little pebble that is dislodged, every powdered hand that touches the surface, etc. no matter how seemingly small, all contribute to the deterioration of something that should remain untouched. It is also disturbing to look up and expect to see a gorgeous natural view and see little specks of people on the faces of the rock walls. It is like going on a hike and coming across garbage



that has been left in the wild. Rock climbers are like a disease that is infecting the landscape. There must be a place in the back country that could be designated as a rock climbing area so the well-visited Valley scenes could be left to just love and enjoy from the floor.” (Individual, No Address - #1450)

“Rock climbers are in the process of ruining the El Capitan meadow. The numerous spectators that watch the rock climbers are doing the same thing to the El Capitan meadow that the spectators did to the Stoneman Meadow during the days of the fire fall. There certainly should be something in the Valley Plan to limit the rock climbing activity in Yosemite Valley and the damage it is doing to the beauty of El Capitan and the El Capitan meadow.” (Individual, Coulterville, CA - #3724)

Response: Specific actions to manage rock climbing are outside the scope of this planning effort. Rock climbing and other forms of mountaineering are historical uses in Yosemite and other national parks. When properly managed, the National Park Service believes these are important and valued forms of recreation that allow people to enjoy unique park environments. Impacts to El Capitan Meadow, resulting primarily from those engaged in observing climbers on El Capitan, would be greatly reduced with the implementation of any of the action alternatives in the *Final Yosemite Valley Plan/SEIS*. In the Preferred Alternative the road through Bridalveil Meadow would be evaluated for impacts on the meadow and would be relocated if necessary. At a minimum, parking lanes along the meadow would be removed, and climbing observation would be redirected to the new North American Wall Picnic Area along the old roadbed to the north, which is better able to withstand heavy use.

4.11.3.c ~ Rafting

Rafting is one of the more popular and controversial recreational activities in Yosemite Valley. Many respondents consider rafting an environmentally sensitive and enjoyable way to experience the Valley. Moreover, one person recommends opening more of the Merced River to rafting including the slow stretch below Sentinel Bridge or upstream beyond Ahwahnee Bridge. Others offer specific suggestions for launch and removal sites to limit riverbank deterioration and create a safe rafting experience, for example, establish a take-out area near Sentinel Bridge and relocate the commercial rafting facility from the Curry Ice Rink to the south end of the Lower River Campground.

In contrast, others believe that rafting is detrimental to the river and should be prohibited in Yosemite Valley. For instance, several people argue that raft transport to and from the river leads to riverbank erosion. Furthermore, others point out that raft users pollute the river with manmade objects and waste, require the National Park Service to provide smelly and potentially leaky portable restrooms, obstruct access to the beach for nonrafters, and impair the scenic views of the river and Valley. To remedy these deleterious effects, people suggest relocating rafting operations outside the park.

570. Public Concern: The National Park Service should increase access to the Merced River for rafting.

“As it entails little or no trampling, I consider rafting to be the most effective and eco-sensitive way to experience the beautiful river. It will become increasingly so as riverbank vegetation is restored and trailside vistas across the river become obscure. I strongly recommend opening more of the River to rafting, the slow stretch below Sentinel Beach in particular, but also upstream to or beyond the Ahwahnee Bridge. There should be a non-commercial take-out near El Capitan Bridge, even if this requires some stone steps to control bank erosion at the take-out.” (Individual, Oakland, CA - #3835)

Response: The *Merced River Plan/FEIS* provides guidance in its management zoning for where rafting and rafting facilities might occur. The location of specific rafting areas and facilities would be determined in subsequent operational planning efforts and would consider data from the Visitor Experience and Resource Protection study described in the *Merced River Plan/FEIS* and in the *Final Yosemite Valley*

Plan/SEIS (see Vol. IA, Chapter 2, Alternatives, Actions Common to All Action Alternatives–Visitor Use in Yosemite Valley).

317. Public Concern: The *Yosemite Valley Plan* should designate Merced River put-ins and take-outs.

“I think it would be a great idea if there was a place to launch your rafts and a take-out so that people could do this without messing up the whole River, or River edges . . . There’s really nothing like laying in a raft for two hours looking up the granite walls of the Valley; there’s nothing like it in the world. And I’m really sorry that the last few years that that has not been a possibility.” (Public Hearing, Costa Mesa, CA - #20324)

SENTINEL BRIDGE

“Create a safe place for rafters to get off the river near Sentinel Bridge.” (Individual, Reseda, CA - #4421)

Response: The design and precise location of launch and removal points for nonmotorized watercraft along the Merced River is beyond the scope of the *Yosemite Valley Plan*. Future trail and road design, including shuttle bus turnouts, would be developed as the *Yosemite Valley Plan* is implemented. River access points would have to comply with zoning already provided by the *Merced River Plan/FEIS*, and would need to meet the criteria prescribed by the River Protection Overlay (described in the *Final Yosemite Valley Plan/SEIS* in Vol. IA, Chapter 2, Alternatives, Actions Common to All Action Alternatives).

154. Public Concern: The National Park Service should relocate the commercial river rafting facility to the Lower River Campground area.

“River raft ride: This activity . . . should move from its current location by the Curry Ice Rink, and be relocated to the south end of the Lower River Campground area adjacent to the river, just below the northwest corner of Stoneman Bridge. The problem with the current location is threefold: (1) It is too far from the river, requiring its participants to carry a heavy bulky load too far, (2) participants have to carry the load across a busy traffic intersection, which makes it potentially dangerous and (3) participants have to traverse a dusty, gravelly and therefore slippery downhill slope from the Stoneman Bridge cement walkway to the river bank. People do slide and fall going down this embankment. This proposed new location is immediately adjacent to the river launch area, and has no steep downhill slopes to negotiate. It is, therefore, closer to the river with a safer access. It also will help spread the visitors out and away from the busy Curry area, which is a goal of the GMP.” (Individual, American Canyon, CA - #907)

Response: The Preferred Alternative of the *Final Yosemite Valley Plan/SEIS* proposes relocating the raft rental facility into a consolidated facility for rental of recreational gear at Curry Village. The Lower River Campground area would be returned to natural conditions and be unsuitable for a raft rental facility. Operational improvements, such as transporting rafts to a launch location by the concessioner, are out of the scope of the *Yosemite Valley Plan*. Designating locations of raft launch and removal points along the Merced River is also outside the scope of this planning effort. Such site-specific details would be addressed during future plan implementation activities.
(Also see response to concern #317.)

740. Public Concern: The National Park Service should eliminate rafting from the Merced River corridor.

“Do away with the rafting on the river. This is one activity that leads to the erosion of the banks as they get off and into the River at any desired spot, pulling the raft up behind them. There is plenty of river for rafting outside the Park, west of El Portal.” (Individual, Lodi, CA - #2318)

“I must explain some of my reasons for wanting to eliminate the rafting concession. I recently observed the following negative effects of the rafting concession; trampling of the river bank at the input point, pollution of the



river with manmade objects and waste, crowding of people and trucks to remove rafts at the takeout area, necessity of having smelly, possibly leaky portable restrooms close to the river, and blockage of access to the beach area for non-rafters. In addition, I also object to the presence of so many rafts on the Merced River in that central part of the Valley where the most beautiful views of the river and valley together may be seen. I enjoy the park less because of all the rafting. Perhaps the rafting concession could be moved to El Portal as a solution to any public outcry over ending the concession in the Valley.” (Individual, Columbia, CA - #7149)

Response: The *Final Yosemite Valley Plan/SEIS* recognizes the value in a diversity of recreational activities in Yosemite Valley, including the unique opportunity to experience the Valley’s grand scenery from the perspective of the river. This experience would be enhanced after the River Protection Overlay is implemented and other riverbank restoration processes occur. Visitor Experience and Resource Protection studies and other considerations would also influence future decisions regarding continued management of private and concessioner raft operations. (Also see response to concern #1080.)

4.11.3.d ~ Trail Use

This section focuses on comment regarding the improvement, development, and retention of hiking trails in Yosemite Valley. Several respondents maintain that Yosemite Valley should offer an accessible, safe, and well marked trail system to improve visitor experience. These people offer various suggestions for improving Valley trails: develop a hiking trail system in the West Valley, install safety barriers along specific trail segments such as the Mist Trail to Vernal Falls, and improve signage on trails outside of the immediate Valley.

In addition to trail improvements, several people comment on new trail development in Yosemite Valley. The National Park Service should not build trails for the exclusive use of one user group, a citizen contends. The impacts of pedestrian use near the Merced River are also a concern to some people. To limit these detrimental impacts, one person recommends that permanent walking paths and viewing areas be built along the river.

Addressing the management of existing trails, one person asks that all existing historic trails in the Valley be retained.

142. Public Concern: The National Park Service should improve the hiking trail system in Yosemite Valley.

“To encourage walking rather than auto touring, a hiking trail should be built in the West Valley connecting the Valley Loop Trail and the Pohono Trail. This would be a vital link connecting the Valley floor with the Valley rim. I believe the best location would leave the Valley Loop Trail about 0.2 miles west of Bridalveil Meadow and cross the Wawona Road about 0.3 miles west of the Bridalveil Fall pullout. It would then merge with the old Wawona Road and follow it about 1.3 miles to a point on the Pohono Trail about half way between Tunnel View and Inspiration Point. Another possibility would be to leave the Bridalveil Falls area and link up to the old Wawona Road while remaining always south of the current Wawona Road.” (Individual, Oberlin, OH - #580)

Response: In the Preferred Alternative of the *Final Yosemite Valley Plan/SEIS*, dual trails would be provided throughout the east and mid-Valley. One unpaved trail would be available to pedestrians and stock users, and a second multi-use paved trail would be used by pedestrians and bicyclists. In the Preferred Alternative, trails west of the El Capitan crossover would be limited to the unpaved Valley perimeter trail, because establishing a second multi-use trail would require substantial modification of the natural environment in the narrowest sections of the Valley.

In addition to adding more trails, the Preferred Alternative would improve existing Valley trails and their directional signs along with the realignment of some existing trails. The suggestion for a trail link

between the Valley Loop Trail near Bridalveil Fall and the Pohono Trail would be considered in future trail planning.

67. Public Concern: The National Park Service should ensure safe access to public areas in Yosemite Valley.

“We are worried about the environmental impact at Yosemite and I ask questions and hear a bunch of rhetoric such as ‘there are not ropes or cables there because that distracts from the natural beauty of Yosemite.’ Why is there an iron fence at the top of the falls? Why are there cables to the top of half dome? I am sure these all naturally appeared. Seems more like they were installed for public safety and public access. So, why the rhetoric when inquiring about safety cables on the mist trail to Vernal Falls? Wet granite can be very slippery, one slip is all it takes.” (Individual, No Address - #239)

“I have asked several different rangers and park personnel in Yosemite about logical safety barriers ‘missing’ or wooden ‘fencing’ if you will, along the mist trail from the cut-off of the John Muir Trail along the wet, slippery granite steps heading up to Vernal Falls. Every time I ask that question I’ve been told ‘we realize it’s slippery and risky yet [barriers] would detract from the natural beauty.’ Give me a break. I guess the walk bridge is ‘natural’ as are the iron pipe railings up at the top of Vernal Falls. With a per-car cost increase the last few years from \$5 to \$20, one could expect some kind of safety enhancements such as the one I’ve suggested, or I guess the cables to the top of Half Dome are natural too.” (Individual, Modesto, CA - #4372)

Response: This concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan*. The National Park Service is always conscious of public safety. However, public safety is an operational issue and beyond the scope of this planning effort. The National Park Service would continue to weigh safety “apparatus” against the concepts of aesthetics and resource damage, with an effort to create safe public access without adversely affecting other values (such as visitor experience or scenic beauty).

587. Public Concern: The National Park Service should improve trail signage in Yosemite National Park.

“Find better ways to mark the hiking trails. It’s easy to get lost. . . Blazes need to be put up on trails that are not in the immediate Valley. The establishment of a hiking club could aid in this process.” (Individual, Staunton, VA - #3159)

Response: The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* proposes improvements in trail signage for Yosemite Valley. Trails outside the Valley are outside the scope of this plan but can be considered in future operational and area planning processes. It is a goal of the National Park Service to provide appropriate, useful signs throughout the park.

285. Public Concern: The *Yosemite Valley Plan* should not designate specific trails for the exclusive use by one user group.

“We do not support the construction of any trail for the exclusive use of one user group.” (Recreational Organization, No address - #3701)

Response: Vol. IA, Chapter 2, Alternatives, Visitor Experience—Recreation, describes the trail system proposed in the Preferred Alternatives in the *Final Yosemite Valley Plan/SEIS*. Under the Preferred Alternative, dual trails would be provided throughout the east and middle Valley. One unpaved trail would generally be available to pedestrians and stock users, and the second multi-use paved trail would be used by pedestrians and bicyclists. The one instance where a trail would be used by only one user group—pedestrians—would be a segment at, and east of, the very congested Yosemite Falls area.



54. Public Concern: The *Yosemite Valley Plan* should provide visitor access trails and viewing areas for heavily used sites in Yosemite Valley.

“Given the number of people that visit the Valley I doubt that there is any way that it can be maintained in a pristine manner. I think that perhaps it would be more realistic to address the issue of overuse by providing a walkway along the river that allows people access yet limits the impact. Permanent walking paths and viewing areas with grass or benches could allow the restoration of much of the river and yet provide access to park visitors. Properly designed, these pathways could provide access and are for people to walk, and with proper use of native plants damage to adjacent areas could be minimized.” (Individual, No Address - #30080)

Response: Trails for public access to the river would be included in restoration efforts—in many cases, “hardened” to minimize impacts from trampling. The actions of the *Yosemite Valley Plan* would comply with the zoning provided by the *Merced River Plan/FEIS* when determining where trails and hardened visitor access points would be provided. The *Merced River Plan/FEIS* zoning, however, would limit or, in some cases, preclude trails that would direct people into very sensitive or pristine areas.

286. Public Concern: The *Yosemite Valley Plan* should retain trails used historically in Yosemite Valley.

“All present trails should remain open wherever such use is historic and/or designated, and the use has been significant for an extended time.” (Recreational Organization, No Address - #3704)

Response: As presented in the Preferred Alternative in the *Final Yosemite Valley Plan/SEIS*, most of Yosemite Valley’s trails would remain in their present locations, with some adjustments in areas that will be redeveloped or restored to natural conditions. In addition, new trails would be added. Some trails crossing the river would be relocated or altered when bridges are removed. Bridge removal would be accomplished to restore the free-flowing condition and natural hydrological processes of the river where possible (see Vol. IA, Chapter 2, Alternatives, Natural Resources—Merced River Ecosystem Restoration and Vol. IA, Chapter 1, Purpose and Need, Direction for This Planning Effort—Goals). (See response to concern #57 for a discussion of the Yosemite Valley trail system.)

4.11.3.e ~ Stock Use

The presence of private and commercial stock users and facilities in Yosemite National Park—including stables, staging areas, and horse camps—is a source of contention for many respondents. These people present strong opposing views regarding this activity in the Park.

Supporters of stock use in Yosemite Valley generally believe that with proper planning, stock use will not detrimentally affect fragile areas of the Park. These people maintain that stock use and stock facilities benefit special user populations such as the elderly and physically challenged, maintain history and tradition, and help facilitate key National Park Service operations such as trail maintenance, search and rescue, and law enforcement. In order for people to fully enjoy these benefits, adequate facilities must be available, they argue. Many respondents ask that commercial trail ride operations and the stables be retained for visitor and National Park Service employee use. Simply maintaining the status quo is not enough for other people; they want the National Park Service to provide new amenities such as staging areas and camping facilities.

Other stock use advocates express additional concerns. One recreational organization believes the National Park Service should reconsider developing the proposed loop trail and horse corral. In order to use the loop trail, a stock user must trailer horses or pack animals up to eight hours in each direction, this group asserts. In addition, the proposed unattended corral, this organization indicates, leaves stock vulnerable to predators. One person insists the National Park Service

provide documentation including biological test results to support the claims that facilities impact riparian areas and water quality.

The National Park Service should also recognize the revenue opportunities available from stock users in Yosemite National Park, according to some respondents. The monetary value of the equine industry is grossly underestimated, one individual writes, and the National Park Service can benefit from fees generated for care and recreational use of horses and pack animals in the park.

Several people offer specific suggestions for improving the operational aspects of stock activities in Yosemite National Park: establish a reservation system for horse campsites and staging areas, provide maps to horse camps in the park, create fully operated dude ranch operations, and add overnight mule trips.

In vivid contrast, many oppose stock use in the Valley and recommend establishing stock use restrictions. These people cite various problems associated with stock users: conflicts with other trail users, damage to the environment, and noncompliance of park regulations. To remedy these perceived problems, some respondents offer suggestions for stock use restrictions: restrict equestrian use to off-season periods; disallow construction of the proposed corral and parking area; limit the size of stock user groups; expand the length of the Valley loop trail closed to stock animals; prohibit development of a loop trail at Swinging Bridge; and restrict commercial trail ride operations to areas outside the Valley. One recreational group advocates developing a land ethics program for stock users as another means to reduce environmental degradation in Yosemite Valley.

Rather than only restricting stock use in the park, other respondents urge the National Park Service to completely eliminate this activity. One person claims that stock users and facilities are detrimental to the trail system and offensive to the olfactory senses. Another respondent questions the impact of horse camps on waterways, specifically the Spring Camp at Wawona. This person is concerned that the camp is too close to the riverbank and may affect water quality.

Other people critique the proposed locations for stock use facilities in Yosemite National Park. Curry Village is an undesirable location for stock facilities, some argue, because the large polluting trucks that transport horses would have to enter the Valley. If this site is chosen, one person asks that mandatory site restrictions be established for stock users' vehicles. In addition, the former Curry dumpsite, another respondent asserts, still attracts bears to the area near the proposed stable and may pose a threat to horses stabled there. Relocation of the stable to Foresta is a point of contention for many respondents. Some believe the stable will be detrimental to the environment, safety, and cultural history of the Foresta area given the major road construction and increased daily stock transport that would occur there. At the very least, the National Park Service should better describe the impacts of relocating the stable to Foresta, several suggest.

87. Public Concern: The *Yosemite Valley Plan* should allow stock use in Yosemite National Park.

"I am concerned that horseback riding may be excluded from the Park and that is not right! Yes, there may be some areas that horseback riding should be restricted due to some fragile landscaping, but for the most part horseback riding should not be excluded in the Park! There is room for everyone with responsible planning. Everyone should be able to enjoy horseback riding!" (Individual, Pine Bluff, AR - #105)

"Please consider the aging of America as you make choices about how we will be allowed to enter our public lands. Not all of us can hike anymore. More and more hikers are now hiring packhorses to pack their gear into a base



campsite. I know that equestrians seem a small group for you to pay attention to, but the need for at least pack animals is now growing. Don't shut out or hopelessly restrict people like me just because our bodies have aged. We still love the park and still want to visit as long as we are able. And with a horse, we are still able." (Individual, Coulterville, CA - #66)

ALLOW STOCK USE FOR DISABLED EQUESTRIANS

"A disability as defined by ADA is a 'physical or mental impairment that substantially limits one or more of the major life activities of an individual. To watch the roar of the falls in Yosemite, see the snow-capped peaks of the high Sierras, listen to the wind rustling in the aspens, these are truly a major life activity. To deny disabled horsemen the right to use their horse to access the public trails is clearly a violation of the Americans with Disabilities Act. It is apparent in the Plan that horse access to Yosemite Valley will be nearly eliminated. It is essential that disabled equestrians have a place to park their trailer to unload their horse, a place for their horse to spend the night, and the permission to ride on the trails around the Valley, up to the waterfalls, and out of the Valley. We do not want to see our funds and public funds spent on a lawsuit to enforce our rights. We would rather work with the public agencies to improve the trails, raise funds for outdoor programs, expand horse camps, and raise public awareness. But if we are denied our rights, a lawsuit will be our only recourse." (Non-Governmental Organization, Woodside, CA - #2358)

ALLOW STOCK USE FOR THE TRADITIONAL AND HISTORICAL VALUE

"John Muir and Theodore Roosevelt visited Yosemite on horseback, as did Pershing. From 1890 onward for several score years, the U.S. Cavalry rode from the Presidio in San Francisco to Yosemite to patrol the Valley, every summer. Horses are part of the tradition of the Valley in ways that bicycles, rock climbing, skateboards, etc., even automobiles, will never achieve. It is unthinkable to destroy this historical tradition by not allowing horse camping in the Valley. To eliminate horses from the Valley floor would be to negate one of the stated goals of the NPS: '... to conserve the scenery and natural and historic objects ... and to provide for the enjoyment of the same ...' The article in park handouts, 'Loving Yosemite Valley--Planning Its Future' states that the NPS is charged with '... helping people experience and understand the landscape and histories with which we are inextricably linked.' Horses and humans have a mutual history extending back 7,000 years!" (Individual, Jackson, NJ - #7237)

Response: The National Park Service and concessioner stable operations in Yosemite Valley impact fragile sites and other highly valued resources. Also, commercial trail rides conflict with the heavy pedestrian use on Valley trails. Therefore, the Preferred Alternative of the *Final Yosemite Valley Plan/SEIS* proposes to move stable operations out of Yosemite Valley and to eliminate commercial trail rides. Guided trail rides would still be available from Wawona and Tuolumne Meadows, and stock is used regularly in the wilderness and other sections of the park. The great majority of Yosemite Valley would continue to be accessible by private stock users, and the use of stock would continue to be allowed on Valley stock trails. Stock use on paved trails would continue to be prohibited because of safety concerns.

Regarding stock use as access for visitors with disabilities, much of Yosemite Valley would be accessible by other means (e.g., via paved trails at varying levels of accessibility to meet varied desires for access, shuttle buses equipped to accommodate needs of visitors with disabilities, and parking spaces at principal Valley destinations). Stock use does provide access to wilderness trails for some visitors with disabilities, and the use of private stock for this purpose would continue to be available to day visitors and overnight stock users (who camp or board their stock elsewhere in or outside the park). Day visitor facilities and trailer parking would be available under the Preferred Alternative. Access to trailer parking spaces would be managed through the travelers information and traffic management system. (Also see response to concerns #38, #289, and #86; and concerns #55 and #138 on accessibility.)

217. Public Concern: The *Yosemite Valley Plan* should retain commercial trail ride operations in Yosemite Valley.

"Vol. 1A, Chapter 2, Alternative 2, Summary of Major changes In Relation To Existing Conditions, Remove: '... Concessioner stable ... and 'Commercial trail rides in Yosemite Valley'; and Vol. 1 A, Chapter 2, Table A

Summary of Alternatives, Visitor Experience, Stock Use, Alternative 2: This activity provides resource-based recreation, especially for people physically unable to enjoy Valley views at higher elevations or Valley trail destinations (Nevada Falls, Yosemite Falls, Half Dome, etc.) by walking. Listed in the criteria for accomplishing the goals under 'Visitor Experience,' is to make sure that visitors have equal access for appreciating the Valley's natural beauty. Eliminating this activity conflicts with that criterion. Furthermore, allowing the use of private stock and eliminating rental stock means that only visitors with the money to own and keep private horses may enjoy the Valley this way." (Individual, Livermore, CA - #3091)

Response: In the *Final Yosemite Valley Plan/SEIS*, the Preferred Alternative removes the stable operations and guided trail rides from Yosemite Valley. It has been recognized that extensive stock use on trails in Yosemite Valley has impacts on resources and on the quality of experiences of other visitors that outweigh the benefits due to the relatively few people who take guided rides. The stable operation in Yosemite Valley, necessary to support the rides, has also had impacts on the highly valued resource area intended for restoration in the *Yosemite Valley Plan*. Provisions may still be made for use of stock for those with disabilities, as part of overall accessibility planning proposed in the plan.

86. Public Concern: The *Yosemite Valley Plan* should provide adequate facilities for stock users in Yosemite Valley.

"I question the findings in your plan for Yosemite National Park. There are no horse camping sites planned for the future of YNP. Park goers on horseback need an adequate horse camping site on the Valley floor. Alternatives #2 and 4 allow for five 'parking spaces' of undetermined size, plus a 'corral,' to accommodate day use of equestrians. Alternative 5 relocates the concessionaire stables, with possible visitor boarding. Three alternatives eliminate the stables, and none of the alternatives plan for horse campsites. Equestrians need more room in the staging area for day use -- a minimum of 15 to 25 max, with water. 4 'parking spaces' for day use is non-functional. Remove the corral, and replace it with more and larger parking facilities for rigs (at least 35 feet in length per rig). Horse staging areas must have adjacent campsites for riders. The concept of unattended horses is unacceptable. This has serious safety flaws for the stock as well as liability issues to YNP. Keep the rental stable concession. This provides some stabling for private stock visiting Yosemite. The rent string serves up to 25,000 clients each season. The proposed elimination of this concession denies the elderly, the disabled, and younger children of opportunities to use the trails above the Valley floor. I am in my mid-50's, with bad knees. How else can I enjoy the upper trails if I don't rent a riding horse or trailer in my own? How many visiting horses will be allowed to board at the stables? A loop dirt trail for horses is planned around the Valley floor. I approve of this, but who can use it without adequate staging areas and horse camp sites?" (Individual, Milwaukee, WI - #3360)

RETAIN STABLES

"Keep the stables available for the disabled or elderly visitor. Horses have been used for many years, and provide a way up the trails for those who cannot physically hike that far. I have friends in their eighties who cannot hike anymore, but do well on horseback. They regularly visit trails they could not get to without the benefit of horses or mules. I agree that ponies were unnecessary, but horses and mules can get disabled people where wheelchairs cannot. I used them for my disabled daughter, so she could see Nevada Falls. Horses and hikers need not be in conflict. I believe that to be an excuse for people not familiar with stock animals. Horses play an important role in providing for every kind of visitor." (Individual, Santa Barbara, CA - #85)

"In each of the alternatives for the Valley floor the removal of the stables is called for. This shows a complete and arrogant lack of attention to the historic use of horses in the Park and to the partially mobile population. Many people can go on horseback who cannot hike in the back areas of the Valley. I believe that if you check the reasonable accommodation definitions of the Americans with Disabilities Act you will find that this is an action that can result in legal action if followed through. I believe that an alternative that does not call for the removal of this unique facility needs to be considered." (Individual, No Address - #174)

"Pack and riding stock is used extensively for NPS operations in Yosemite Valley. Trail maintenance in many areas depends upon it entirely. Horses are used in mounted ranger patrols and law enforcement activity, for which the need may be urgent and immediate. Animals may be necessary in search and rescue operation, for which the need may be urgent and immediate. All of these animals need to be cared for and stabled in the area in which they are



used, and not trucked in from a remote location on a daily, or on an irregular basis. The NPS stables should remain operational in the existing location.” (Individual, Los Angeles, CA - #470)

PROVIDE STAGING AREAS

“Here are a few suggestions that equestrians need in the park: . . . Staging areas for off loading and leaving rigs while riding trails.” (Individual, Pine Bluff, AR - #105)

ESTABLISH CAMPING FACILITIES

“The Forest Service provides excellent campgrounds for human and equestrians together, why can’t the NPS? The occasional camper requesting camping places for private stock should be accommodated. We have camped at Wawona with our horses happily, and am glad you are keeping existing sites. We have also used the Valley stables to board our own horses. If you eliminate the Valley stables and don’t add equestrian sites, then you eliminate the best opportunity for the elderly or disabled to get to the nearby backcountry. We generally prefer to camp at Yosemite without the horses, but believe that all people should be accommodated.” (Individual, Santa Barbara, CA - #85)

Response: The National Park Service recognizes the long history of stock in use in Yosemite National Park, and in the Preferred Alternative, provides for continued use of private stock in Yosemite Valley. However, it is also recognized that extensive stock use of heavily used Valley trails causes impacts on resources and the experience of other park visitors (see response to concern #38). Thus, while continuing to support day use of Valley trails by private stock users (with an appropriately designed staging facility and trailer parking managed, like other parking, through the travelers information and traffic management system), the stable and guided stock trips would be eliminated. (Retention of the stable and guided trips is evaluated in Alternative 5.)

Yosemite Valley is highly popular with a large number of park visitors, each desiring individualized experiences. It is not possible to accommodate all of these desires (with the facilities they require) while protecting the highly valued resources that characterize Yosemite Valley’s natural environment. The concession stable would be removed because of its location within a highly valued resource area and the impacts it has on that area in terms of water pollution, erosion, and attraction of non-native cowbirds. The trail rides are being discontinued due to the loss of the stable, the impacts on trails, and the impacts of the experience of other visitors. Similarly, because of the very limited amount of land available for competing facilities, campsites reserved solely for stock users would be an inefficient use of land, and multiple use of these campsites would be unacceptable to non-stock users. However, overnight accommodations for stock would continue to be available in Yosemite National Park. Horse camps are available at Wawona, Bridalveil Campground, Tuolumne Meadows, and Hetch Hetchy (these camps have an occupancy rate of less than 70%), and stables are located at Wawona and Tuolumne Meadows. Combined with staging facilities in Yosemite Valley, these provide opportunities for overnight stays in Yosemite with day excursions in Yosemite Valley.

Approximately 14,000 guided trail trips originate from the Yosemite Valley stable each year, the great majority of which are two-hour rides to Mirror Lake, which is accessible by private vehicle to visitors with disabilities. The accessibility study plan called for in each alternative of the *Final Yosemite Valley Plan/SEIS* would consider the need and feasibility of supplying continued stock access to the Vernal and Nevada Falls corridor for visitors with disabilities. These trips would be coordinated through the relocated concession/National Park Service stables, which would also service park and concessioner operational needs in Yosemite Valley and support programs in the wilderness. (Also see response to concerns #87, #38, and #289.)

422. Public Concern: The National Park Service should reconsider the proposed loop trail and horse corral.

“The proposed loop trail is a plus, but it is almost a waste of time if no provision is made for horse access to that trail. Most riders will have to transport their horses a distance that requires overnight facilities. It is inconceivable that anyone would expect a horseman to trailer his horse 4-8 hours in each direction and have a 6-10 hour ride that makes no sense. To propose daytime parking for 5 rigs of undetermined size, with a corral, is equally inane. The corral is useless as planned. A good horseman would never leave his horse unattended in an area where there is no security. Horses are prey and a confined horse is easy prey for predators. The Draft Plan’s preferred alternative calls for the elimination of the rental stable concession, the only available facility for overnight stay in the Valley.” (Recreational Organization, Clovis, CA - #3568)

Response: The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* provides the minimal facilities necessary for day visitors to Yosemite Valley to use their own stock for touring the Valley or accessing wilderness trails from the Valley. These visitors would continue to have access to horse camps elsewhere in the park.

289. Public Concern: The Yosemite Valley Plan should substantiate claims that horse camps and stables in Yosemite Valley cause undesirable effects.

“Documentation should be provided to support claims that establishing a horse camp in Yosemite Valley would not meet ‘project objectives’ or considerations.’ Statements that the present location of rental stables impacts riparian areas and water quality of runoff should be supported by tests run by environmental biologists. Where are the test results?” (Recreational Organization, No Address - #3701)

Response: It is a goal of the *Yosemite Valley Plan* to preserve the natural processes and cultural heritage of Yosemite Valley while providing a wide range of high quality visitor experiences and opportunities. The long tradition of stock use and its importance to some users is recognized and much consideration has been given to providing opportunities for stock use. Conversely, other visitors have voiced concerns about conflicts with stock on trails and the effects of the presence of stock on the quality of their experience and on natural resources.

The current concessioner stable operation sits directly adjacent to Tenaya Creek, just upstream of its confluence with the Merced River. Land immediately upstream and downstream of the stable has been identified as wetlands in site-specific surveys. Soils in these areas consist of hydric black sandy loam. Small pockets of vegetative cover are characterized by facultative wetland species, including white alder, and obligate wetlands species, such as rushes and sedges. These characteristics, in conjunction with known flood frequencies through the stable area, indicate that the stable is situated on a site that could (and historically did) support riparian vegetation. Most of the stable area is denuded of vegetation, indicating a loss or impact to riparian communities (see Vol. IA, Chapter 3, Affected Environment, in the *Final Yosemite Valley Plan/SEIS*).

The stable also supports a large seasonal population of brown-headed cowbirds that frequent the site because of the high concentration of horse manure that supports the insects on which the cowbirds feed. Various wildlife studies indicate that impacts from nest parasitism by brown-headed cowbirds on bird species that nest in riparian habitats can have severe effects on these species (see Chapter 3, Affected Environment).

The geographic location of the stable directly adjacent to Tenaya Creek and only a few feet above it vertically means this site receives fairly frequent flooding, as well as frequent groundwater inundation of portions of the site during spring runoff. All fecal and urinary wastes on the ground and in the soils are flushed away through either sheet wash or near-surface water flows, carrying these wastes directly into the river system. Due to the lack of wetland and riparian vegetation between the stable and the river's edge, there is little to no ability for nutrient uptake to minimize these massive discharges into the river.



These impacts to the riparian environment (soils, water, vegetation), to the highly valued resources, and to natural river processes support the proposed action to remove the stable from its current location. No horse camps exist in Yosemite Valley, but similar impacts of varying intensity could be expected from these facilities.

741. Public Concern: The National Park Service should recognize the revenue opportunities from stock users in Yosemite National Park.

“I have used our National Park system on horseback in the past and would like to continue to do so into the future. Equestrian use of national parks provides the park with a revenue opportunity that may be overlooked. Do not underestimate the monetary value of horse people in the park.” (Individual, Martinez, CA - #5017)

“Please remember that the equine industry is a major economic force. The horse owning public spends billions of dollars each year for the care and recreational use of their horses. By implementing a park use fee, the economic benefits could be utilized by the National Park Service for the creation, maintenance, and repair of equestrian facilities, thus reducing or limiting the amount of funds for these facilities to come out of the general park fund.” (Individual, Perris, CA - #5675)

Response: This concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan*. Fee policy is set by the National Park Service headquarters in Washington, D.C., under the direction of the Secretary of Interior and Congress. This includes both what fees are charged, and how the revenue can be used.

(Also see response to concern #87.)

288. Public Concern: The *Yosemite Valley Plan* should require a reservation system for horse campsites and staging areas in Yosemite Valley.

“A reservation system for horse campsites and staging areas is essential. Except by special arrangement, two nights stay per rig should be permitted. This would allow the campsites to be more widely available for use by other equestrians.” (Recreational Organization, No Address - #3704)

Response: The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* provides the minimal facilities necessary for day visitors to Yosemite Valley to use their own stock for touring the Valley or accessing wilderness trails from the Valley. These visitors would continue to have access to horse camps elsewhere in the park.

608. Public Concern: The National Park Service should provide maps to horse camps in Yosemite National Park.

“We were unable to find any maps defining Horse Camps. In each instance a Ranger has directed us to them. I am certain no such maps exist.” (Individual, Adelphi, MD - #6959)

Response: This concern is acknowledged; however it is outside the scope of the *Yosemite Valley Plan*.

742. Public Concern: The National Park Service should expand stock use operations in Yosemite National Park.

DUDE RANCHES

“Increase the horse operations to create a privately operated full dude ranch inside the Valley, another on the south ridge and another at one or both of the main redwood groves.” (Individual, Oroville, CA - #4948)

OVERNIGHT MULE RIDES

“Add overnight mule trips.” (Individual, Redding, CA - #2806)

Response: Because of the impacts on fragile areas in Yosemite Valley and the heavy pedestrian use which occurs on Valley trails, guided trail rides would be eliminated in Yosemite Valley and the stable moved under the Preferred Alternative of the *Final Yosemite Valley Plan/SEIS*. The great majority of Yosemite Valley would continue to be accessible by private stock users, and the use of stock would continue to be allowed on Valley stock trails. Stock use on paved trails would continue to be prohibited because of safety concerns. New overnight facilities for stock users in Yosemite Valley are not proposed because of the unavailability of developable land and other facilities that would have to be eliminated to provide them. New facilities outside Yosemite Valley are beyond the scope of this planning effort.

38. Public Concern: The *Yosemite Valley Plan* should restrict stock use in Yosemite Valley.

“I’m opposed to continuing private stock use, as indicated for all but Alternative 3. Horses have no place in Yosemite Valley, even though they may have in the past, when it wasn’t so crowded. They frighten away wildlife, pollute and damage the trails, and create unpleasant odors.” (Individual, Watsonville, CA - #52)

RESTRICT OFF-SEASON STOCK USE

“If you must, you might reduce equestrian use to spring or fall only, so that the busy summer months are avoided. You should continue to provide loop trails for stock use. We already avoid summer visits altogether. The trails existing are fine for stock use at those times, and last visit in early June, we encountered few people on trails at all. If horses are allowed ‘off season,’ then you have no conflicts with hikers because there are very few at all. . . After ski season and before the summer hits, you could have a window of opportunity for equestrians to enjoy Yosemite each year. The fall is another time when the trails are quiet. In this way, you accommodate the largest number of people.” (Individual, Graham, NC - #85)

DO NOT DEVELOP A DAY USE CORRAL AND PARKING AREA

“I have concerns that your preferred alternative will allow for construction of a corral and parking for day use by private stock users in Yosemite Valley. I strongly object to this proposal as it would provide preferential treatment to stock users by allowing them to drive large polluting vehicles into the Valley while others would be required to park their vehicles outside of Yosemite Valley.” (Individual, Mammoth Lakes, CA - #4386)

LIMIT SIZE OF STOCK USER GROUPS

“Having traveled in the back country, I have one more comment. Large horse groups should never be allowed in the Park. Through the years, I have seen trails, meadows and trees devastated by their careless use. They dam up the streams to water their animals and let their dogs go about unleashed. They make powder out of the trails, making hikers walk off the trail. The meadows are left sans vegetation. If this still goes on, you have my vote to ban, ban, ban, these certain ‘selfish elite’ groups.” (Individual, Lodi, CA - #2318)

CLOSE PORTIONS OF THE VALLEY LOOP TRAIL

“There are many things I love about the Valley, and a few things I dislike. One of the latter is the overwhelming presence of commercial stock use. The area around the stables and the trails I have to share with horses is a disgrace. The feces smells horrible, the flies are atrocious, and the dust is ungodly. The plan to close only 1/2 mile of trails to stock animals in the Draft Yosemite Plan is inadequate. This is far too small of a quantity. Considering the impact of stock animal use, this plan needs to do a little more trimming, so that we can enhance the environmental condition in the Valley that will lead to more pleasurable hiking experience by human-powered recreates.” (Individual, Truckee, CA - #3955)



DO NOT CREATE A LOOP TRAIL AT SWINGING BRIDGE

“The HSHA also strongly opposes the creation of a new loop trail for stock users at Swinging Bridge. Again, the majority of the Valley’s unpaved trails should be reserved for the majority of the Park’s visitors - those who travel on foot. It is unfair and unconscionable to allow a privileged minority to substantially degrade the experience of Park visitors by damaging and polluting the lion’s share of the Valley’s unpaved trails.” (Recreational Organization, So. Lake Tahoe, CA - #4431)

ELIMINATE COMMERCIAL TRAIL RIDES

“I approve the elimination of commercial trail rides in the Valley, and removal of the concessionaire stable, as features of Alternatives 2, 3, and 4.” (Individual, Watsonville, CA - #52)

“We strongly oppose the following aspects of Alternative 5: Retaining commercial horse ride operations in the Valley. This service is better provided in the high country, not in the Valley.” (Individual, Santa Barbara, CA - #109)

Response: The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* removes the stable operations and guided trail rides from Yosemite Valley. The National Park Service recognizes that extensive stock use on trails in Yosemite Valley causes impacts on resources and the quality of experiences of other visitors that outweigh the benefits to the relatively few people who take guided rides. The stable operation in Yosemite Valley has also had impacts on the highly valued resource area intended for restoration in the *Yosemite Valley Plan*. The stable is being proposed for removal because of its location within a highly valued resource area and the impacts it has on that area in terms of water quality, erosion, trail degradation, and attraction of non-native cowbirds. As part of overall accessibility planning proposed in the *Final Yosemite Valley Plan/SEIS*, provisions may still be made for use of concession-guided stock trips for those with disabilities. Use of private stock in the Valley is currently at a very low level and continued use would be allowed in the preferred alternative, subject to findings of the Visitor Experience and Resource Protection program outlined in Vol. IA, Chapter 2, Alternatives, Actions Common to All Alternatives Visitor—Use in Yosemite Valley. Day-use visitor facilities would be provided in order to manage impacts from this limited use. Access to the limited trailer parking like other in-Valley parking, would be managed through the traveler information and traffic management system. The Valley Loop Trail would be maintained, for the greatest part, in its historical use as a joint stock and pedestrian trail, except that the heavily visited area near Yosemite Falls and Yosemite Village would be closed to stock use. Instead, stock use would be rerouted across Swinging Bridge to maintain a loop-trip opportunity. The maximum size of stock user groups in wilderness is addressed in the *Wilderness Management Plan*. Elimination of all private stock use is evaluated in Alternative 3. (Also see response to concerns #87, #86, and #289.)

644. Public Concern: The National Park Service should implement a land ethics program for stock users in Yosemite National Park.

“There is no mention of advocating a land ethic for horseback riders. The leave no trace outdoor ethics program teaches and develops practical conservation techniques designed to minimize the ‘impact’ of visitors on the wilderness environment. ‘Impact’ refers to changes visitors create in the backcountry, such as trampling of fragile vegetation or pollution of water sources. The Draft proposes to conduct a series of visitor experience and resource protection studies that would analyze data concerning visitor preferences and impacts to the natural and cultural resources of the Valley. Incorporating the findings of leave no trace, especially those related to backcountry horse usage, would offer an educational opportunity that benefits all Park visitors and ensures that the Park remains open to multiple forms of recreation in a responsible manner.” (Recreational Organization, Silver Spring, MD - #10092)

Response: This concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan*. However, this concern could be addressed in the next revision of the *Resources Management Plan* and the *Wilderness Management Plan*.

567. Public Concern: The National Park Service should eliminate stock use from Yosemite National Park.

“If one day horses and all their attendant trail damage and stench would be eliminated from the trails that would be a dream come true. When finalizing your draft plan please consider eliminating horses from the park along with the trailers, corrals etc. to the greatest extent possible. Horses, as everyone knows, cause a great deal of damage to the trails such as turning them into dust bowls in the summer and drainage ditches in the spring.” (Individual, Santa Rosa, CA - #4774)

Response: Horse use in Yosemite National Park is recognized as a historical and popular activity. It is only within the narrow confines of Yosemite Valley that horse use is being addressed in this plan—horse use parkwide is outside the scope of the *Final Yosemite Valley Plan/SEIS*. (Also see response to concern #38 for specific actions in Yosemite Valley.)

666. Public Concern: The National Park Service should address the impact of stock use on the Yosemite Valley waterways.

“Horses have long been a bone of contention of mine personally in Yosemite. I find the pack trains and horse riding incompatible with hiking, but realize that is my opinion. My issue however, is the ‘camp’ that occurs at Wawona in Spring. This camp is a mere foot or two from the bank of the river! Surely the water quality is affected by this long-term arrangement. What is the arrangement between the Park and these ‘private stock users?’ Do they pay the Park for their use (and abuse) of the trails and waterways?” (Individual, San Luis Obispo, CA - #5328)

Response: The *Final Yosemite Valley Plan/SEIS* discusses the impact of stock use in the water resources sections of Chapter 3, Affected Environment, and Chapter 4, Environmental Consequences. These chapters also discuss stock use in the context of park operations and visitor experience.

The water resources section of Chapter 3, Affected Environment, states that “Recreational activities such as horseback riding, swimming, and hiking can lead to the introduction of organic, physical, and chemical pollutants into the aquatic system. Areas where livestock are concentrated, including the High Sierra Camps, introduce nutrient sources, while the developed areas introduce human waste and debris.” Areas of concentrated livestock use include the concessioner and government stables in Yosemite Valley, the stock trails (especially the Mirror Lake Loop and the John Muir Trail at Happy Isles), and areas of backcountry operations (ranger stations and trail maintenance).

The water resources sections for each alternative of Chapter 4, Environmental Consequences, discusses the impacts, both beneficial and adverse, of changes in stock use in Yosemite Valley. Under the No Action Alternative, “nutrients, turbidity, and Coliform would continue to enter the river from both National Park Service and concessioner stables and would continue to create adverse effects to water quality because of their proximity to storm drains that empty into the Merced River and Tenaya Creek.” Under the action alternatives, “The restoration of areas now occupied by the concessioner stable and the Swinging Bridge Picnic Area would eliminate a source of nutrients, Coliform, turbidity, and other water pollutants from the Merced River. The River Protection Overlay would result in the removal of the development from areas adjacent to the Merced River, thereby creating a long-term beneficial impact to water quality by providing an area for non-point source pollution, such as waste matter from livestock, to be intercepted and degraded prior to entering the Merced River or Tenaya Creek.”

377. Public Concern: The *Yosemite Valley Plan* should prohibit the construction of stock facilities for day visitors near Curry Village.

“The HSHA strongly opposes provisions in the draft plan that would allow for the construction of a new corral and parking area (near Curry Village) for day-use by private horse users. Private stock users should not be allowed to drive into the Valley in large, polluting diesel trucks and trailers when private autos are being increasingly restricted. At a minimum, your plan should include specific and mandatory limits on the size of any facilities for day-use by



stock users, and specify that no stock trucks will be permitted to enter the Valley at any time when private autos are being turned away.” (Recreational Organization, So. Lake Tahoe, CA - #4431)

“Many years after the closure and earth covering of the old dump site, bears still nightly prowl the areas because of the smells and odors which still permeate the area, so sensitive is the nose of a bear. To place a horse/mule stable in a known bear habitat area is unwise. This change should not occur.” (Individual, American Canyon, CA - #907)

Response: It has been determined that private stock day-use is a valid activity and would continue. In addition, the National Park Service and its concessioner have a need to access certain wilderness areas by stock from the Valley. Both of these decisions necessitate a facility from which to operate. The Preferred Alternative calls for the removal of the administrative stable from the Valley and relocating it to McCauley Ranch in Foresta, leaving only a corral facility east of Curry Village in the vicinity of the historic Curry dump to stage administrative stock operations and support limited private day-use stock. This action is pending a wilderness suitability study of the McCauley Ranch area. See Vol. IA, Chapter 2, Alternative 2 for more information.

The entire Valley and park are potential bear habitat. The historic Curry dump area, proposed for construction of the corral, is currently used as an overnight wilderness parking area. This particular site is no more of a bear attractant than other locations within the Valley. Bears that have been conditioned by finding food in vehicles may frequent this area. Visitor education is dramatically reducing the number of human/bear conflicts.

439. Public Concern: The National Park Service should not allow stock facilities in Foresta.

“No stables or horses in Foresta - it would cause too much destruction to the meadows.” (Individual, San Dimas, CA - #3954)

“The Draft Plan’s ‘Summary of Environmental Consequences’ states: ‘The placement of NPS and concessioner stables at McCauley Ranch would have a long-term minor adverse impact in the Foresta area.’ This is an incorrect assessment of the long-term impacts to Foresta. To move approximately 120 head of livestock to and from the Valley and backcountry locations will require major road construction through Foresta, grossly impacting the environment, safety and cultural history of the area. These same major adverse impacts would continue long-term with the daily transportation of stock in and out of Foresta. With increased traffic flow from heavy trucks and other vehicles, I am concerned for my safety and that of my small children. I am equally concerned about the loss of Foresta’s peace and beauty as a result of this plan. I offer three alternatives to this plan, in order of preference: 1. Leave the stables in the Valley where they are centrally located with existing buildings and road access. 2. Relocate the stables to the South Landing area near Crane Flat; road access already exists. 3. Relocate the stables to the Foresta ‘wood yard’ just below the Foresta dumpsters. Though paved road access exists, further development of the area is required, however with far less adverse impact than development of roads through Foresta to McCauley’s Ranch.” (Individual, Yosemite National Park, CA - #7030)

Response: The National Park Service must retain stock facilities in order to accomplish its mission effectively. It has been determined that they are not essential to remain in the Valley and Foresta is the only area identified that will accommodate the use and still retain some relationship to the administrative needs of the National Park Service. The proposed site in Foresta has historically been used for similar operations and was identified as a location for stable operations in the 1980 *General Management Plan*.

106. Public Concern: The *Yosemite Valley Plan* should detail the impacts of relocating the commercial stables to Foresta.

“Since it is proposed [that] the NPS and concessioner administrative stables operations would be relocated to the McCauley Ranch in Foresta it is imperative that the public is given the details regarding this relocation. How will this ‘human built environment’ impact Foresta both socially and environmentally? And more specifically, how

exactly will this new development and stock run-off impact the Crane Creek drainage - an integral part of the biological and recreational environment of the Merced River Canyon?" (Individual, El Portal, CA - #456)

Response: The impacts associated with relocating the stable operations to McCauley Ranch, in the vicinity of Foresta, are addressed in Vol. IB, Chapter 4, Environmental Consequences, of the *Final Yosemite Valley Plan/SEIS*.

4.11.3.f ~ Other Recreational Activities

This subsection focuses on comment regarding miscellaneous recreational activities in Yosemite Valley including motorized recreation, skiing, and hang gliding. Motorized recreational activities, according to one respondent, should be restricted in Yosemite Valley. This person contends that motorized activities such as individual watercraft and snowmobiles are noisy and a safety hazard.

Several respondents offer suggestions to improve the skiing experience in Yosemite National Park: reduced season pass prices, expanded runs and lifts, exemption of Park fees for skiers, and a year-round ski camp at Lyell Glacier.

One respondent insists that hang gliding be banned from the Park because it has "always created unnecessary traffic to Glacier Point."

128. Public Concern: The National Park Service should restrict motorized recreational activities in Yosemite Valley.

"Jet skis and snowmobiles are noisy and a safety hazard. Although each has its own set of problems, they destroy the aesthetics of a quiet, mountain lake and a snowy day. Speed and noise are not assets in national parks. Banning jet skis and greatly reducing snowmobiles (and muffling them) seems like a good idea to me." (Individual, Wooster, OH - #314)

Response: This concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan*. These activities are already prohibited by National Park Service regulations.

640. Public Concern: The National Park Service should encourage the improvement of the downhill ski operation in Yosemite National Park.

"The ski facility is grossly inadequately promoting its use and should be encouraged to utilize the Idaho plan of selling Season Passes for a vastly reduced price. They should also be greatly encouraged to expand their territory with new runs and lifts." (Individual, Oroville, CA - #4948)

Response: Developmental and operational considerations regarding the downhill ski operations at the Badger Pass Ski Area are outside the scope of this planning effort.

322. Public Concern: The *Yosemite Valley Plan* should exempt skiers from paying entry fees to Yosemite National Park.

"A lot of people would like to cross-country ski or use the ski-lift facilities during the winter. There needs to be accommodation for this use without having to pay a \$20 fee to enter the park every time." (Individual, No Address - #3707)

Response: This concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan*. Issues related to entry fees are not being considered in the *Yosemite Valley Plan*.



572. Public Concern: The National Park Service should establish a year-round ski camp at Lyell Glacier.

“I want a massive physical fitness year-round snow ski camp built at Lyell Glacier.” (Individual, Yosemite National Park, CA - #2345)

Response: This concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan*.

584. Public Concern: The National Park Service should prohibit hang gliding in Yosemite Valley.

“I suggest the banning of hang gliding. Hang gliding has always created unnecessary traffic to Glacier Point.” (Individual, Lodi, CA - #2318)

Response: The *Final Yosemite Valley Plan/SEIS* has been developed with the intent of maintaining opportunities for a diversity of resource-based visitor experiences and recreational activities in Yosemite Valley. Although actions are proposed that would affect recreational activities, the *Final Yosemite Valley Plan/SEIS* does not propose to eliminate any, except where actions proposed for other reasons substantially alter the availability of a particular recreational activity (e.g., the proposal to remove the concessioner stable would eliminate commercial trail rides in Yosemite Valley). However, in the future, management zoning and the results of the Visitor Experience and Resource Protection study proposed in the Preferred Alternative may lead to additional management of some recreational activities when necessary to protect resources or the quality of other visitor experiences. This zoning and the Visitor Experience and Resource Protection study are described in Vol. IA, Chapter 2, Actions Common to All Action Alternatives of the *Final Yosemite Valley Plan/SEIS*. (Also see response to concern #1061.)

4.11.3.g ~ Recreational Facilities

Yosemite Valley contains a variety of recreational facilities including picnic areas, tennis courts, golf courses, swimming pools, and ice rinks. This subsection addresses recommendations regarding retaining, removing, or improving these facilities.

Picnicking in Yosemite Valley is an activity enjoyed by many park visitors who make specific recommendations for improving this activity: retain all existing picnic areas in the Valley including the rustic picnic areas and the picnic area at Swinging Bridge; establish new picnic areas at the Upper and Lower River Campgrounds and Curry Orchard; use portable amenities that can be removed during the winter; and establish a computer-based daily permit program to allow for reasonable usage without eliminating any existing facilities.

Many respondents express opposing views regarding the existence of tennis courts, golf courses, swimming pools, and ice rinks in Yosemite Valley. Some believe the tennis courts at the Ahwahnee Hotel should be retained because they are a “low impact, low tech, low visibility, nonpolluting” facility. One person cautions the National Park Service to consider the impacts of removing the tennis courts on the adjacent sequoia trees. Given that removing the concrete slabs may damage the trees’ roots, this individual believes “it does not seem to be worth the risk to tamper with the soil there.” However, some people believe that the tennis courts should be removed because tennis is inconsistent with the Yosemite experience.

While some assert that the public swimming pools in Yosemite Valley prevent river damage and pollution by directing swimmers away from the Merced River, others argue that pollution from the noxious chemicals and demands on the water supply and wastewater disposal systems exceed the degradation caused by river swimming.

The ice rink is another point of contention for several respondents. One person writes that there should be an ice rink in the park but not necessarily in the Valley. Conversely, another person contends that the ice rink at Curry Village should be removed and replaced with cabins. A new ice rink, one person remarks, is incompatible with the Yosemite Valley environment and should not be built.

One conservation organization opposes retaining the Wawona golf course. The biological and scenic impacts of the golf course, this group maintains, should be addressed in the *Final Yosemite Valley Plan/SEIS*.

743. Public Concern: The National Park Service should retain existing picnic facilities in Yosemite Valley.

“All existing picnic areas should remain as being necessary and appropriate for visitor enjoyment of the Valley.” (Individual, Arroyo, CA - #3555)

RUSTIC PICNIC AREAS

“Rustic picnic areas, not just standard tables and benches, should be encouraged, not removed.” (Individual, No Address - #7305)

SWINGING BRIDGE PICNIC AREA

“Swinging Bridge is the most attractive and heavily used of the remaining picnic areas. It frequently hosts large family gatherings, commonly of ethnic minorities. Closing it would further the ‘pogrom,’ add to the demand for dining facilities, and for the workers who serve them.” (Individual, Oakland, CA - #3835)

Response: In the Preferred Alternative of the *Final Yosemite Valley Plan/SEIS*, the Sentinel, Cathedral, and El Capitan Picnic Areas would be retained. However, the present Swinging Bridge and Church Bowl Picnic Areas would be removed in order to restore these areas to natural conditions. The use of private automobiles would be eliminated from the Sentinel, Cathedral, and present El Capitan Picnic Areas to reduce the amount of vehicle traffic in the Valley; shuttle bus service would be extended to serve two of these facilities. A picnic area is proposed near the day-visitor parking and transit facility in the Preferred Alternative, and another new picnic area would be available at the base of El Capitan (see Vol. IA, Chapter 2, Alternatives, Visitor Experience—Recreation.) Informal picnicking would likely become more attractive in areas where motor vehicles were eliminated from Northside Drive (such as the former Upper River and Lower River Campgrounds area and west of Yosemite Lodge).

148. Public Concern: The National Park Service should establish new picnic facilities in Yosemite Valley.

“Two new picnic areas could be established. One would be located in the Upper River campground, so as to be immediately accessible from the new proposed day use parking lot in the Lower River Campground. Portable toilets and picnic tables could be temporarily placed during the peak summer season, and then stored in the winter. The other location should be in the Curry Orchard area, which would be blocked off from any vehicular use. Again, portable toilets and picnic tables could be brought in during the summer peak months and removed during the winter.” (Individual, American Canyon, CA - #907)

CURRY ORCHARD

“I think a picnic area in Curry Orchard would be a good idea and would be extremely well-used. I truly enjoy the Curry Orchard area. I would rather see a picnic area developed in the Curry Orchard rather than at the Yosemite day using parking area.” (Individual, Columbia, CA - #7149)



Response: A new picnic area is proposed near the day-visitor parking and transit facility in the Preferred Alternative, and another new picnic area would be available at the base of El Capitan (see Vol. IA, Chapter 2, Alternatives, Visitor Experience—Recreation). In the Preferred Alternative, the present Swinging Bridge and Church Bowl Picnic Areas would be removed in order to restore these areas to natural conditions. Additionally, the use of private automobiles would be eliminated from the Sentinel, Cathedral, and present El Capitan Picnic Areas to reduce the amount of vehicle traffic in the Valley; shuttle bus service would be extended to serve two of these facilities. Informal picnicking would likely become more attractive in areas where motor vehicles were eliminated from Northside Drive (such as the former Upper River and Lower River Campgrounds area and west of Yosemite Lodge). The Upper and Lower River Campground areas were not considered to be used for formal picnicking, as these areas would be restored to natural conditions.

574. Public Concern: The National Park Service should establish daily permits for use of picnic areas in Yosemite Valley.

“Keep and maintain all existing picnic areas and require a permit to use them on a daily basis, including permission to park at the picnic area. This will give Park authorities ability to allow reasonable picnic area usage without eliminating any of the areas. Computer/LAN support [with] this type of usage permit program should be paramount to avoid making it a burden on the visitor.” (Individual, Los Altos, CA - #3165)

Response: Consideration of a permit process for picnic areas would be out of the scope of this planning effort. Permits could be considered for use of picnic areas, but this would reduce spontaneity of use for most visitors. If the intent of this comment is to use reservations to provide continued access by private vehicles, then the purpose of prohibiting use by automobiles needs to be understood. The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* proposes to reduce traffic volume and congestion by the removal of parking spaces at all Valley destinations except lodging and the day-visitor parking facility. If parking is permitted at other destinations such as picnic areas, back and forth vehicle use would occur, and traffic volume and congestion would increase, contrary to the goals of the *Yosemite Valley Plan*. Picnic areas would remain available for use and two of three present drive-to areas would become accessible by shuttle bus. All present picnic areas, other than Church Bowl and Swinging Bridge, would remain but be evaluated for continued use.

82. Public Concern: The National Park Service should retain the tennis courts at Ahwahnee Lodge.

“Ahwahnee tennis courts. Since Ahwahnee Hotel is an historic structure the grounds should be part of it. The courts are part of the cultural (people) landscape - provide some variety for outdoor exercise options for locals as well as visitors; are low impact, low tech, low-visibility, non-polluting, not in river protection area; and do not affect the Valley footprint as seen from above. They cause no harm, so why take away something of value?” (Individual, Yosemite National Park, CA - #201)

Response: The tennis courts were constructed in 1927 and were identified as a contributing structure in the 1994 *Yosemite Valley Cultural Landscape Report*. However, when evaluating the other cultural and natural resource values of the landscape holistically—the black oak woodlands and the meadow itself—those values combined to create a greater good for resources stewardship. Thus, the National Park Service has proposed restoring the black oak woodland and meadow as elements of the landscape ecosystem rather than preserving the tennis court as an isolated feature.

393. Public Concern: The National Park Service should ensure that the removal of the tennis courts at the Ahwahnee Lodge does not damage adjacent sequoia trees.

“I want to call special attention to something that concerns me regarding the removal of the tennis courts at the Ahwahnee. There are seven or eight beautiful ‘young’ giant sequoias surrounding the tennis courts. There is a very

great chance that their roots will be disturbed in an effort to take out the tennis courts, and the trees will suffer accordingly. I have recently observed this very thing happened to a magnificent, well-established giant sequoia that is about 95 years old and growing next to a church in Berkeley. The tree was in absolutely flawless condition until construction was done on the property next to the tree three years ago. Unfortunately, the side of the tree next to the construction has suffered from branch die back. Since the tennis courts are not used and exist on an area of the Ahwahnee grounds where a few people go, it does not seem to be worth the risk to tamper with the soil there. Take the fence down, but be particularly judicious when considering the removal of the concrete slab, lest the roots of the trees be disturbed.” (Individual, No Address - #3819)

Response: The intent of the National Park Service would be to remove the planted giant sequoia trees surrounding the Ahwahnee tennis courts during removal of the courts themselves. California black oak woodlands surround this site, one of the highly valued resources identified in the Preferred Alternative of the *Final Yosemite Valley Plan/SEIS*. The giant sequoias do not contribute to the ecological function of the oak woodland or adjacent riparian and meadow habitats (also highly valued resources) and are not native to the floor of Yosemite Valley. (Sequoias did not survive glaciation of Yosemite Valley, and the distance from the three existing groves in Yosemite National Park to Yosemite Valley precludes their natural post-glacial reintroduction). Finally, these trees have reached reproductive age, and are able to produce seedlings if other conditions are favorable. Since the surrounding black oak and meadow communities will be maintained, in part, with prescribed burning, conditions will be created that would facilitate establishment of giant sequoias, resulting (eventually) in a non-native giant sequoia grove inappropriate to Yosemite Valley. The impacts of removal of these and other individual sequoia trees are explained in the Rare, Threatened, and Endangered Species section of Chapter 4, Environmental Consequences, of the *Final Yosemite Valley Plan/SEIS*.

637. Public Concern: The National Park Service should remove the tennis courts from Yosemite Valley.

“The tennis courts should be removed. Tennis is not necessary part of a Yosemite experience.” (Individual, Visalia, CA - #5714)

Response: The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* proposes the removal of the tennis courts at the Ahwahnee.

(Also see response to concern #82.)

638. Public Concern: The *Yosemite Valley Plan* should retain public swimming pools in Yosemite Valley.

“I agree that the swimming pools should remain, if only for the fact that they may help keep more people from swimming in the Merced River and thus causing pollution and possible damage to the river environment.” (Individual, Columbia, CA - #7149)

Response: The existing swimming pools at lodging in Yosemite Valley are retained in the Preferred Alternative of the *Final Yosemite Valley Plan/SEIS*.

140. Public Concern: The *Yosemite Valley Plan* should require the removal of public swimming pools from Yosemite Valley.

“The multiplier effect comes into play dramatically for swimming pools: They must be staffed, cleaned, and maintained. More towels need to be washed. Pools require shipments of noxious chemicals and place considerable demands on the water supply and wastewater disposal systems. They are in fact, ‘detracting developments’ of exactly the sort that Olmsted objected to. The YVP does not call for the removal of swimming pools and in fact calls for the Curry Village pool to ‘be rehabilitated or replaced.’ This is justified because the pools have ‘historic value’ and they ‘help reduce the impact of swimmers along the Merced River.’ . . . The environmental degradation, outlined above, due to pool swimming probably exceeds the environmental degradation due to river swimming,



especially if river swimmers are 'directed toward river areas not able to withstand heavy use, such as sand and gravel bars.' Finally, if 25% of the millions of Valley visitors swim in the river, then the pools can at best siphon off only [a] minute percentage of swimmers." (Individual, Oberlin, OH - #580)

Response: Removal of pools was addressed in the 1980 *General Management Plan* and the 1992 *Concession Services Plan*. The pools will be retained to provide an alternative for swimming in the Merced River, and also to help lessen impacts on the Merced River ecosystem.

Note: One response is provided for concerns #282, #571, and #639, and is placed following concern #639.

282. Public Concern: The *Yosemite Valley Plan* should retain an ice rink in Yosemite National Park.

"In regards to the ice rink, I would like to see an ice rink in Yosemite, but not necessarily in the Valley." (Public Hearing, Sonora, CA - #20286)

Response: See response following concern #639 below.

571. Public Concern: The National Park Service should remove the ice rink at Curry Village.

"We suggest that the ice rink be removed and that its section of Curry Village be used for more cabins." (Individual, Stockton, CA - #2335)

Response: See response following concern #639 below.

639. Public Concern: The National Park Service should not construct a new ice rink in Yosemite Valley.

"My proposed guidelines for recreational activities in the Valley which apply to ice skating as well as rafting. They are not vital means of transportation, there is nothing unique about doing them in the Valley other than having a spectacular background, they do not benefit the natural environment, and they can be done in some other place than our special Valley. For these reasons, a new ice rink should not be built either." (Individual, Columbia, CA - #7149)

Response: The removal of the ice rink at Curry Village was proposed in the Preferred Alternative of the *Draft Concession Services Plan* in 1991. Based on public comment at that time, the Preferred Alternative was revised to retain an ice rink in the 1992 *Concession Services Plan*. That decision, based on public input, was not revised in the *Final Yosemite Valley Plan/SEIS*, but the facility would be relocated to allow for more efficient design of the Curry Village area.

This response also applies to concerns #282 and #571.

554. Public Concern: The National Park Service should remove the Wawona golf course.

"We oppose the retention of the golf course at Wawona under this plan. It is, again, indicative of the lack of guidance from an adequate and final Merced River Plan. The scenic, biological, and water quality impacts from the golf course are not dealt with in the YVP." (Conservation Organization, Yosemite, CA - #7883)

Response: This concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan*. The Wawona Golf Course, opened in 1918, is the oldest in the Sierra and part of the historic tourism culture of Yosemite National Park.

4.11.4 ~ Orientation and Education

Interpretation and education serve a vital role in the National Park Service's mission to promote understanding and responsible enjoyment of Yosemite National Park. In order to better fulfill this mission, some people propose expanding the ranger presence in Yosemite Valley by increasing ranger-led interpretive programs. Others recommend that the *Yosemite Valley Plan* encourage the Yosemite Institute to maintain affordable quality interpretive and educational services for all park visitors. In addition, people offer a myriad of suggestions for improving orientation and interpretative programs: visitor service sites with orientation and interpretative programs at out-of-Valley parking facilities, an interpretive partnership with the National Geographic Society, visitor information services at entrance stations, orientation and interpretive services on shuttle buses, interpretive resources on multi-use paved trails, a nature club for park visitors, and a park directed visitor wellness program.

People express an array of concerns regarding the development and location of visitor centers in the park. While some respondents propose not developing a new visitor center in Yosemite Village, others believe that the visitor center should be retained at its current location along with directional signs near the entrances clearly showing the location of Yosemite Village. Whereas some suggest constructing visitor centers at gateway communities to alleviate congestion near park entrances, others recommend locating visitor centers at park entrances because they believe that "A visitor center near an entrance welcomes the public to the unique park wonders that lie ahead." Conversely, another respondent believes it is "unnecessary and fiscally wasteful" to locate a visitor center at each park entrance and that the existing centers are adequate. Other people offer proposals for visitor centers: convert the existing museum into a visitor center, partner with CALTRANS to establish a visitor center at Yosemite Junction, and develop visitor facilities at Badger Pass including a visitor center and transfer facility for easy access to areas outside of the Valley. Some people address operational concerns including extending the Yosemite Valley visitor center hours to accommodate early morning and evening visitors and opening the Happy Isles Nature Center year-round.

In addition to the aforementioned concerns, many people comment on interpretive and educational facilities in Yosemite Valley. Several respondents offer suggestions regarding the Art Activity Center in Yosemite Valley. For instance, some people insist that the Art Activity Center be retained in Yosemite Valley, although one person recommends that the facility be moved to the Wilderness Center or the Superintendent's House (Residence 1). In addition, one respondent recommends the *Yosemite Valley Plan* provide a permanent solution for the problem of housing for visiting artists in Yosemite Valley. Other people offer suggestions for interpretive and educational facilities in Yosemite Valley: construct a natural history museum outside of the Valley; convert the Ahwahnee Hotel into a natural and cultural history museum; make the Yosemite art collection available to the public; consolidate the research library, museum collection, and archives in Wawona; and convert the Curry Village Post Office into an historic exhibit. One person proposes removing the Ansel Adams Gallery from Yosemite Valley and eliminating the structure that currently houses the gallery to further the goal of Valley restoration. Another respondent recommends applying access controls to the new interpretive amphitheater proposed for the vicinity of the concessioner stable parking lot.

125. Public Concern: The National Park Service should improve education and orientation programs in Yosemite Valley.

"Offer an orientation video to sites and how to get to them by public transit etc. for tourists vs. hikers.



Offer far more educational programs, orientations, sensitivity training, ecology training at visitors center. There is confusion in the image of the park as a place to exploit nature - i.e. climbing, van & car, vs. sensitivity to ecology. Very unclear messages. Too bad. Seemed to us like a place on the edge of ruin and we were there off season!" (Individual, West Roxbury, MA - #102)

Response: An improved sequence of orientation to park features, activities, and resource stewardship would be implemented in the Preferred Alternative. Additionally, interpretive programs would be expanded to assist visitors in enjoying park resources while assisting in resource preservation. Though outside the scope of the *Yosemite Valley Plan*, a parkwide interpretive plan is being developed that emphasizes improvement of interpretive services by the National Park Service and each of its partners in interpretation. A primary goal of that plan is to develop a program that would reach the majority of park visitors with a consistent stewardship message. (Also see response to concern # 259.)

746. Public Concern: The National Park Service should provide ranger-led interpretive and educational programs in Yosemite Valley.

"Bring back the Ranger and naturalist talks and walks. An examination of the schedule of events from years ago, and comparing it to the current one will show you how much we have lost." (Individual, Reseda, CA - #4421)

"NPS Interpretive rangers do a wonderful job of educating the public, but they are such a small force when you consider the many thousands of daily visitors who will never come close to talking to a ranger. . . What Yosemite herself needs the most are enlightened, educated, concerned visitors. We need multiple interpretive park rangers all day, every day, throughout the summer roving and educating at key locations . . . these are the places where huge crowds of innocent ignorant happy visitors feed animals, throw rocks, trash the vegetation, and cause significant resource impacts. Many also look at the beautiful scenery, read an interpretive sign, snap a photo, and leave with a gaping missed opportunity for deeper understanding of this sacred place. Do we want visitors to refrain from feeding animals? Then we need to educate them better. Do we want to remove the ugly and unnatural 'restoration keep out' fencing all over the Valley? Then we need to teach people how to best take care of the resources. The signs, notices, and announcements in the 'Yosemite Guide' are not enough. People need more personal contact. That is the NPS mission!" (Individual, El Portal, CA - #7866)

Response: The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS*, as described in Vol. IA, Chapter 2, Alternatives, Visitor Experience—Orientation and Interpretation, proposes increases in interpretive services and facilities, particularly to meet the increased and diverse needs of visitors touring by means other than in private vehicles.

568. Public Concern: The *Yosemite Valley Plan* should encourage the Yosemite Institute to provide affordable quality educational services.

"Here [it] comes down to the question: Is this excellent educational program only affordable for richer people? I cannot help to feel desperate about the new plan. In truth, I consider myself very lucky to have the chance to experience the teaching from YI before the new plan takes effect. Otherwise, I would never have learned the importance of the nature environment because I would not have been able to attend the program. Nevertheless, I hope YI can keep its integrity to provide valuable educational experience with minimum cost for more students to come." (Individual, Upland, CA - #1018)

Response: This concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan*. The *Final Yosemite Valley Plan/SEIS* does not address the affordability of programs offered by the Yosemite Institute.

139. Public Concern: The National Park Service should provide orientation opportunities and visitor services at the proposed out-of-Valley parking facilities.

“When the out-of-Valley parking areas are constructed, most visitors will stop there. . . These three sites should be developed for orientation and interpretation, and for gift sales and food service, to make them not just parking lots but welcoming reception areas. More visitors will pass through the three out-of-Valley reception areas than will pass through any single point within Yosemite Valley. Visitors who choose only to tour the western Valley in their cars will not even approach Yosemite Village. Thus the three reception areas, not Yosemite Village, are the logical sites for visitor service, orientation, and interpretation development. . . 1) Visitors can take advantage of their 'waiting for the bus' time at the visitor center. 2) Each visitor center should have an interpretive trail. 3) Given the increased orientation and interpretation opportunities at the out-of-Valley parking areas, there is no longer any need to develop a new full service Valley Visitor Center in the Yosemite Village area. The existing visitor center will be adequate.” (Individual, Oberlin, OH - #580)

Response: While there is value in placing orientation facilities at the out-of-Valley parking areas for the smaller number of visitors who would park there, the need for orientation and sense of arrival for all visitors to the park can be accomplished at proposed visitor centers near each park entrance (see the *Final Yosemite Valley Plan/SEIS*, Vol. IA, Chapter 2, Alternatives, Visitor Experience—Orientation and Interpretation). In the case of El Portal and Big Oak Flat under the Preferred Alternative in the *Final Yosemite Valley Plan/SEIS*, orientation facilities have the potential to be located near day-visitor parking. Otherwise, the intent at the out-of-Valley sites is not to create new areas of extensive development, but for these sites to serve as quick transfer points to transportation to Yosemite Valley. Comfort facilities (such as restrooms, drinking fountains, and perhaps minimal food services) would be needed, but additional development would be avoided. Visitor orientation would be limited to information about the shuttle bus operations and transit facility in Yosemite Valley and activities in the immediate area of the parking facility.

419. Public Concern: The National Park Service should enter into an interpretive partnership with the National Geographic Society and interpret global issues at Yosemite National Park.

“The new visitor center is mentioned, and I was struck repeatedly at Yosemite at what a great opportunity we have to directly educate 3.5 million visitors about the environment and the strategy of 'think global, act local.' You should team up with National Geographic—they have an excellent exhibit in DC and tremendous fundraising capacity—or someone like that to fund this. The visitor center should help people understand how things like turning off the water when you brush your teeth, recycling, not driving a car—all those things impact the environment all over the world. When we do the right thing in our local communities, we do the right thing by Yosemite.” (Individual, Washington, DC - #4853)

Response: Interpretive partnerships are outside the scope of the *Yosemite Valley Plan*, but are being considered as part of long-range and annual interpretive planning. While there is long-range value in developing exhibits at Yosemite that interpret global issues, for visitors to maintain an interest in Yosemite’s exhibits they must meet the immediate needs of the visitor while in the park. Exhibits that simultaneously meet visitor desires to understand Yosemite’s stories and provide direct connections between Yosemite’s resources and larger issues are ideal. Even more effective than exhibits at making these connections are the live programs presented by interpretive staff, which have the highest priority in the park for this type of message delivery.

745. Public Concern: The National Park Service should improve visitor information services at Yosemite National Park entrance stations.

“Everyone receives the Yosemite newspaper guide when entering the Valley but I don't think everyone reads it to find out the 'do's' and 'don'ts.' Perhaps a better mechanism can be developed to insure that people are informed (day visitors and overnight visitors).” (Individual, San Diego, CA - #7309)



“Better information at the entrance stations is needed, especially a detailed map of the east end of the Valley.” (Conservation Organization, Fresno, CA - #7881)

Response: The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* proposes improvements in the way that visitors are informed about activities, opportunities, and stewardship in Yosemite National Park, including substantial improvements in orientation facilities near each park entrance.

376. Public Concern: The National Park Service should provide orientation and interpretative services on shuttle buses.

“The present shuttle system is a transportation system, but the new In-Valley Shuttle System will serve an increasing role in providing Park interpretation. To fulfill this role, it is recommended that recorded narrations be rented at Valley Visitor Centers, similar to headset systems provided at museums. The recorded narrations could repeat the words of Muir, Roosevelt, Adams and others who have spoken and written eloquently about Yosemite and entertainingly provide information to people who would not otherwise have the opportunity to experience Park interpretive programs. This approach could reduce the need for separate Valley Floor tours (which add traffic and disruption to the Valley) and guarantee more customized (children, foreign languages) and controlled descriptions of Valley sites.” (Business, Yosemite National Park, CA - #3962)

Response: The National Park Service has been examining methods for providing orientation and interpretation on both shuttle and transit buses, particularly those traveling from outside Yosemite Valley. Replacing the Valley Floor Tour in its entirety could require an increase in the number of shuttle buses and a route expanded beyond that proposed in the *Final Yosemite Valley Plan/SEIS*. While the specifics on how to accomplish these objectives are outside the scope of the *Yosemite Valley Plan*, orientation and interpretative services on shuttle and transit buses will continue to be evaluated as part of the long-range and annual interpretive planning process.

380. Public Concern: The National Park Service should maximize the placement of interpretive resources along multi-use paved trails in Yosemite Valley.

“To maximize the interpretive value of these new trails, it is recommended that a series of interpretive signs about the natural and cultural history of the Valley be placed along the trail along with rest areas for bicyclists (including racks) and walkers.” (Business, Yosemite National Park, CA - #3962)

Response: The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* (see Vol. IA, Chapter 2, Alternatives, Visitor Experience—Orientation and Interpretation) proposes the development of an exhibit plan to evaluate locations of existing exhibits and to recommend new exhibits and interpretive trails, with a focus on new pedestrian and bicycle trails.

432. Public Concern: The National Park Service should establish a nature club for Yosemite National Park visitors.

“You should also directly engage people in the wildlife issue and use some sort of nature club to educate people. They take a class and get some sort of reward when they finish—I am thinking a short, 30 minute experience on the basics of man co-existing with wildlife. Get your food out of the car, etc. etc. Help people understand how their actions impact the Park as a whole, and how, when they return to real life, they need to become more wildlife savvy to support wildlife world-wide. Tell them what you need them to do: bear food, no litter, less plastic, less waste, visit the less heavily-used sites (or visit the used sites to control damage, I don't know which you want), mix your trips to Yosemite with trips to other less-used parks (lots of people come to Yosemite every year, and that may be something to reconsider), and whatever other stuff you do/don't want people to do. Then, you get something like a 'Yosemite hat' and the only way you can get it is to score xx on the Yosemite earth friendly test. This is why you need some types of funders, especially corporate folks. I know you need to be careful with fund raising stuff so you don't end up putting corporate logos on Yosemite, but it is a great source of funding to augment government funds, and will increase your political power.” (Individual, Washington, DC - #4853)

Response: Development of specific interpretive programs (such as a nature club) is outside the scope of the *Final Yosemite Valley Plan/SEIS*, but is being considered as part of ongoing long-range and annual interpretive planning. Present proposals do include the reestablishment of the Yosemite Guardian program, similar to the concept described above in the sample quote. The program is also similar to the Junior Ranger program currently being operated by the park. The park's concessioner and other partners also provide family-oriented nature programs that present some of Yosemite National Park's resource issues.

435. Public Concern: The *Yosemite Valley Plan* should establish a wellness education program for Yosemite National Park visitors.

"I am just dreaming here, and I am a health care advocate, but a little bit on how having good health (moving your body and eating right) makes it possible for people to do all the fun stuff like hiking, swimming, biking—climbing up to see the waterfalls. The place is very inspiring and people naturally want to be active—so it would be a good thing to drive that lesson home to folks, so they will work out during the year and come to Yosemite prepared." (Individual, Washington, DC - #4853)

Response: This concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan*. The establishment of a wellness education program is an operational/human resources issue.

20. Public Concern: The *Yosemite Valley Plan* should not require the development of a visitor center in Yosemite Valley.

"I am against another visitor center in the Valley. The pristine bend in the Merced River, that is a possible site for a new visitor center, should again remain in its present pristine state for future generations." (Individual, No Address - #30090)

Response: The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* proposes a new visitor center in the Yosemite Village area of the Valley to serve the large number of visitors in Yosemite Valley each day. Visitor centers serve both orientation and educational needs necessary to provide a safe and enjoyable visit and to assist in the protection of park resources. The new visitor center would be located in an appropriate area compatible with the *Merced River Plan/FEIS*.

657. Public Concern: The National Park Service should retain the Valley Visitor Center in Yosemite Village.

"The main visitor center should remain in Yosemite Village where development already exists. It should be simple to post directional signs near the entrances clearly showing the way to the Village for those first-time tourists who need it, or else prepare a special flyer to be handed to those who have never been in the park. As far as new visitor centers at the entrance stations - where is the space? We fail to see why removal of more forest areas is acceptable." (Individual, Madera, CA - #6493)

Response: The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* proposes a new visitor center in the Yosemite Village area to serve the large number of visitors in Yosemite Valley each day. Visitor centers serve both orientation and educational needs necessary to provide a safe and enjoyable visit and to assist in the protection of park resources. (Also see response to concern #110 for a discussion of entrance station visitor centers.)

110. Public Concern: The *Yosemite Valley Plan* should provide for the construction of visitor centers in gateway communities.

"Constructing Visitor Centers at Park entrances . . . would waste Park land and cause congestion of vehicles and visitors near park entrances. A better approach would be to provide roadside Yosemite Visitor Information Centers



away from the park boundaries at Oakhurst (Hwy 41), Mariposa (Hwy 140), Groveland (Hwy 120), and Lee Vining (Hwy 120). The same functions could take place in those locations.” (Individual, Los Angeles, CA - #470)

Response: The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* (Chapter 2, Alternatives, Visitor Experience—Orientation and Interpretation) proposes sequential orientation measures, including providing greater support for joint-agency visitor centers in gateway communities. While some visitors would utilize these facilities, many more would seek in-park activity planning information closer to the park. Visitor centers near each entrance (inside or outside the park) would serve the needs of these visitors, would contribute to a sense of arrival, and would provide interpretive exhibits and activities, which are much more effective when experienced within the resource being interpreted.

277. Public Concern: The National Park Service should construct visitor centers at Yosemite National Park entrances.

“Entrance Station Visitor Centers: A Visitor Center near an entrance welcomes the public to the unique park wonders that lie ahead. Maps and 'how to' directions outlining the many means for mental and physical exploration can be offered. A range of natural and historical information can ignite a visitor's curiosity. Each park entrance has an historic personality, and can be designed to set it apart from the park as a whole. Regardless of the visitor's attention span, each has some degree of hunger for knowledge and understanding. If that is attended to early in a visit, the entire time spent in the park can become more valuable.” (Individual, Seattle, WA - #1354)

Response: Chapter 2, Alternatives, Visitor Experience—Orientation and Interpretation, describes the proposed visitor orientation sequence for each alternative. Each of the action alternatives proposes visitor centers near each of the park entrances. Future planning would determine exact locations, but the intention is to have these facilities provide orientation, visit planning, area-specific interpretation, and a sense of arrival.

(Also see response to concern #110.)

424. Public Concern: The National Park Service should reconsider the *Yosemite Valley Plan's* proposal to build visitor centers at Yosemite National Park entrances.

“It is unnecessary and fiscally wasteful to have a visitor center at each Park entry as outlined in Alternatives 2, 3, 4, and 5. Visitor centers at Yosemite Village and Tuolumne Meadows are adequate.” (Individual, Lodi, CA - #4474)

Response: Visitors, particularly those visiting for the first time, often seek out a visitor center upon arrival to assist them in planning their activities while in the park. A visitor center near the entrance would provide them immediate access to information and interpretation that would help visitors enjoy the park. Also, some visitors may choose not to or may not be able to travel to visitor centers located in Yosemite Valley or Tuolumne Meadows. Visitor center services located at park entrances (part of the traveler information and traffic management system described in Chapter 2 of the *Final Yosemite Valley Plan/SEIS*) would assist visitors in choosing alternative locations and activities, making accommodation arrangements, obtaining wilderness permits, or selecting activities outside the park. In addition to providing a brief park overview, the visitor center interpretive exhibits would interpret resources in their vicinity, assisting visitors in enjoying the diverse recreational, natural, and cultural resources available parkwide. These visitor centers would provide necessary visitor services, reduce unnecessary travel, and lead to more enjoyable visitor experiences. They would generally replace present, seasonally staffed visitor contact stations near each principal entrance.

(Also see the response to concern #110.)

400. Public Concern: The National Park Service should convert the existing museum into a visitor center.

“Convert the existing museum to a Visitor Center.” (Conservation Organization, Camarillo, CA - #2627)

Response: The differing functions of a visitor center and a museum both have value for Yosemite Valley visitors. The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* keeps all preservation and research functions of the Yosemite Museum in Yosemite Valley. The extensive collection of museum objects relates closely to Valley resources and, like any interpretive program, finds its greatest value when interpreted in its physical context. The National Park Service would like to make the extensive natural history, art, and American Indian collections, among others, more accessible to park visitors. The Yosemite Museum was the first in the National Park Service, and the existing museum building was constructed with donated funds. Continuation as a museum is the highest possible use for this building from a historic preservation perspective. The broader, less specific, and less object-oriented information and educational goals of a visitor center should be met at the closest opportunity to the place of visitor arrival. Therefore, in the final Preferred Alternative, the Valley’s visitor center would be located at the edge of the parking and transit facility to immediately serve the needs of arriving visitors.

232. Public Concern: The National Park Service should work with CALTRANS to construct a combined Yosemite National Park entrance and visitor center at Yosemite Junction.

“Entrance Station Visitor Centers: These centers should specialize in the orientation of arriving first time visitors and leave the interpretation of natural resources to the Valley Visitor Center. The Visitor Center for the Highway 120 entrance should be combined with a major Roadside Rest being planned by CALTRANS at the junction of Highway 120 and Highway 108 (Yosemite Junction) and be operated in cooperation with the Tuolumne Visitors Bureau, which currently operates a center at that location. Park entrance passes could be presold, and information given on camping and lodging availability.” (Individual, Columbia, CA - #1322)

Response: The *Final Yosemite Valley Plan/SEIS* Preferred Alternatives proposes visitor centers near each principal park entrance. Determining specific locations for visitor centers is outside the scope of the *Yosemite Valley Plan*. The locations and scale of these facilities will be determined through future planning, including the traveler information and traffic management system which will be initiated shortly after the completion of the *Yosemite Valley Plan*.
(Also see response to concern # 110.)

455. Public Concern: The National Park Service should develop year-round visitor facilities and recreation opportunities at Badger Pass.

“Visitors should be given more opportunities for easy access sight seeing outside of Yosemite Valley. I believe that Badger Pass should be developed for spring, summer, and fall use, as well as expanded use in winter. Here we have around one thousand parking spaces that could accommodate all overflow traffic from Yosemite Valley. The lodge at Badger Pass could be converted to a visitor center and shuttle bus boarding area to Glacier Point as well as the rest of the Park where car traffic is restricted. Restaurant and restroom facilities already exist and employee housing could be constructed to service Badger year round.” (Individual, El Portal, CA - #6787)

Response: The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* would maintain parking at Badger Pass for use as needed year-round and existing visitor facilities could be utilized. While there is potential for transportation links from Badger Pass to other parts of the park, establishing these links is beyond the scope of the *Final Yosemite Valley Plan/SEIS*.



504. Public Concern: The National Park Service should extend the hours of the Visitor Center in Yosemite Valley.

“The opening hours of the Visitor Center are not very user-friendly either: it closes at 5 PM, which is a pity if someone arrives in the afternoon (some of the buses do). Even if you cannot simply extend the opening hours, it would be better to be open in the morning and in the evening and have a break during the day: After all, people are engaged in all kinds of activities (tours, hiking, trips, etc.) during the day.” (Individual, No Address - #2528)

Response: This concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan*. The Yosemite Valley Visitor Center extends hours into the evening during the busiest seasons. The operating hours of all visitor centers would be determined in annual operations planning which coordinates staffing in order to meet the greatest needs of visitors.

569. Public Concern: The National Park Service should ensure that the Happy Isles Nature Center is open on a year-round basis.

“Operate the Happy Isles Nature Center on a year-round basis by assigning the building to the Yosemite Fund/Yosemite Institute working in partnership through a cooperative agreement.” (Individual, Lafayette, CA - #4499)

Response: The *Final Yosemite Valley Plan/SEIS* Preferred Alternative calls for keeping the Nature Center at Happy Isles open year-round. The nonpeak season months see the highest visitation to Yosemite National Park by educational groups, and there is already a demand for use of the Nature Center during the winter by these groups. Educational groups visiting the park during the winter, particularly in time of inclement weather, seek interpretive opportunities indoors, in addition to outdoor activities. Yosemite National Park’s draft *Long-Range Interpretive Plan* proposes expanding use of the Nature Center at Happy Isles for educational groups, and anticipates training educators to use its resources in the winter without the need for additional park staff, or expanding partnerships for the building’s operation. Because the road to the Nature Center is routinely cleared of snow for access to nearby utility facilities, winter conditions would have little adverse effect on its use.

704. Public Concern: The National Park Service should retain the Art Activity Center in Yosemite Valley.

“Moving the Art Center to El Portal is ridiculous. Who would go to El Portal for painting classes or art supplies once they’re in the Park. This proposal sounds like you want to eliminate the Art Center all together. If I’m wrong don’t remove it. If I’m right I know artists will miss it from your Michel Angelo to Andy Warhol and beyond.” (Individual, Yosemite National Park, CA - #4344)

Response: The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* proposes retention of the Art Activity Center in Yosemite Valley.
(Also see the response to concern #264.)

264. Public Concern: The National Park Service should consider the relocation of the Art Activity Center in Yosemite Valley.

“Art Activity Center: The Center should be moved to the current Wilderness Center area or to the Historic Superintendent’s House, while restoring its current site or using it as a new Visitor’s Center. The function of the Activity Center is to provide visitors an active link between past and present.” (Individual, Seattle, WA - #1354)

Response: The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS*, as described in Vol. IA, Chapter 2, Alternatives, Visitor Experience—Orientation and Interpretation, proposes to relocate the Art Activity Center to the present Wilderness Center.

695. Public Concern: The *Yosemite Valley Plan* should establish housing for visiting artists in Yosemite Valley.

“Under the DYVP, the Art Activity Center is to be relocated to the former Pohono Indian Shop, where the Wilderness Center is now functioning. To make the center effective, there should be some consideration given in the plan to housing for visiting artists. For years, artist housing has been a problem, and we recommend that a permanent solution be proposed in the plan.” (Non-Governmental Organization, El Portal, CA - #9476)

Response: Housing for visiting artists associated with the Art Activity Center is included within the housing proposed under the Preferred Alternative in the *Final Yosemite Valley Plan/SEIS*. The assignment of specific quarters is an operational issue outside the scope of this planning effort.

219. Public Concern: The National Park Service should build a natural history museum outside of Yosemite Valley.

“Vol. 1A, Chapter 2, Table A Summary of Major Changes in Relation to Existing Conditions. Convert the NPS Administration Building to a natural history museum . . . This Activity could be located outside the Valley. Possible locations include the Yosemite Institute area, Wawona or even outside the Park in Mariposa or Groveland.” (Individual, Livermore, CA - #3091)

Response: The Yosemite Museum is proposed to remain located in Yosemite Valley for several reasons. The Yosemite Museum was the first museum established within the National Park Service. It was also the birthplace of interpretation in the National Park Service. Like other interpretive functions, the museum is most effective when its collections are exhibited and its education programs are conducted within the geographical context of the park resources represented in the collection. The Yosemite Museum is also very closely associated with American Indian resources in Yosemite Valley. The museum (which includes an archive, research library, and graphic collections – see Vol. 1A, Chapter 3, Affected Environments, Cultural Resources—Museum Collection) receives greater visitation than most in California. However, most of that use is of a casual nature—few visitors other than serious researchers would travel to the museum if it were located outside the Valley or park. But being in proximity to the visitor center invites this casual use and makes its important collections accessible to millions of visitors each year. Also, from a historic preservation perspective, the most appropriate possible use for this historic building would be to continue its original use as a museum.

397. Public Concern: The National Park Service should convert the Ahwahnee Hotel to a natural and cultural history museum.

“Convert the Ahwahnee Hotel to a natural and cultural history museum, research library, and auditorium to feature Yosemite National Park as the living laboratory it is, protecting one of our most magnificent centerpieces of National Heritage.” (Conservation Organization, Camarillo, CA - #2627)

Response: The Ahwahnee is indeed a national treasure, reflected in its designation by the Secretary of the Interior as a National Historic Landmark. Section 110 of the National Historic Preservation Act requires federal agencies to exercise a higher standard of care when considering undertakings that might adversely affect National Historic Landmarks. In consideration of its historical value, its continued use as a hotel (as originally designed) is the highest and best use of the structure and is most compatible with its historic preservation.

576. Public Concern: The National Park Service should make the Yosemite art collection available to Yosemite National Park visitors.

“We failed to find a reference to the art museum and the display of the considerable collection of Yosemite art pieces that have been garnered over the years. We were amazed when we viewed the Dave Robertson Cook to



discover what a rich collection the Park owned. It would be a shame not to make those pieces available to the Park visitor as a way to experience the historic Yosemite.” (Individual, Camp Sherman, OR - #1801)

Response: In all alternatives of the *Final Yosemite Valley Plan/SEIS*, the National Park Service continues to make the art collection available to park visitors. The Yosemite Museum is an element that is addressed in sections relating to both cultural resources and in visitor experience. Several alternatives propose two museums, one dedicated to natural history and one to cultural history. There is no separate museum proposed solely for art history, but art is an important element in interpreting both natural and cultural history and portions of the art collection would be used to achieve that goal.

In the present historic Yosemite Museum, one gallery is devoted to rotating exhibits which are assembled to interpret the works of one artist or a group of artists, (painters, photographers, and sculptors). Several of the shows have also traveled to other museums as well. Over 90,000 visitors a year experience the various rotating exhibits in the Museum Gallery.

The museum also has an active loan program which provides the opportunity for other museums to borrow pieces for their exhibits, allowing the Yosemite collections to have a wider impact. At any one time the National Park Service has 200 to 300 pieces from the collection on loan to other institutions.

The Yosemite Museum collection is available to scholars and to park visitors by appointment. In the new collection storage facilities proposed in the Preferred Alternative to be placed in Yosemite Valley, the collections would be consolidated in modern facilities meeting all current museum storage standards. These facilities would be able to accommodate more visitors and researchers, but would not have exhibit space. The exhibits would remain in Yosemite Valley in the original, historic museum building, which would continue to have a rotating exhibit gallery and would also incorporate other fine art pieces in permanent exhibits.

141. Public Concern: The National Park Service should consolidate the research library, museum collection, and archives in Wawona.

“The research library, museum collection, and archives will be consolidated into a single site on the Valley floor (page 2-33, see also page 16). These collections should indeed be consolidated in an improved facility, but the logical site for that facility is Wawona adjacent to the Pioneer Yosemite History Center.” (Individual, Oberlin, OH - #580)

Response: Under the Preferred Alternative in the *Final Yosemite Valley Plan/SEIS*, park offices, including resource management staff and park headquarters, would move to the El Portal Administrative Site. In order to have the important reference materials available to staff and managers, it is necessary to consolidate the collections in one location. Currently a portion of the museum collection and archives is housed in El Portal. For operational efficiencies it is preferable to move the remainder of the collections to the Valley rather than Wawona.

575. Public Concern: The National Park Service should convert the post office in Curry Village into an historic exhibit.

“Post Office at Curry Village. Convert to an exhibit of historic interest, interpreting the history of mail service in the Park.” (Individual, Lafayette, CA - #4499)

Response: The original Camp Curry Post Office currently functions as a registration building for visitor facilities in Curry Village. As part of the revised Preferred Alternative for the *Final Yosemite Valley Plan/SEIS*, this facility would be rehabilitated for continued use as a registration building. As part of this rehabilitation, the National Park Service would consider interpreting the historic use and function of the building.

220. Public Concern: The National Park Service should remove the Ansel Adams Gallery from Yosemite Valley.

“Vol. 1A, Chapter 2, Alternatives Considered But Dismissed, Remove the Ansel Adams Gallery: ' . . . These structures are considered historic . . . the services they offer benefit visitors and the community.' These structures are not historic enough. They have no significance other than they are old by human-built structure standards. Although I enjoy the works of Ansel Adams, as well as Galen Rowell and Albert Bierstadt, a gallery showing Yosemite art, would have just as much significance if located in Coarsegold, Mariposa or Groveland. These buildings could be removed, furthering the goal of restoring Yosemite Valley to a more natural state.” (Individual, Livermore, CA - #3091)

Response: Under the provisions of the National Historic Preservation Act of 1966, the National Park Service is required to evaluate the significance of structures that are 50 years old. The structures associated with The Ansel Adams Gallery were evaluated and found to be significant enough for listing on the National Register of Historic Places. As such they are cultural resources that the National Park Service is charged with managing.

708. Public Concern: The National Park Service should establish controls for access to the proposed interpretive amphitheater.

"The DYVP indicates that a new interpretive amphitheater is to be built in the vicinity of the current concessioner stable parking lot. We recommend that the plan specify that the amphitheater to be designed so that there is a method by which access can be controlled so that for pay interpretation (such as Yosemite Theater presentations) can take place there." (Non-Governmental Organization, El Portal, CA - #9476)

Response: This concern is acknowledged; however, operational policies and procedures for interpretative facilities are outside the scope of this planning effort. Physical elements for controlling access to the amphitheater would be considered during the design phase for campgrounds.



Section 4.12 ~ Visitor Services

Draft Yosemite Valley Plan proposals for visitor services elicited many wide-ranging comments from those who respond on the Plan. The group of concerns extracted from this spectrum of public comment is sorted into four categories: general management direction, campground management, lodging accommodation, and visitor facilities.

4.12.1 ~ General Management Direction

Public comments analyzed in this section address both the overall development of visitor services in Yosemite Valley and overnight accommodations. Moreover, analysis in the overnight accommodations section evaluates public comments that address both camping and lodging facilities.

4.12.1.a ~ General Development Direction

The importance of adequate analysis of visitor needs and impacts is highlighted by the many comments on the *Draft Yosemite Valley Plan/SEIS*. Several respondents insist that the *Final Yosemite Valley Plan/SEIS* should include an assessment of Yosemite Valley's carrying capacity in order to properly evaluate the need for various facilities. Offering a different analysis need, some people assert that the National Park Service's evaluation of the impact of winter commercial attractions is insufficient. These respondents believe the National Park Service should conduct studies to determine whether winter commercial attractions have any impact on summer congestion problems.

A great number of respondents express concern regarding the level and type of development in Yosemite Valley. Many of these people feel that the primary purpose of Yosemite National Park should be natural experiences and that commercial development should be restricted. As one respondent states, "I believe the primary purpose of the Valley should involve primitive uses." Commercial facilities and amenities, most of these people claim, add to crowding in the Valley by requiring unnecessary employees and attracting additional visitors. Several recommendations for restricting Valley development are proffered by such respondents: removing nonessential development from Yosemite Valley, encouraging the development of retail facilities outside the Valley, not replacing facilities lost to the 1997 floods, and consolidating commercial development in one area of the Valley. Impacts of the National Park Service's concessions contract are the focus of other people opposed to Valley development. The National Park Service should renegotiate the concession's contract to support plans for less Valley development, one conservation organization suggests. Contrary to those people urging restricted development, a few people believe the National Park Service should retain existing visitor service facilities in the Valley. One respondent contends that "changes to the Valley floor should be directed toward things which enhance the experience of the visitor by making the visiting process easier and reducing his difficulties and distractions."

A few respondents express concern about the perceived process of eliminating existing facilities and replacing them with new ones. These people suggest reusing existing facilities and contend that this direction is both less costly and less environmentally damaging.

Focusing on nondevelopment strategies for addressing Yosemite Valley congestions, some respondents request that the National Park Service promote the use of Yosemite National Park

backcountry areas. Other people recommend the National Park Service offer incentives to encourage spring and fall visitation.

425. Public Concern: The *Yosemite Valley Plan* should include an assessment of Yosemite Valley's carrying capacity.

"A comprehensive and current assessment of the Valley's carrying capacity in addition to regional transportation, economic and demographic impacts of the Plan's implementation should be included in the YVP. According to the 1980 General Management Plan (GMP), a guiding document for the YVP, the amount of parking is adequate to accommodate the number of visitors to the Park. Furthermore, carrying capacity of people in the Park remains undefined. The YVP claims visitor population (using a 1988 baseline) is estimated to remain unchanged in the future. California and the world population are expected to double in the next twenty years. This is an example of the YVP contradicting one of its primary source documents in addition to an inconsistent use of data and existing studies to propose the NPS's current position regarding implementation of a mass transit in Yosemite." (Tuolumne County Board of Supervisors, Sonora, CA - #4436)

Response: In Vol. IA, Chapter 2, Alternatives, Actions Common to All Action Alternatives—Visitor Use, the *Final Yosemite Valley Plan/SEIS* discusses the concept of carrying capacity. The *Yosemite Valley Plan* and the *Merced River Plan/FEIS* have both called for more rigorous implementation of the Visitor Experience and Resource Protection process, which addresses the issue of visitor levels by identifying indicators of critical conditions, the standards for those indicators, and a constant monitoring process. If the results of the Visitor Experience and Resource Protection study indicate the need for establishment of a maximum visitation level for Yosemite Valley, supplemental environmental compliance and public involvement would be conducted prior to establishing the use levels.

145. Public Concern: The National Park Service should evaluate the need for winter commercial attractions in Yosemite Valley.

"Winter entertainment and attractions in Yosemite Valley (such as the ice skating rink, wine tastings, and the Bracebridge dinner) violate Olmsted's 'no detracting development' principle, but have long been justified on the basis that they attract visitors during the off-season and thereby reduce summer crowding. But does a winter visit really reduce summer demand? Or does a winter visit actually whet the visitors appetite and stimulate summer demand? I don't know the answer to this question. The five-year 'visitor experience, resource protection, and facility capacity study, called for on pages 2-28 and 2-34, should address this issue by simply asking winter visitors, as they leave the park, whether their visit made them more or less likely to visit the park again in the summer. If the study contradicts the age-old folklore, then the winter attractions should be removed; otherwise they might remain. No new development, such as the proposed new rink, should be installed until the study is completed." (Individual, Oberlin, OH - #580)

Response: These activities were considered in the development of the 1992 *Concession Services Plan*, which prescribed the retention of the ice rink (with its winter and nonwinter uses) at Curry Village. The *Concession Services Plan* also prescribed the reduction or elimination of special events sponsored by the concessioner depending on the events' effect on general use of the park by visitors. The National Park Service would continue to periodically evaluate the effects of concessioner-sponsored special events in the park.

702. Public Concern: The National Park Service should remove nonessential commercial establishments from Yosemite Valley.

"Nonessential commercial ventures like gourmet restaurants, bars, and a surfeit of clothing, jewelry, and gift shops should not be part of Yosemite. Nor should large-screen filming facilities. This is not Disneyland or a resort; the Valley itself should be what people should be encouraged to come for." (Individual, Oakland, CA - #7673)



Response: The *Concession Services Plan/Supplemental Environmental Impact Statement*, approved in 1992, presented guidance for the management of concession services in Yosemite to meet the goals of the *General Management Plan*. The *Concession Services Plan* amends the *General Management Plan*, and provisions of the *Concession Services Plan* are incorporated into the *Final Yosemite Valley Plan/SEIS*. The *Concession Services Plan* established levels of visitor services to be provided through concession operations, with a major objective that they be compatible with park purposes and that they preserve environmental processes. The intent of the *Yosemite Valley Plan* would be to implement facility, service level, and activity provisions of the *Concession Services Plan*, unless data on floodplain, geologic hazard, or highly valued resource areas, or new operational requirements suggest the need for adjustment.

146. Public Concern: The *Yosemite Valley Plan* should encourage the development of retail services outside Yosemite Valley.

“The out-of-Valley reception areas are also the logical location for gift shops and food service. It has been my experience that visitors are more interested in shopping while traveling to or from a primary destination. Why would anyone want to spend his/her limited time in Yosemite Valley shopping? Alternative 2 calls for ‘gift sales’ in Yosemite Village and ‘food service functions [in] a new facility . . . in Yosemite Village.’ . . . These functions should be located instead in the three out-of-Valley reception areas. Other retailing functions, such as the Curry Village sport/mountaineering shop, should also be moved to one of the reception areas. Given the attractiveness, high quality, and multiple features of these out-of-Valley reception areas, most tour buses and overnight visitors will choose to stop at one even though they are not required to do so.” (Individual, Oberlin, OH - #580)

Response: Other than at out-of-Valley parking areas and El Portal, retail services outside Yosemite Valley are outside the scope of the *Yosemite Valley Plan*. Visitors may indeed enjoy having retail and food service facilities available at the remote parking areas. The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* has been revised to state that the potential need for minimal food service facilities at the remote parking areas will be evaluated. Because overnight and day visitors as well as residents would continue to require retail services within the Valley, relocation of these facilities would not be possible and any new facilities at outlying areas would duplicate those already in existence. (Also see response to concern #139.)

96. Public Concern: The *Yosemite Valley Plan* should not require the replacement of facilities lost to floods in Yosemite Valley.

“Nothing destroyed by the flood is of historical significance, only financial interest, so leave it gone. By duplicating facilities located outside of the Park the NPS is only increasing the crowding of Yosemite by bringing in even more people.” (Individual, No Address - #408)

“Taking as an example planning for the Lodge, we should not even think about replacing structures lost to the flood. Nature has done our planning, and has done a good job. Now, instead of increased development to be allowed north of a new Northside Drive, we should be thinking about how to bring the lodge and the campgrounds more ‘in touch’ with the meadow.” (Individual, Laguna Beach, CA - #350)

Response: Prior to the 1997 flood, Yosemite National Park published a *Draft Valley Implementation Plan/SEIS*. That plan included a proposal to remove facilities from the Merced River floodplain. After the 1997 flood, the National Park Service consolidated this and other draft compliance documents into the *Draft and Final Yosemite Valley Plan/SEIS*. This document considered the facilities that were lost in the 1997 flood, as well as new knowledge about highly valued resources, the Merced Wild and Scenic River, and rockfall hazards. The park is using information learned from the extent of the flood to better locate development in the Valley. The action alternatives presented in the *Final Yosemite Valley Plan/SEIS* would relocate facilities to areas less prone to severe flooding and other hazards. Executive Order 11988 allows limited development within floodplains, and park policy mandates that development within areas of fast-moving, high-energy floodwater be limited to nonovernight uses.

The 1980 *General Management Plan* called for the relocation or removal of many of these facilities to restore and protect natural processes of the Valley, including natural flood cycles, dynamic channel shifts, and interconnection of groundwater and surface water systems. Generally, in acknowledging Wild and Scenic River protection values, highly valued resources, and flood plain considerations, new and redevelopment in floodplains would be limited. However, because Yosemite Valley is relatively narrow and bounded by steep cliffs, leaving some facilities (such as roads, trails, and river crossings) in the floodplain is unavoidable.

204. Public Concern: The *Yosemite Valley Plan* should require the consolidation of commercial development in one area of Yosemite Valley.

“Yosemite Lodge, Curry Village, and Yosemite Village: I believe that all commercial development and in-valley parking should be consolidated in one area. (I realize this would require getting rid of 2 of the 3 large developed areas within the Valley and that many people would consider these 3 areas sacred but to achieve the goals I think are important, this would be a good step to take.) I believe the primary use of the Valley should involve primitive uses. . . This would reduce the number of employees required and reduce the number of visitors by not significantly catering to the visitor who is in the valley mainly to interact with commercial facilities.” (Individual, Elk Grove, CA - #132)

Response: Consolidation of commercial development in one area is not possible for several reasons. The visitor experience in Yosemite Valley should be shaped by the interaction with the park’s resources, which are both natural and cultural. The consolidation of all development in one area would involve the removal or relocation of significant historic structures and would drastically alter the cultural landscape that is Yosemite Valley. In addition, there is not sufficient developable land in one part of Yosemite Valley to consolidate all development without significant impacts to highly valued resources. Also, because the location of facilities in Yosemite Valley is also guided by zoning instituted in the *Merced River Plan/FEIS*, there is insufficient land in any one developed zone for commercial development consolidation. Instead, the emphasis of the *Final Yosemite Valley Plan/SEIS* would preserve and restore large contiguous blocks of undeveloped areas, provide for the function of natural systems, provide for the existence of wildlife travel corridors, and preserve other highly valued resources and natural systems.

689. Public Concern: The National Park Service should renegotiate the concessions’ contract prior to implementing *Yosemite Valley Plan* projects.

“Nor can this Lodge expansion be justified by reference to the Park Service’s responsibilities under the current concessioner contract. The current contract is set to expire well before the implementation of most of the YVP’s major capital projects, and it can of course be renegotiated prior to its termination. We understand that the concession company has stated that it can make a profit regardless of the configuration of in-Valley development, so long as it is allowed to renegotiate the current contract (or negotiate an entire new contract). It therefore makes far more sense for the Service to plan for less development at the Lodge and elsewhere, and then negotiate or renegotiate the contract. We strongly urge the Park Service to follow this course of action, and not allow the concessions contract to dictate the size and direction of development in the Valley.” (Conservation Organization, San Francisco, CA - #4594)

Response: This concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan*. Overall, the number of facilities that provide revenue for the concessioner would be reduced below the *Concession Service Plan* and the existing contract. The result of the Yosemite Valley planning process is likely to have a direct affect on concessioners; however, development of the *Final Yosemite Valley Plan/SEIS* has in no way been constrained by any of the existing concession contracts. Analysis has been done to the long-term financial viability of a concessioner to provide the visitor services described in each of the action alternatives, and can be found in Vol. IA, Chapter 2, Alternatives.



203. Public Concern: The *Yosemite Valley Plan* should retain existing visitor service facilities and amenities in Yosemite Valley.

“Changes to the Valley floor should be directed toward things which enhance the experience of the visitor by making the visiting process easier and reducing his difficulties and distractions. . . It should be realized that most people, while experiencing the great beauty of Valley, still want to enjoy the amenities of civilization. The Ahwahnee, Yosemite Lodge, restaurants, stores and the other facilities have been utilized and enjoyed by millions over the years and should be maintained.” (Individual, Pacific Palisades, CA - #17)

Response: In the Preferred Alternative, changes would occur in the numbers and locations of overnight accommodations, and some functions would be relocated closer to where the greatest need exists. Nearly all other visitor service facilities and amenities in Yosemite Valley would remain. Major exceptions would include the concessioner stable and the snack stand at Happy Isles, some picnic facilities, the tennis courts at The Ahwahnee, and the Village Garage.

619. Public Concern: The *Yosemite Valley Plan* should emphasize reusing existing facilities rather than constructing new ones in Yosemite Valley.

“Instead of tearing down, changing or replacing buildings, use the ones that already exist. It costs less and has less impact on the environment.” (Individual, No Address - #30240)

Response: Existing facilities are being adaptively reused to the extent practical and feasible. In some locations, the traffic circulation demands or current building requirements cannot be met through reuse of existing structures and therefore removal is proposed in order to accommodate proposed new development. In conjunction with comments received and concerns for cultural resources, the *Final Yosemite Valley Plan/SEIS* includes more adaptive reuse of structures at Curry Village and a goal to try to reuse additional historic structures if feasible at other locations during the site-specific design phases.

319. Public Concern: The National Park Service should reduce congestion in Yosemite Valley through promoting the use of backcountry areas.

“I propose that you reduce the excessive people use of Yosemite Valley by encouraging more use of the back country.” (Individual, Carmichael, CA - #1793)

Response: Access to wilderness areas is controlled by a trailhead quota system to manage the wilderness experience. There would be little opportunity to redistribute visitation in Yosemite National Park through promotion of the wilderness.

559. Public Concern: The National Park Service should offer incentives for people to visit Yosemite National Park in the spring and fall.

“You would do well to offer more incentives for people to visit in spring and fall.” (Individual, Orangevale, CA - #556)

Response: This concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan*. However, the development of the traveler information and traffic management system would evaluate incentives to provide an enhanced visitor experience.

4.12.1.b ~ Overnight Accommodations

Many respondents believe that the number of overnight accommodations in Yosemite Valley are inadequate and that the National Park Service should not reduce the numbers of lodging and camping units. Overnight stays are essential to ensure the time necessary to truly experience and appreciate the Valley, these people contend. One of these respondents specifically claims that the

effects of transportation strategies in the *Draft Yosemite Valley Plan/SEIS*—such as greater reliance on public transportation, bicycling, and walking—will necessitate longer visitor stays. Longer visitor occupancy of lodging units will require more lodging facilities if the same number of visitors is to be served, such people assert.

In contrast to these advocates of overnight facilities, some respondents feel overnight accommodations should be limited. They claim reducing overnight accommodations will help reduce crowding in the Valley. Other people take issue with this perceived connection between crowding, especially traffic congestion, and the amount of overnight accommodations. They recommend that the National Park Service reevaluate the connection between the amount of overnight accommodations and traffic congestion.

The relationship between the availability of affordable accommodations and equitable access for visitors of all economic strata is a key theme expressed in public comments. A great many respondents feel that the *Draft Yosemite Valley Plan/SEIS* increases the amount of expensive lodging units while decreasing the number of affordable overnight accommodations. The decrease in the number of campsites and tent cabins limits the affordability of overnight stays for low- and middle-income people, these people claim. Consequently, these respondents request the National Park Service to provide a sufficient number of affordable overnight accommodations. Other people believe that current rules allow retired people and wealthier visitors to unfairly book overnight accommodations for long periods of time, thus limiting the availability of these accommodations to others. These respondents recommend limiting the length of overnight visitor stays in Yosemite Valley.

As with individuals who address affordability, a few respondents focus specifically on campground and tent cabin accommodations in Yosemite Valley. The data presented in the *Draft Yosemite Valley Plan/SEIS*, claims one person, “deceptively minimizes the overall loss of [these] lower cost accommodations.” Such respondents insist that the *Final Yosemite Valley Plan/SEIS* include the pre-flood numbers of campground and tent cabin sites to provide a clear assessment of changes in the numbers these units. Addressing two specific types of overnight accommodations, other people contend that campground and tent cabin accommodations units require fewer employees to operate. The National Park Service plans include more of these accommodations, these individuals recommend.

Note: One response is provided for concerns #21 and #109, and is placed following concern #109.

21. Public Concern: The *Yosemite Valley Plan* should emphasize overnight accommodations in Yosemite Valley.

“I believe to truly enjoy the Yosemite experience it requires an overnight stay. On a day trip you cannot enjoy the quiet wonder of the early morning or evening. Therefore retaining lodging and camping facilities is essential. I don’t believe facilities should be reduced further.” (Individual, Roseville, CA - #30015)

“We would like to see an increase in the amount of camping and lodging proposed, but not the full extent shown in other alternatives. We believe that the Park must be experienced close up, and this requires time. Therefore more preference should be given to the overnight visitor than the casual tourist.” (Individual, San Jose, CA - #139)

“To appreciate the stunning experience of Yosemite Valley requires an overnight stay at least. To remove 279 units of lodging and camping is much too restrictive, and will make reservations frustrating and impossible to obtain.” (Individual, Sunnyvale, CA - #23)



“The plan seems to emphasize dealing with the traffic and associated problems from people who are only one-day visitors. Over the last 45 years, all of my visits to Yosemite Valley have been at least for two nights and more typically a week or two at a time. The Plan should ensure that visitors are encouraged to stay and enjoy the experience fully. By reducing the opportunity to drive while increasing the opportunity to hike or bicycle, there needs to be more opportunity for people of all means to stay overnight or longer in order to take advantage of the more leisurely pace of transportation.” (Individual, CA - #234)

Response: See response following concern #109 below.

109. Public Concern: The *Yosemite Valley Plan* should limit the number of overnight accommodations in Yosemite Valley.

“I’m okay with limiting the number of campsites and lodging units. This will help reduce the crowded feeling during peak times.” (Individual, Gilroy, CA - #388)

“I believe that if it’s good public policy to reduce the carrying capacity in terms of lodging in the Valley that the pain should be shared equally among the campgrounds, the Housekeeping cabins, the Curry Village, the Yosemite Lodge, and even the iconic Ahwahnee Hotel, which personally I don’t think typifies letting natural processes prevail.” (Public Hearing, Los Angeles, CA - #20355)

Response: With increasingly available rapid transportation and the development of recreation, lodging, and camping facilities in gateway communities, visitors are no longer dependent on overnight accommodations (camping and lodging) within Yosemite Valley during a visit to Yosemite National Park. Nonetheless, the National Park Service recognizes that there is great value in being able to experience the Valley in the evening, night, and early morning, and overnight accommodations facilitate this special experience for park visitors. Determining the appropriate amount and types of overnight accommodations to provide a quality visitor experience remains a challenging issue.

Target numbers of campsites and lodging units were established through a public process in the 1980 *General Management Plan*. The number of lodging units was further refined in the 1992 *Concession Services Plan*. The *Final Yosemite Valley Plan/SEIS* also proposes to modify the number of campsites and lodging units in an effort to improve the quality of visitor experiences while protecting and preserving resources for future generations. Decisions on the number and type of visitor accommodations must be based on resource and site condition. These conditions include floodplains and geological hazard areas (see Vol. IA, Chapter 2, Alternatives, Developing a Range of Alternatives—Development Considerations), as well as the quality of the overnight experience and how closely it relates to the park and the immediate environment. The Preferred Alternative reduces lodging from 1,260 to 961 units and increases camping from 475 to 500.

A range of approaches to resolving this issue can be found in the alternatives in the *Final Yosemite Valley Plan/SEIS*. Based on the diversity of public comments received on the *Draft Yosemite Valley Plan/SEIS*, the Preferred Alternative would provide for overnight experiences that allow more direct access to and connection with park resources, thereby enhancing each visitor’s overall park experience.

This response also applies to concern #21.

(Also see response to concern #234.)

132. Public Concern: The National Park Service should re-evaluate the connections between traffic congestion and the amount of overnight accommodations in Yosemite Valley.

“Each of the action alternatives need to distinguish, and address separately, traffic-related issues and lodging related issues. No one can deny that reducing vehicular traffic in the Valley is desirable, but I do not believe that the reduction in the number of cars and car trips needs to be directly tied to a reduction in the amount of available lodging--an association which all of the action alternatives seem to make to some degree.” (Individual, Mill Valley, CA - #223)

“The belief has long been held as ‘conventional wisdom’ that the only way to reduce the traffic congestion and related problems in the valley was to reduce the number of Valley visitors and their vehicles, by reducing the number of campsite and lodging units. This view, promoted in part by those who would like to see the Valley almost completely devoid of any ‘modern civilization,’ is not necessarily true. It may in fact be true, but this will not be proven until all other less radical plans for reducing the vehicular traffic and crowd concentrations are put to the test, and their results analyzed.” (Individual, American Canyon, CA - #907)

Response: Changes in lodging and camping facilities in the *Final Yosemite Valley Plan/SEIS* alternatives were developed in response to resource preservation goals and visitor safety (see Vol. IA, Chapter 2, Alternatives, Development Considerations, and Resource Stewardship). Changes in facilities for overnight visitors were not proposed for the purpose of reducing traffic congestion. Each action alternative sought to provide an appropriate number and range of overnight facilities consistent with resource protection and restoration goals. The resulting traffic and parking demand from overnight facilities is accounted for in the evaluation of transportation consequences of the alternatives. The relative contribution of day visitors and overnight visitors to traffic volume and parking demand is documented in Vol. IA, Chapter 3, Affected Environment, of the *Final Yosemite Valley Plan/SEIS*. (Also see response to concern #21.)

83. Public Concern: The National Park Service should emphasize affordability of overnight accommodations in the *Yosemite Valley Plan*.

“You’re planning to tear down the cabins to build a RV park? It seems the accommodations that will be left will be the expensive hotels, campsites and RV sites. What about the middle income people who aren’t campers and cannot afford the expensive hotels? Where will they be able to stay, only outside the park? I am a middle income taxpayer. I’ve been to Yosemite, and I know the only affordable place to stay are the cabins. And they are the best place to stay. It’s the only place where it’s quiet and peaceful in the valley. . . You must provide affordable accommodations to middle income, non-camper taxpayers, but not only the option of staying in a hotel with thousands of tourists.” (Individual, No Address - #30208)

“Don’t make the valley off limits to people who want to camp and price young families and older folks out. If you eliminate so many units from housekeeping and have already eliminated the River campsites--then where are these families supposed to go? And don’t say the Curry tents—they still have to eat out, which is quite prohibitive.” (Individual, Saratoga, CA - #331)

“It seems inappropriate to maintain the most expensive and luxurious lodgings at the Ahwahnee and Yosemite Lodge while removing low cost lodging.” (Individual, Oxnard, CA - #203)

“The number of proposed accommodations in the Overnight Lodging part of the plan is too high on the mid-scale range. We do not support any additional construction of units in that category. A few additional units in the economy category should suffice.” (Individual, San Rafael, CA - #5640)

“We are concerned with any plan which decreases the existing level of campsites or tent cabin sites in the valley. We are opposed to the plan to increase the level of higher rate accommodations and decrease the level of lower cost accommodations.” (Individual, No Address - #6842)

Response: The *Final Yosemite Valley Plan/SEIS* has been amended in response to concerns that new lodgings would not provide quality, resource-related experiences and that mostly low-priced accommodations were being affected. Under the Preferred Alternative, and compared with the *Draft Yosemite Valley Plan/SEIS*, campsites would be increased by about 8%, rustic accommodations by 35%, and economy level accommodations by 12%. In the Preferred Alternative, 81% of all overnight accommodations (camping and lodging) in the Valley would be priced at the economy level or below (compared to 78% of existing accommodations); 53% would be priced at the rustic level or below. The mix of accommodations proposed maintains a range of overnight opportunities, from camping to rustic Housekeeping units to economy, mid-range, and deluxe lodging facilities. The Preferred Alternative of the *Final Yosemite Valley Plan/SEIS* would establish several new campgrounds and the lodging facilities



developed would emphasize connection to park resources, economy level cost, and year-round function. (Also see response to concerns # 21, # 70, # 73, and # 117.)

663. Public Concern: The *Yosemite Valley Plan* should limit the length of stays at overnight accommodations in Yosemite Valley.

“If there are time limits for the number of days stayed within the Park, then they should be fairly applied to all levels of accommodations. Develop methods to limit the current unfairly long stays within the Park of retired people and those of means. This would immediately open up overnight accommodations to more different people.” (Individual, No Address - #4291)

Response: This concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan*. Currently, there are limits for stays in overnight accommodations in Yosemite National Park.

341. Public Concern: The *Yosemite Valley Plan* should include the pre-flood numbers of camp and tent cabin sites.

“There is no clear reply to the concerns about the reduction of the number of campsites and tent cabins relative to the hard-edged and more costly hotel rooms. See part III, p. 71 and also part 2, p. 32. What numbers are given are given in a deceptive way. The document compares the proposed numbers to the ‘present’ numbers of camp and tent cabin sites. But many campsites and tent cabin sites were ruined in recent floods. Not giving any pre-flood numbers deceptively minimizes the dramatic overall loss of lower cost accommodations relative to proposed hotel/motel facilities.” (Individual, Menlo Park, CA - #3564)

Response: Legal requirements of the National Environmental Policy Act and the Council on Environmental Quality provide that an Environmental Impact Statement include a No Action Alternative that represents the present condition in order to establish a baseline for comparison. Recognizing that many Yosemite National Park visitors might consider the number of accommodations existing prior to January 1997 as a baseline, and not being able to include this number in the No Action Alternative, the difference between pre-flood accommodations and accommodations proposed in each action alternative has been discussed in Vol. IB, Chapter 4, Environmental Consequences, Visitor Experience—Cumulative Impacts—Visitor Services. These numbers were also illustrated in exhibits presented during *Yosemite Valley Plan* public meetings (held during the public comment period).

665. Public Concern: The *Yosemite Valley Plan* should emphasize accommodations with minimal service and maintenance requirements in Yosemite Valley.

“Another approach to mitigating employee impacts is to reduce the ratio of employees to visitors. This is all the more important because transit workers are going to drive this ratio the wrong way. It is evident from Table III-16 of the Draft Merced River Plan that Housekeeping requires the smallest ratio of employees to lodging units, even though these units likely have the highest number of guests/unit. Campsites, with their even lower levels of service, must have even lower ratios. Thus reducing the number of Housekeeping units or campsites tends to increase the impact on the employees relative to visitors.” (Individual, Oakland, CA - #3835)

Response: Target numbers of campsites and lodging units were established through a public process in the 1980 *General Management Plan*. The numbers of lodging units were further refined in the 1992 *Concession Services Plan*. The *Final Yosemite Valley Plan/SEIS* also proposes to vary the number of campsites and lodging units in an effort to improve the quality of visitor experiences while protecting and preserving resources for future generations. Decisions on the number and type of visitor accommodations must be based on resource and site condition. These conditions include floodplains and geological hazard areas (see Vol. IA, Chapter 2, Alternatives, Developing a Range of Alternatives—Development Considerations), as well as the quality of the overnight experience and how closely it relates to the park and the immediate environment.

A range of approaches to resolving this issue can be found in the alternatives in the *Final Yosemite Valley Plan/SEIS*. Based on the diversity of public comments received on the *Draft Yosemite Valley Plan/SEIS*, the Preferred Alternative would provide overnight experiences that allow more direct access to and connection with park resources, thereby enhancing each visitor's overall park experience. Providing diverse overnight accommodations would require varying employee/visitor ratios.

4.12.2 ~ Campground Management

Comments on campground management pervade many responses commenting on the *Yosemite Valley Plan* and cover a wide range of topics. Concerns expressed in this section are grouped into several categories: general management direction, number of campsites, location of campsites, relationship of campground types, drive-in campsites, recreational vehicle campsites, walk-in campgrounds, and group campgrounds.

4.12.2.a ~ General Management Direction

Public comment analyzed in this section includes concerns related to campground reservations and occupancy, as well as disparate concerns on campfires, campground classification, amenities, maintenance, and law enforcement.

Many respondents express concern with the difficulty of securing camping reservations in Yosemite Valley. Limiting the time for establishing reservations to one day a month is a major source of problems, most of these people contend. Many such individuals suggest that the National Park Service return to the former system of establishing reservations. This method would stagger reservation requests and relieve the pressure on the phone-in reservation system, these people contend. Other individuals feel that the National Park Service should limit the length of stay in campgrounds to allow more visitors to enjoy the camping experience.

Expressing apprehension that a reservation system will be applied to all campsites in Yosemite Valley, a few respondents recommend that some campgrounds operate on a first-come, first-served basis. In contrast, other people express strong support for reservation campgrounds, with one individual indicating that without reservations their family could not visit Yosemite Valley.

The use of campfires in Yosemite Valley is a concern for many respondents. Impacts on air quality and illegal wood gathering are most often cited by critics of campfires as the reason to ban such activities. While most respondents concerned with campfire impacts recommend an outright ban, a few others suggest mitigation measures such as time constraints or decreasing the number of fire rings in campgrounds.

A few unrelated camping concerns round out this section. One individual contends that campgrounds are "are busy at all times of the day," and recommends that the National Park Service classify these facilities as Standard Occupancy Facilities instead of Miscellaneous Structures. Some respondents think the National Park Service should employ a rotation system to restore campgrounds. These people believe such a system would allow for the retention of some campsites. Campground amenities are the focus of other respondents' comments. These people recommend locating stores, showers and other conveniences in or near campgrounds. Locating amenities conveniently for campers will help reduce automobile use in the Valley, these individuals contend. One individual recommends that the National Park Service maintain a continuous ranger presence in campgrounds.



739. Public Concern: The *Yosemite Valley Plan* should improve the campground reservation system for Yosemite Valley.

“Work on the reservation system. At the present time almost all of the summer months reservations are made on one day in April. At one time you called 8 weeks from the day you wanted to come, for one week. Now its 3 months, for the entire month. The previous system was a fairer and created fewer empty campsites.” (Individual, Reseda, CA - #4421)

ESTABLISH A STAGGERED RESERVATION SYSTEM

“I think it is very important to anybody camping in Yosemite National Park how the reservations are made. I don’t know if that’s considered in your plan or not, but in the past it was that you call eight weeks in advance of the day that you wanted to begin your camping, and thus it was staggered very nicely. Now, everybody literally in the entire world has to call on the 15th of the month, five months in advance of when you want to go camping. And unless you have all day to spend at the telephone trying to get through, you can’t get through. I’d like to see it go back to a staggered way to make reservations so that way people can plan. And if one day is not good, they can try again the next day and just move on. If one wants to start their camping experience on the 15th or 16th of the month, they have to wait a whole other month to start trying to call to make those reservations. But if one wants to start their camping reservation on the 14th, they can call a month earlier, and I don’t see where that’s of benefit. And I think it would help in the office where they take the reservations to have it staggered. I think it would be a lot more fair for people. I think they could make their plans easier.” (Public Hearing, San Diego, CA - #20432)

Response: This concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan*. However, the National Park Service takes this concern seriously and will continue to work with the contractor to improve the campground reservation system.

738. Public Concern: The *Yosemite Valley Plan* should limit the length of stays in Yosemite Valley campgrounds.

“Restrict camping in the valley to 3 nights per party per year! This will allow more people to enjoy the unique experience of camping in the Valley while still removing campgrounds.” (Individual, Berkeley, CA - #4699)

“I would support limiting camping to 4 days to accommodate more visitors if number of spaces is reduced.” (Individual, No Address - #6844)

Response: This concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan*. Currently, there are limits for stays in overnight accommodations in Yosemite National Park.

79. Public Concern: The *Yosemite Valley Plan* should provide for some first-come, first-served campgrounds in Yosemite Valley.

“Make available some campsites on a first-come, first served basis rather than having a reservations-only policy.” (Individual, Cupertino, CA - #253)

“We also want to ask specifically that you set aside a significant part of your campsite reservation system for those of us who are traveling on variable schedules and cannot easily try to reserve a site for specific dates, far ahead of time. We want to be able to at least have a shot at finding a non-reserved site available when we reach your area (even if it means having to learn the best days, times and ways to get ‘in line’ for scarce sites, try several times, etc.).” (Individual, Alexandria, VA - #1276)

Response: The *Final Yosemite Valley Plan/SEIS* proposes maintaining Camp 4 (Sunnyside Campground) as a first-come, first-served campground. However, depending on how the traveler information and traffic management system manages traffic entering the Valley, it may be necessary to register for these campsites at other park locations such as at visitor centers near park entrances.

592. Public Concern: The *Yosemite Valley Plan* should maintain a reservation system for campgrounds in Yosemite Valley.

“We have a three-year-old and we have camped with her in the Valley for the past three years. This was possible because we were able to have a reservation. This may sound obvious, but as responsible parents we could not subject our preschooler to a several hour drive only to discover that there was no place to sleep because the campground we’d hoped to use was full. Without a guaranteed reservation, we could not visit the Valley.” (Individual, Santa Rosa, CA - #8917)

Response: The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* has assumed the continuation of a reservation system for Yosemite Valley campgrounds.

85. Public Concern: The *Yosemite Valley Plan* should restrict campfires in Yosemite Valley.

“I have concerns for campfires in the valley. My concern is two-fold. One, due to the physical essence of the valley, the smoke from the fires hangs low over the valley creating a smog, fouling the air that all visitors are breathing. Second, many of those making fires had not brought their own from outside the park as mandated by law but were collecting dead fall from the surrounding woods, as is known to be bad for the forest. For these reasons I propose banning all campfires within the Valley.” (Individual, No Address - #30205)

“Campers do have polluting campfires; however, campfires could be prohibited or restricted much of the time, or there could be just one fire ring for every 4-6 campsites.” (Individual, San Diego, CA - #3479)

Response: This concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan*. Vol. IA, Chapter 3, Affected Environment, Air Quality, in the *Final Yosemite Valley Plan/SEIS*, identifies campfires as sources of particulate matter, carbon monoxide, and volatile organic compounds in the Valley. The park has recognized that campfires make significant contributions to air pollution in the Valley and has taken measures to reduce their impact. For example, campfires are permitted only from 5:00 P.M. until 10:00 P.M. from May 1 to October 15, and campfires are permitted only in established fire rings. Collection of firewood, including “dead and down” wood, is prohibited in the Valley, as is cutting live or dead trees and attached limbs. These rules are widely disseminated to park visitors through the park’s newspaper (*Yosemite Guide*), web site (www.nps.gov/yose/), and other media.

451. Public Concern: The *Yosemite Valley Plan* should categorize campgrounds as standard occupancy facilities.

“We question the categorization of campgrounds as ‘Miscellaneous Structures’ (Appendix C). Although not occupied to capacity for parts of the year, campgrounds typically are busy at all times of the day and are probably better categorized as ‘Standard Occupancy Facilities.’” (Governor’s Office of Planning and Research, Sacramento, CA - #6584)

Response: Geologic hazards guidelines (See Vol. II, Appendix C of the *Final Yosemite Valley Plan/SEIS*) categorize campgrounds as miscellaneous rather than standard, occupancy facilities based on the low density of occupants, the open nature of campgrounds, and the minimal occupancy of campground structures. Miscellaneous facilities require site-specific evaluations of safety and hazard considerations and may be newly placed in the Talus Zone only if there is no practicable alternative.

237. Public Concern: The National Park Service should consider a rotation system for restoration of campgrounds in Yosemite Valley.

“I would not object to a rotation system that would permit one closed campground area at a time to allow time for restorations of the undergrowth. At such times the campground is reopened the area surrounding the campsite [will] be partitioned off with restricted access to restrooms, etc., much like meadow restoration.” (Individual, South Pasadena, CA - #1734)



“Since the flood of 1997 it is more difficult to obtain camping reservations since there are less campgrounds. The elimination of North Pines would make it even worse. A rotation of campgrounds might be a better solution if natural reclamation is the desired result.” (Individual, Calabasas, CA - #30233)

Response: Campground development and maintenance includes installation of permanent infrastructure, including restrooms and asphalt (to prevent development of rutted roads and high levels of dust) and temporary features such as grills and tables that negate the potential for ecological restoration of a site. High levels of human use of these areas results in a variety of long-term impacts that would not be mitigated by short rest and rotation periods. These include soil compaction, loss of nutrients through removal of woody debris, loss of soil infiltration capabilities, and alterations in hydrology from surface impacts. Impacts to subsurface flows also are caused by the damming effects of utilities and road base. There are permanent impacts to overstory trees because of these soil and hydrologic changes, which include the loss of overstory vigor and loss of seed-producing vegetation. This lack of regeneration of slow-growing shrub and tree species with eventual loss of mid- and upper-level canopies over time and encroachment by non-native species due to lack of natural ground cover results in a permanent decline in the condition of the site. Loss of natural hydrology, fire patterns, and other natural processes also reduces the capability of an impacted area to provide habitat for wildlife. It generally takes years for a site to recover to the point where it functions naturally and provides habitat. This recovery process is generally assisted through soil decompaction, weeding, revegetation, and the removal of structures and facilities. Rotational restoration would not achieve the goals of the *General Management Plan*. It would require more campgrounds resulting in larger areas of impact and development than proposed in any of the action alternatives in the *Final Yosemite Valley Plan/SEIS*.

206. Public Concern: The *Yosemite Valley Plan* should require that visitor amenities be located conveniently for campground users in Yosemite Valley.

“An ice machine at the entrance to the campgrounds would drastically reduce the traffic. The campers can use the bus to go to the grocery store or a bicycle but not to bring back ice. A return of a convenience store [in] a place closer to the campgrounds would again reduce traffic.” (Individual, North Highlands, CA - #219)

“I think you can put block-ice machines and showers in the campgrounds, that will eliminate the need for people to get in the cars and drive down to Curry Village and buy block[s] of ice and to take the kids for showers. Upgrading the campgrounds rather than limiting them is something that we all should be striving for. Camping is an incredible experience in Yosemite; it’s one that I’ve been doing for more than 20 years. And I think block-ice machines, showers in the campgrounds, and expanding the number of campsites, not fewer campsites.” (Public Hearing, Costa Mesa, CA - #20301)

SHOWERS

“Construct showers in the campgrounds.” (Conservation Organization, Camarillo, CA - #2627)

“There are only two locations in the Valley for campers to shower. Curry Village and Housekeeping. At least those two locations need to be kept.” (Individual, Exeter, CA - #2309)

Response: The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* proposes that the camp store would be located at Curry Village, but an ice machine could be located near the centralized check-in facility or shower buildings. This level of detail would be considered during the final campground design. (Also see response to concern #402.)

152. Public Concern: The National Park Service should maintain a continuous ranger presence in Yosemite Valley campgrounds.

“I think that they should have a ranger in the camping grounds 24 hours a day, 7 days a week.” (Individual, Henderson, NV - #1244)

Response: This concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan*. The staffing of campgrounds is an operational issue. Each year Yosemite National Park undergoes a park management priority setting process. Based on yearly priorities, a budget is established for each program area. It is not possible to fund all programs annually without an increase to the park's annual operational budget.

4.12.2.b ~ Number of Campsites

Many of the respondents addressing campground concerns contend the number of campsites proposed in the Preferred Alternative of the *Draft Yosemite Valley Plan/SEIS* is inadequate. As with other types of overnight accommodations, the relationship between affordable accommodations and equal access is a key theme in comments regarding camping. Many individuals feel the *Draft Yosemite Valley Plan/SEIS* caters to more affluent visitors. Reducing the number of campsites will make a trip to Yosemite National Park less affordable and eliminate some low-income visitors, these people assert. One person more specifically claims that, "The low-income citizens are under represented . . . ! More campsites are an obvious need to equalize this disparity."

Some critics of the *Draft Yosemite Valley Plan/SEIS* cite other reasons for believing that the proposed number of campsites is insufficient. Campers have less impact on park resources than other visitor types, many individuals claim. Others contend that campers use their automobiles less than other visitors, while some believe that campground facilities have less environmental impact than other lodging facilities do.

Advocates of providing more campsites than proposed in the draft plan offer several suggestions for improvement. These camping proponents urge the National Park Service to adopt a variety of measures: establish additional campsites in Yosemite Valley; retain the number of sites proposed in Alternative Five; retain existing campsites; and replace campsites lost to flooding.

Highlighting a related concern, several respondents feel that the *Final Yosemite Valley Plan/SEIS* should include the pre-flood number of campsites as the figure with which the proposed number of campsites is compared. The plan's comparison of proposed campsites to currently existing sites does not adequately reflect the proposal's impact, these individuals believe. In addition, some of these people think the draft plan's comparison is an attempt by the National Park Service to mislead the public about the impact of this proposal on camping.

In contrast to those advocating increased camping opportunities, a few respondents support a reduction in the number of campsites in Yosemite Valley. Some of these campground critics feel reductions beyond those called for in the *Draft Yosemite Valley Plan/SEIS* are appropriate, even to the extent of eliminating all Valley campsites. More moderately, other respondents suggest that campsites eliminated by flooding not be replaced.

Note: One response is provided for concerns #13, #734, and #735, and is placed following concern #735.

13. Public Concern: The *Yosemite Valley Plan* should establish additional campsites in Yosemite Valley.

"Your stats show that 26% of the visitors earn more than \$100,000 and that 5% of the visitors earn less than \$20,000. Also, those earning less than \$20,000 in California number 37%. The lower income citizens are under represented . . . ! More campsites are an obvious need to equalize this disparity. For years we camped and without



camping we wouldn't have had a vacation. This is a National Park for all people, not just the affluent." (Individual, Ahwahnee, CA - #329)

"The need for more campsites is tremendous. If lodging is cut from 1260 to 981, there should be an additional 280 campsites added to the 756 figure to reach the GMP level of overnight visitors, for a total of 1036 campsites. I don't think that a campground is really a development that matters whether it is put in the path of a 100 year flood. Just place the bathrooms as far from the river as possible, and turn off the plumbing and electricity for a few days each century." (Individual, San Diego, CA - #3479)

ESTABLISH NUMBER OF CAMPSITES PROPOSED IN ALTERNATIVE FIVE

"More campsites are needed, at least as many as in Alternative #5! Perhaps the prized river-edge spaces must be pushed back from the water, but more spaces can certainly be added." (Individual, Long Beach, CA - #5644)

Response: See response following concern #735 below.

734. Public Concern: The *Yosemite Valley Plan* should retain existing campsites in Yosemite Valley.

"I am appalled and dismayed at the proposal to cut back the number of campgrounds by 42% . . . Why is it that it's always the low cost affordable alternatives for the American people that are the first to get axed? I'm sure the founder of the National Park System, the great Theodore Roosevelt would also be upset and dismayed at this type of class elitism exemplified by the Interior Secretary's plan, for surely by cutting the number of campgrounds while retaining the number of hotel rooms in the Ahwahnee and Yosemite Lodge will only make the park less accessible to average American citizens while retaining the it's accessibility for the wealthier in our society as well as the wealthier from other nations." (Individual, San Jose, CA - #199)

"Please keep the campgrounds. Our family has been camping for 50 years. We would like to pass on this tradition generation to generation!" (Individual, Torrance, CA - #40)

"I'm sad to see a reduced number of campsites offered. I believe that campers are the visitors most likely to stay out of their cars during their stay. We always bring our bikes and hiking shoes, and make it a policy to leave the car parked for the whole week." (Individual, Santa Barbara, CA - #85)

"The . . . large change I find objectionable is the elimination of some forty-two percent of the camping sites in the Valley. Why pick on the campers? Campers have a relatively light impact on the local environment, especially when compared to the infrastructure and staffing required by hotel guests." (Individual, San Carlos, CA - #99)

"We just spent a week at Hodgdon Meadow campground and wished we had been in the Valley because we spent so much time commuting down into it. We really would not like to see any more campgrounds taken away because of this driving aspect." (Individual, No Address - #9015)

Response: See response following concern #735 below.

735. Public Concern: The *Yosemite Valley Plan* should replace campsites lost to flooding in Yosemite Valley.

"Campgrounds provide the best way for serving visitors because they have the least overall impact and cost even less. The number of spaces in campgrounds in Yosemite Valley should be returned to the levels available before the 1997 flood, though not necessarily in the same places (sensitive habitat should be avoided). The number of spaces should be returned to the range of 600-800 sites." (Conservation Organization, Fresno, CA - #7881)

"It would be good if more campsites could be added to replace at least some of the ones lost due to flooding." (Individual, No Address - #531)

Response: The number of campsites in Yosemite Valley has been a major concern throughout this planning process, as the National Park Service is challenged to determine an "adequate" number of

campsites. Within the narrow Valley, visitor accommodations cannot be provided merely on the basis of visitor demand but must be located and designed in consideration of safety constraints (floodplain and rockfall) and, particularly, of highly valued resources (see Vol. IA, Chapter 2, Alternatives, Developing a Range of Alternatives—Development Considerations, and Resource Stewardship—Highly Valued Resources, in the *Final Yosemite Valley Plan/SEIS*). The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* has identified those highly valued resource areas, and proposes locating visitor accommodations outside of these areas as much as possible. Those areas in Yosemite Valley suitable for visitor accommodations are few, and within that small space, the Preferred Alternative proposes a variety of overnight accommodations, including various camping options and lodging accommodations ranging from rustic to deluxe. The greatest number of these accommodations is at the lower end of the cost spectrum.

In consideration of public comments under the Preferred Alternative, the proposed number of campsites in Yosemite Valley has been increased from 465 in the *Draft Yosemite Valley Plan/SEIS* to 500 in the *Final Yosemite Valley Plan/SEIS*. While park-use statistics suggest that low-income visitors are underrepresented in the park, this is not necessarily because they are not able to find low-cost accommodations. Low-income visitors have the same opportunity to secure economical overnight space in Yosemite Valley as do visitors with higher incomes, yet their proportions remain low even in the campgrounds and rustic lodgings. Historically, demand for camping and lodging of all types within the Valley has exceeded the available number of accommodations. Given the limits imposed by a sensitive and confined area, it is important to understand that a quality Yosemite Valley experience may be had in a variety of ways, including: in the off-season, as a day visitor, staying in accommodations (either camping or lodging) outside Yosemite Valley but still in Yosemite National Park, or by staying in communities outside the park. Considering the increasing population and long-term visitation trends, it is unlikely that the National Park Service would ever be able to provide enough camping in Yosemite Valley to meet the demand.

(This response also applies to concerns #13 and #734.)

736. Public Concern: The *Yosemite Valley Plan* should compare proposed campsite numbers to pre-flood campsite numbers in Yosemite Valley.

“There’s also no clear reply in any of those documents to many people’s concerns about the number of campsites. First of all the numbers were massaged; the numbers that were given in the summary are the present numbers, which doesn’t account for all the washed out and destroyed campsites so that the net number of lost campsites is not clear.” (Public Hearing, San Jose, CA - #20532)

“Alternative 2 claims to keep the number of campsites at about their current number, but this is really disingenuous, because, as a matter of fact, the Park has eliminated hundreds of campsites over the past two years. This means that under this alternative, there will be far fewer campsites than was the case before the flood of ‘97.” (Individual, No Address - #6871)

Response: Legal requirements of the National Environmental Policy Act and the Council on Environmental Quality provide that an Environmental Impact Statement include a No Action Alternative that represents the present condition in order to establish a baseline for comparison. Recognizing that many Yosemite National Park visitors might consider the number of accommodations existing prior to January 1997 as a baseline, and not being able to include this number in the No Action Alternative, the difference between pre-flood accommodations and accommodations proposed in each action alternative has been discussed in Vol. IB, Chapter 4, Environmental Consequences, Visitor Experience—Cumulative Impacts—Visitor Services. These numbers were also illustrated in exhibits presented during *Yosemite Valley Plan* public meetings (held during the public comment period).



659. Public Concern: The *Yosemite Valley Plan* should reduce the number of campsites in Yosemite Valley.

“Greatly reduce Valley floor camping sites. I would prefer to see these spots reduced even more than in the proposed plans. I even support removing all Valley floor camping sites.” (Individual, Atherton, CA - #3798)

Response: With increasingly available regional transportation and the development of recreation, lodging, and camping facilities in gateway communities, visitors are no longer dependent on overnight accommodations (camping and lodging) within Yosemite Valley during a visit to Yosemite National Park. Nonetheless, the National Park Service recognizes that there is great value in being able to experience the Valley in the evening, night, and early morning, and overnight accommodations facilitate this special experience for park visitors. Determining the appropriate amount and types of overnight accommodations to provide a quality visitor experience remains a challenging issue.

Target numbers of campsites and lodging units were established through a public process in the 1980 *General Management Plan*. The number of lodging units were further refined in the 1992 *Concession Services Plan*. The *Final Yosemite Valley Plan/SEIS* also proposes to vary the number of campsites and lodging units in an effort to improve the quality of visitor experiences while protecting and preserving resources for future generations. Decisions on the number and type of visitor accommodations must be based on resource and site condition. These conditions include floodplains and geological hazard areas (see Vol. IA, Chapter 2, Alternatives, Developing a Range of Alternatives—Development Considerations), as well as the quality of the overnight experience and how closely it relates to the park and the immediate environment.

A range of approaches to resolving this issue can be found in the alternatives in the *Final Yosemite Valley Plan/SEIS*. Based on the diversity of public comments received on the *Draft Yosemite Valley Plan/SEIS*, the Preferred Alternative would provide for overnight experiences that allow more direct access to and connection with park resources, thereby enhancing each visitor’s overall park experience.

658. Public Concern: The *Yosemite Valley Plan* should not replace campsites lost to flooding in Yosemite Valley.

“We don’t need to rebuild the destroyed and flooded campgrounds.” (Individual, No Address - #7653)

Response: Prior to the January 1997 flood, Yosemite National Park published a draft *Valley Implementation Plan/EIS*. That document included a proposal to remove facilities out of the Merced River floodplain. After the 1997 flood, the National Park Service consolidated this and other draft compliance documents into the *Draft and Final Yosemite Valley Plan/SEIS*. The *Final Yosemite Valley Plan/SEIS* considers the facilities that were lost in the 1997 flood, as well as new knowledge about highly valued resources, the Merced Wild and Scenic River, and rockfall hazards. The National Park Service is using information learned from the extent of the flood to better locate development in the Valley. The proposed action and other alternatives presented in the *Final Yosemite Valley Plan/SEIS* propose relocating facilities to areas less prone to severe flooding and other hazards. Executive Order 11988 restricts development within floodplains, and park policy mandates that development within areas of fast-moving, high-energy floodwater be limited to day uses.

The 1980 *General Management Plan* called for the relocation or removal of many of these facilities to restore and protect natural processes of the Valley including natural flood cycles, dynamic channel shifts, and interconnection of groundwater and surface water systems. Generally, in acknowledging Wild and Scenic River protection values, highly valued resources, and floodplain considerations, campsites lost to flooding would not be replaced under the *Final Yosemite Valley Plan/SEIS*.

(Also see response to concern #13.)

4.12.2.c ~ Location of Campgrounds

Comments regarding campground location are expressed by some respondents who comment on the *Draft Yosemite Valley Plan/SEIS*. Many of these people express concerns regarding the impact of campgrounds on sensitive areas. Citing ecological restoration as the most important issue, one organization feels that campgrounds should be removed from sensitive areas, such as the Merced River floodplain. Other respondents, however, feel that campsites near the Merced River should not be eliminated. They contend that campsites located near the river are a desirable part of their camping experience. Other advocates of riverside camping argue that flooding only impacts campsites seasonally, and therefore campsites in the floodplain could be used during the appropriate seasons.

Offering an alternative management direction, several people recommend establishing additional campsites outside Yosemite Valley. Additional out-of-Valley campsites would help alleviate Valley congestion, encourage visitors to explore other areas of the park, and offset the loss campsites in the Valley, they claim. Some specific suggestions offered by these individuals include replacing all campsites eliminated in the Valley with out-of-Valley sites, establishing campsites along Tioga Pass and Glacier Point roads, and developing winter campsites in El Portal.

655. Public Concern: The *Yosemite Valley Plan* should eliminate campgrounds in sensitive areas.

“Ecological restoration is the single most important substantive issue in the draft YVP. Despite the loss of campgrounds, we support the Park Service’s decision not to rebuild the former Upper and Lower River Campgrounds, as well as North Pines and portions of Lower Pines Campgrounds. We strongly believe the Merced River should be given space to naturally meander and reshape itself over time, allowing for the restoration of riparian, wetland, meadow, and aquatic communities within the Sierra Nevada. We applaud the Park Service for beginning to change that.” (Conservation Organization, San Francisco, CA - #4594)

Response: The two primary purposes for Yosemite National Park are to preserve the resources that contribute to Yosemite's splendor and uniqueness, and make the varied resources of Yosemite available to people for their enjoyment, education, and recreation, now and in the future. The *Final Yosemite Valley Plan/SEIS* has identified meadows, riparian areas, and California black oak woodlands as highly valued resources, and as such, they would receive the highest priority for protection and restoration. The document also calls for the restoration of natural water flow patterns through removal or modification of campgrounds, roads, paved paths, and parking lots. These actions are intended to emphasize the defragmentation and restoration of vegetation and sensitive habitats through the center of Yosemite Valley, as well as to improve overall ecosystem function of the Valley. These treatments are proposed to varying degrees in each of the action alternatives, with consequences outlined in Vol. IB, Chapter 4 of the *Final Yosemite Valley Plan/SEIS*.

662. Public Concern: The *Yosemite Valley Plan* should retain campsites located next to the Merced River.

“Please give us campers our river sites and river access back. Don’t go through with the 150’ set backs and heavy vegetation as described in volume 1A page 2-69 under the heading ‘camping.’ Please give us back our campsites and more free access to the river and a camping experience.” (Individual, No Address - #6473)

Response: As required by the *Merced River Plan/FEIS*, the River Protection Overlay requiring a setback of 150 feet from normal high water for most development in Yosemite Valley is being implemented in the *Final Yosemite Valley Plan/SEIS*. This is for the purposes described in Vol. IA, Chapter 2, Alternatives, Actions Common to All Alternatives—Implementation of the River Protection Overlay.



205. Public Concern: The National Park Service should consider establishing campgrounds within the Yosemite Valley floodplain for seasonal use.

“We were in Lower River in the flood (May) of 1996. My husband drove people’s motor homes out for them and we helped folks dry out in the auditorium. The river campgrounds could still be used in July and August and Sept. without concern.” (Individual, Rancho Palos Verdes, CA - #62)

Response: The *Final Yosemite Valley Plan/SEIS* does call for some campsites within the 100-year floodplain. These campsites may be inaccessible during seasonal periods of high water. The Preferred Alternative avoids locating campsites in particular areas of the floodplain because of potential severe and dangerous flooding and impacts to highly valued resource areas (e.g., meadows, California black oak woodlands, and riparian communities) and the River Protection Overlay prescribed in the *Merced River Plan/FEIS*. (See Vol. IA, Chapter 2, Alternatives, Developing a Range of Alternatives—Development Considerations; Resource Stewardship—Highly Valued Resources; and Actions Common to All Alternatives—Implementation of the River Protection Overlay.)

26. Public Concern: The *Yosemite Valley Plan* should increase camping opportunities outside Yosemite Valley.

“Each time I respond to proposed changes I mention expanding camping areas outside the Valley. Many people have no idea that Yosemite is much more than the Valley. . . It seems that developing areas for campers outside of the Valley would allow people to experience other parts of Yosemite and reduce congestion.” (Individual, Roseville, CA - #341)

MITIGATE FOR SITES ELIMINATED IN YOSEMITE VALLEY

“If you decrease the number of campsites in the Valley by 42% then why not increase by 42% the campgrounds in the other existing campgrounds of the Park such as Tuolumne Meadows or Wawona, or even select new areas for additional campgrounds where environmental impact would be minimal? The 1997 flood has provided the opportunity to restore the valley floor, not by eliminating campgrounds altogether, but by rebuilding them and redistributing them elsewhere in the park. This would ensure Teddy Roosevelt’s plan that the National Park’s be a refuge accessible to all Americans, not just the wealthier ones.” (Individual, San Jose, CA - #199)

ESTABLISH CAMPSITES ALONG TIOGA PASS AND GLACIER POINT ROADS

“We strongly recommend the development of new campgrounds along the Tioga and Glacier Point roads. This will help reduce Valley congestion while providing alternative camping experiences.” (Individual, Santa Barbara, CA - #109)

ESTABLISH WINTER CAMPSITES IN EL PORTAL

“Winter camp sites could be located in El Portal.” (Individual, No Address - #4291)

Response: The *Final Yosemite Valley Plan/SEIS* is an implementation document for the park’s *General Management Plan* for the Valley area. But, adding campsites in other areas of the park (e.g., along Tioga Road and in Wawona) is beyond the scope of this planning effort. This is an important issue and one that would be evaluated seriously and thoroughly, but in the context of other site-specific planning. Planning for Wawona, the Tioga Road corridor, and other areas will be initiated in the future and this issue will be carried into these future efforts.

The *General Management Plan* recognized the need to remove campsites from the Valley and expand sites in other areas of the park.

4.12.2.d ~ Site-specific Management Direction

Many citizens comment on the campground proposals of the *Draft Yosemite Valley Plan/SEIS*. Most of these people argue for or against the retention of particular campgrounds or campsites proposed for elimination in the *Yosemite Valley Plan*. As with campgrounds in general, advocates of retaining certain campgrounds contend that sites should be maintained because they offer affordable accommodations and create less environmental impact than other forms of lodging. They also insist that these existing campgrounds are in desirable locations. The National Park Service should reopen Upper and Lower Rivers Campgrounds, and retain North Pines and Lower Pines Campgrounds, these constituents suggest. Conversely, a few individuals feel that rebuilding Upper and Lower Rivers Campgrounds would run counter to the park's restoration efforts. They oppose such actions. Commenting on an exception to the draft plan's overall pattern of reducing the number of campsites in existing campgrounds, one organization affirms its support for the plan's proposal to enlarge Camp 4 (Sunnyside Campground).

Comments on new campgrounds proposed in the *Draft Yosemite Valley Plan/SEIS* contain two discrete management recommendations. Contending that construction of the proposed Yellow Pine Campground in Foresta will increase traffic and harm the water quality of Crane Creek, some individuals oppose the establishment of this campground. Other people recommend the relocation of South Camp Campground to the North Pines Campground because, they claim, South Camp is in a potential rockslide zone.

Some individuals identify locations for new campgrounds in addition to those sites proposed in the *Draft Yosemite Valley Plan/SEIS*. One person suggests the placement of a new campground in Curry Orchard "in an effort to meet the [General Management Plan] goal for number of campsites in Yosemite Valley." Other locations for new campgrounds proposed by respondents include the concessioner stable area and the Mirror Lake area.

302. Public Concern: The *Yosemite Valley Plan* should require that the Lower and Upper River Campgrounds be reopened.

"I would like to see the camp sites of Lower and Upper River reopened and available to the public. They provide a very affordable, intimate, and low impact experience for the public. Even if they flood at times, maintenance work could easily restore these sites, as there are limited structures at these areas." (Individual, San Francisco, CA - #1791)

Response: The Upper and Lower River Campgrounds are located in a highly valued resource area. In the Preferred Alternative of the *Final Yosemite Valley Plan/SEIS*, the fill material added to this area to establish these campgrounds would be removed and the area would be restored to a mosaic of meadow, riparian, and oak woodland communities. The restoration of meadow communities also improves the cultural landscape.

(Also see response to concern #13.)

440. Public Concern: The *Yosemite Valley Plan* should retain North Pines Campground.

"North Pines should not be removed. It is a very enjoyable location for tent camping and offers various opportunities for small children to view and participate in what nature has to offer on the river without the crowds (at the other campgrounds)." (Individual, Torrance, CA - #3953)

Response: The North Pines Campground is proposed for removal under the Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* in order to restore the area to riparian and California black oak woodland habitat, which are highly valued resources.

(Also see response to concern #13.)



97. Public Concern: The *Yosemite Valley Plan* should retain the existing campsites located in the Lower Pines Campground.

“Campgrounds . . . they have been reduced drastically over the years. Back in the forties . . . a Ranger told me there were about a thousand families camping in Camp 14, now Lower Pines. I saw the campgrounds redefined as time went by until Lower Pines had about 200 sites . . . But now, after the flood, there are only about 65 . . . They are saying the rest are in the floodplain and can’t, by Executive Order, house overnight accommodations. This perspective also applies to the Rivers Campgrounds . . . Let’s make an exception. Aren’t over three hundred campsites serving thousands of visitors annually important enough to warrant special dispensation?” (Individual, Ahwahnee, CA - #329)

“I personally wish they would restore some of the beautiful campsites that were destroyed in the Lower Pines Campground by the ‘97 flood.” (Individual, No Address - #378)

Response: In response to public comments advocating additional campsites at Lower Pines Campground, the Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* proposes that 60 sites be retained in the Lower Pines Campground, rather than the 40 proposed in the *Draft Yosemite Valley Plan/SEIS*. (Also see response to concern #13.)

660. Public Concern: The *Yosemite Valley Plan* should not require that Upper River and Lower River Campgrounds be rebuilt.

“I do not think the Upper and Lower campgrounds should be rebuilt. I am sure there are reasons that I am not aware of for the adding and removing of campgrounds, but, if the other main issue with the park is to return it to nature, why would you be creating new campgrounds that would need water and sewer service?” (Individual, Rancho Santa Margarita, CA - #5646)

Response: Following the prescriptions within the *Merced River Plan/FEIS*, all action alternatives in the *Final Yosemite Valley Plan/SEIS* have been revised to propose that camping at the Lower River and Upper River Campgrounds not be retained. This area will be restored to natural conditions.

326. Public Concern: The *Yosemite Valley Plan* should require an increase in size of Camp 4 (Sunnyside Campground).

“The American Alpine Club supports these aspects of Alternative 2 and recommend that they be included in the final plan: Camp 4 is preserved and its size is increased.” (Conservation Organization, No Address - #20074)

Response: The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* proposes to increase the number of campsites at Camp 4 (Sunnyside Campground) by 28 sites.

25. Public Concern: The *Yosemite Valley Plan* should not require the construction of Yellow Pine Campground in Foresta.

“We oppose the construction of Yellow Pine Campground in Foresta. The Foresta residential area will be burdened enough by the increased traffic of the McCauley Ranch stables use and the 14 employee housing units. The addition of the campground on top of these new rules will further increase vehicular traffic, primarily transient in nature. The absence of a water supply at the campground will unfortunately result in campers using Crane Creek for drinking, cooking, and bathing to the detriment of the creek’s water quality and environs.” (Individual, Santa Barbara, CA - #109)

Response: Yellow Pine Campground was reopened to accommodate park volunteer groups displaced from Foresta following the 1990 A-Rock Fire. The campground called for in Foresta is a rebuilding of the group site that existed prior to the 1990 A-Rock Fire. It is for park volunteer groups only and not the general public; therefore, controls would be more easily applied. It is not development of a new site, but reopening of a previously used area.

207. Public Concern: The *Yosemite Valley Plan* should relocate the proposed South Camp campground to the North Pines Campground area.

“Location of South Camp—Due to rock slides in the Glacier Point area during the last 30 plus years (that I am aware of) I do not think this is a safe place for camping or any other activity. In my opinion, it would be better to place those campsites at the North Pines Area out of the River Protection Area, if possible.” (Individual, Pacific Grove, CA - #156)

Response: In the *Final Yosemite Valley Plan/SEIS*, the Preferred Alternative proposes that South Camp would be located outside the highest hazard rockfall zones (but not completely out of the base of talus line). North Pines Campground would be removed and the area was not considered for camping in the *Final Yosemite Valley Plan/SEIS* because it is located both within the 100-year floodplain and highly valued resources area.

480. Public Concern: The *Yosemite Valley Plan* should establish a campground in Curry Orchard.

“Another area in the East Yosemite Valley that could be developed for camping is the Curry Orchard. The Plan calls for the removal of parking from this area and letting the trees deteriorate over time. Other alternatives of the plan call for part or all of the orchard area to be converted to picnicking, but none propose it be developed for camping. I see little difference between using this area for picnicking or camping, especially walk-in camping. A review of the constraints for this area shows that it contains a small area of highly valued resource which could be avoided, it is outside the rockfall and flood zones but it is within an A scenic area. As explained previously, I don’t feel the scenic resources should be a constraint for campground development since other developed areas are within A scenic areas. The only constraint that would have to be remedied is the Merced River zoning. The Merced River Plan zones this area for visitor lodging (3B) instead of camping (3A). I believe camping would be less of an impact to the scenic river corridor than lodging so this should not be a constraint. At the very least this could be developed as a walk-in camping area. I ask that you consider an alternative that develops the Curry Orchard into a camping area in an effort to meet the GMP goal for number of campsites in Yosemite Valley.” (National Park Service Employee, Mariposa, CA - #6240)

Response: The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* calls for the removal of the parking facility at Curry Orchard. The Preferred Alternative also calls for the removal of the fruit trees and ecological restoration of this site to meadow and oak woodland communities (both highly valued resources).

Establishment of a campground on the site would prevent the restoration of this area to a highly valued resources area, one of the specific purposes of the *Yosemite Valley Plan*.
(Also see response to concern #21.)

208. Public Concern: The *Yosemite Valley Plan* should establish a new campground at the present concessioner stable location.

“When the horse stables are removed, this area should be redeveloped into more campsites to compensate for the more than 400 sites lost throughout the years.” (Individual, Santa Paula, CA - #20336)

Response: One of the principal goals in the *Final Yosemite Valley Plan/SEIS* is the restoration of natural processes and natural and cultural resources that create Yosemite Valley’s unique character. The primary reason for removing or relocating the stables is the restoration of the area to riparian and California black oak woodland communities. While the National Park Service is trying to maximize the number of campsites in the Valley, in response to requests by the public, this site has been determined unsuitable for camping.



661. Public Concern: The *Yosemite Valley Plan* should establish new campsites near Mirror Lake.

“There are some good options for the park that are not considered in any of the plans. The building of new campsites in the Mirror Lake area to replace destroyed campsites in the river campgrounds.” (Individual, Coulterville, CA - #3724)

Response: As a principle day-visitor destination in Yosemite Valley, the Mirror Lake area was not considered for further development in the *Yosemite Valley Plan*. Management practices have changed significantly regarding the use and access of Mirror Lake over the past 30 years based upon new insights and respect of river process and integral riparian zones. The area known as Mirror Lake is a wetland area. A temporary pool formed by a rock fall was later enlarged by the placement of a rock dam. The “lake” was artificially maintained by dredging until 1971, and vehicle access was provided due to its popularity. Natural processes rather than artificial manipulation are now allowed to prevail. Additionally, the ecological impacts of numerous automobiles to fragile areas and their impact on visitor experience and the area’s natural beauty and processes is considered inappropriate. The multi-use paved trail is still available for walking and bicycle use. Vehicle access is allowed for those with mobility impairments.

4.12.2.e ~ Relationship between Types of Campgrounds

Potential conflict between different types of camping experiences is the topic of some comments on the *Draft Yosemite Valley Plan/SEIS*. Many people addressing these relationships recommend the separation of different campground types. Focusing mostly on drive-to camping, these citizens suggest the separation of tent and recreational campgrounds. Excessive equipment noise associated with recreational vehicles and recreational vehicle size diminish the experience of tent campers near such vehicles, many individuals claim. Concentrating on another campground proximity concern, one citizen recommends separating public and private campgrounds, noting several deficiencies of private campgrounds.

737. Public Concern: The *Yosemite Valley Plan* should require the separation of different types of campsites in Yosemite Valley.

“Motor homes should be in one camp area by themselves away from the quiet tent campers. Motor home generators and TV noise and glow at night takes away from the family experience of family tent camping along the Merced River.” (Individual, No Address - #6473)

Response: In order to accommodate the greatest number of campsites in the acreage available for campgrounds, consolidation of similar types of camping is necessary (i.e., walk-in sites with adjacent parking, walk-to sites with no parking, and automobile and recreational vehicle camping). While the *Final Yosemite Valley Plan/SEIS* Preferred Alternative provides for this mix of camping experiences, the final mix of automobile and recreation vehicle campsites would be determined in the design phase for each campground.

76. Public Concern: The *Yosemite Valley Plan* should establish tent-only campgrounds in Yosemite Valley.

“Establish a tent-only campground for families . . . campers in tents shouldn’t have to be enveloped by giant motor homes and roaring generators.” (Individual, Saratoga, CA - #331)

Response: The *Final Yosemite Valley Plan/SEIS* would continue or establish campgrounds for tents only (see Vol. IA, Chapter 2, Alternatives, Visitor Services—Camping). Those campgrounds that are walk-to sites have no vehicle access provided, and those campgrounds designated as walk-in sites provide only a

remote parking area. Examples of tent-only areas are those at Backpackers Campground, Camp 4 (Sunnyside Campground), and a part of Upper Pines Campground.

22. Public Concern: The *Yosemite Valley Plan* should require that concessioner campgrounds be separated from public campgrounds in Yosemite Valley.

“Private concession campgrounds should be separated from the public sites and I believe minimum site size and privacy should be part of the negotiations. Private parks try to get as many sites in a given area as possible and often are little more than an open field with trailers back to back and belly to belly. I do not think this is compatible with enjoying the park.” (Individual, No Address - #30020)

Response: The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* does not propose to establish private campgrounds in Yosemite Valley; the National Park Service operates the campgrounds. In some campgrounds, concession operators under contract with the National Park Service may provide services such as showers and wood sales.

4.12.2.f ~ Drive-in Campsites

Respondents addressing drive-in campsites, as with those commenting on the number of campsites in general, believe the number of drive-in campsites proposed in the *Draft Yosemite Valley Plan* is inadequate. Families prefer drive-in camping, many of these individuals claim, because drive-in camping is more affordable than other accommodations proposed in the draft plan. Many advocates of drive-in campsites argue that the draft plan emphasizes walk-in sites to the detriment of drive-in campsites, further diminishing the access of families to Yosemite Valley. In addition, some people recommend specific sites for additional drive-in campgrounds, including Taft Toe, the Curry Orchard, and Housekeeping Camp.

Focusing more on the *Draft Yosemite Valley Plan/SEIS* evaluation of the number of drive-in campsites, some people feel that the National Park Service attempts to mislead the public about the scale of reduction in drive-in camping opportunities. These people believe the *Final Yosemite Valley Plan/SEIS* should include a clear comparison of changes proposed in the plan by campsite type rather than lumping all campgrounds together.

211. Public Concern: The *Yosemite Valley Plan* should establish additional drive-in campgrounds in Yosemite Valley.

“We do have one major concern that is shared by many, many folks we talked with on our recent camping trip to Yosemite. The severe reduction of family camping suggested in all plans except #5 is not family friendly. Prior to the January 1997 flood, there were over 800 campsites with the majority being drive-in family campsites. All of the draft plans, save one, cut those sites down by more than half. Since 1997 we have heard from you that the lost sites will be replaced. Now even the signs in the Visitor Center state that the River Campgrounds are ‘Permanently’ closed. To state that there will only be a reduction of ten campsites in the ‘Preferred Alternative’ is disingenuous at best. The walk-in sites can be little used by family campers. Family campers will take a double hit with the reduction in campsites as well as the conversion to more walk-in sites. A total of 295 drive-in family sites is not adequate. We believe that family camping is a major part of what our national parks should be about. To have more than a fifty percent reduction is unfair and intolerable. . . Build new drive in family campgrounds rather than so many walk-in campgrounds.” (Individual, Santa Rosa, CA - #30077)

“Put my comment in the need for more drive-in camping file. I guess prior to the flood there was somewhere around 800 spaces, and now there’s maybe a couple more than 400. And all the alternatives look like there would be an additional cutback of about 25 percent. We don’t see that much of a drastic cut in the campsites because of the increase in the other types of camping; the walk-ins, the park-to, and drive-by, tent-type camping. But when we look through all the literature, we find that the drive-in camping would be cut by an additional 25 percent, and I think that would be quite a hardship on a number of people that enjoy that type of camping. Maybe there could be some



additional drive-in. I'm not suggesting that we put back the campsites in Lower or Upper River, or the bottom portion of Lower Pines. But perhaps in the work that everyone has done, there might be some campsites found in the Taft Toe area or the Curry Village day parking if the Apple Orchard is ever dealt with, or in some of the other areas in the Valley so that there are more drive-in campsites." (Public Hearing, Costa Mesa, CA - #20306)

REPLACE HOUSEKEEPING CAMP WITH A DRIVE-IN CAMPGROUND

"With all the improvements available for setting up car camping (tent camping and cooking), I suggest eliminating all the housekeeping cabins and make it into RV and tent camping. You have been decreasing the camping areas and improving the high-end accommodations. Tent camping is the only option for many families, and they need to cook their own food. This would take care of the shantytown like housekeeping cabins that you are decreasing anyway. Eliminate them completely. At Curry Village, having to eat in the cafeteria can be very expensive for a family of four. Please allow for more RV and car camping. Not all seniors are wealthy and they can camp during the week if there were more spaces available." (Individual, Fulton, CA - #7739)

Response: The number of campsites in Yosemite Valley has been a major concern throughout this planning process, as the National Park Service is challenged to determine an "adequate" number of campsites. Within the narrow Valley, visitor accommodations cannot be provided merely on the basis of visitor demand but must be located and designed in consideration of safety constraints (floodplain and rockfall) and, particularly, of highly valued resources (see Vol. IA, Chapter 2, Alternatives, Developing a Range of Alternatives—Development Considerations; and Resource Stewardship—Highly Valued Resources of the *Final Yosemite Valley Plan/SEIS*). The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* has identified those highly valued resource areas, and locates visitor accommodations outside of these areas as much as possible. Those areas in Yosemite Valley suitable for visitor accommodations are few, and within that small space, the Preferred Alternative provides a range from rustic to deluxe. In consideration of public comments, the number of campsites in Yosemite Valley has been increased in the Preferred Alternative from 465 to 500 campsites, of these, 330 (66%) would be drive-in sites. In order to accommodate the greatest number of campsites in the acreage available for campgrounds, consolidation of similar types of camping is necessary (i.e., walk-in sites with adjacent parking, walk-to sites with no parking, and automobile and recreational vehicle camping). Historically, demand for camping of all types within the Valley has exceeded the available number of accommodations. Given the increasing population and long-term visitation trends, it is unlikely that the National Park Service would ever be able to provide enough camping in Yosemite Valley to meet the demand.

(Also see response to concern #21.)

647. Public Concern: The *Yosemite Valley Plan* should not convert drive-in campgrounds to walk-in campgrounds in Yosemite Valley.

"Under no circumstances should any drive-in camping be converted to walk-in camping. If you are determined to add more walk-in camping, then create it somewhere else instead of eliminating drive-in camping. It is my contention that walk-in camping caters almost exclusively to people from California. There are very few people who can travel long distances with a family and still be able to make use of walk-in camping. It is simply not feasible. My father and I travel all over the country from Michigan and we are simply not able to engage in walk-in camping." (Individual, San Francisco, CA - #5194)

Response: The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* proposes a reduction of drive-in campsites from 404 to 330, while increasing the total number of campsites in the Yosemite Valley by 25. Other alternatives propose fewer drive-in sites. The consolidation of camping types would provide a greater number of campsites overall, because not every campground would be designed with a road network and integral parking spaces. Currently, many sites with individual parking spaces are occupied by campers who could be accommodated in walk-in campsites.

(Also see response to concerns #98, 210, and 341.)

656. Public Concern: The *Yosemite Valley Plan* should clarify the number of drive-in campsites eliminated in Yosemite Valley.

“Why is the planning committee trying to make people believe that only 10 campsites will be lost in the new plan. The exact wording in the preferred alt #2 is, ‘total campsites from 475 to 465.’ According to the NPS reservation service there are 89 sites available in Lower Pines, 240 in Upper Pines, and 93 in North Pines, yet in alt. 2-5 the removal of North Pines that will happen is 93 sites. Alt 2 goes on to say ‘new campsites will be added,’ 40 campsites east of Curry for group and backpackers, 28 sites added at Sunnyside, 45 walk-in at Upper Pines, and 20 new walk in at Tenaya Creek. All of the new added campsites are either for backpackers or groups, or walk-ins. You are not adding 133 campsites for those that generally do not camp with their children or grandparents. How can you in good faith lead people to believe you not taking 93 sites from the average American family that comes to Yosemite to camp in either tents or RVs? Once again the family will pay the price, yet it is the middle class American that pays the majority of the taxes that help to support things like our National Parks. Walk in campsites and group campsites should not be averaged into with the tent and RV sites. The average camper has already lost 2 1/2 campsites in the Valley and now you want to take another one by closing North Pines.” (Individual, Whittier, CA - #5043)

Response: In the *Final Yosemite Valley Plan/SEIS* (Vol. IA, Chapter 2, Table A, Summary of Alternatives), the number of drive-in and other campsites proposed in each of the alternatives, including the No Action Alternative, is clearly identified.

4.12.2.g ~ Recreational Vehicle Campsites

Comments on recreational vehicle campsites are found in many public responses to the *Draft Yosemite Valley Plan/SEIS*. As with general drive-in sites, many people feel the number of recreational vehicle campsites proposed in the *Draft Yosemite Valley Plan/SEIS* is insufficient. Two suggestions from those opposing reductions in recreation vehicle campsites are to replace campsites lost to flooding and to provide parking at some walk-in sites for seasonal use by recreational vehicle campers.

The location of recreational vehicle campsites concerns some respondents more than the number of such sites do. Many people contend that recreational vehicles increase traffic congestion on Yosemite National Park roads, particularly in the east and central Valley. For this reason, the National Park Service should establish recreational vehicle campgrounds in the western Valley, these individuals recommend. Others suggest establishing recreational vehicle campgrounds outside of Yosemite Valley.

As with those requesting the separation of recreational vehicle and tent campsites, several respondents claim that recreational vehicles have detrimental visual impacts on other campers. Some of these people recommend that the National Park Service restrict the size of recreational vehicles allowed into Yosemite National Park, while others suggest methods to mitigate the perceived visual impacts of these vehicles. One person offers a slightly different vision of recreational vehicle camping than the more overt detractors. Criticizing both walk-in campsites and large recreational vehicles, this citizen recommends the National Park Service establish some campsites for small recreational vehicles.

The proposal in the *Draft Yosemite Valley Plan/SEIS* to add recreational vehicle hookups to some campsites elicits additional comments. Some people support National Park Service plans to add recreational vehicle hookups to some campsites, and recommend that hookups be added to more sites. In contrast, “RV hookups will severely deteriorate the camping experience for a significant number of adjacent campers because of the unlimited availability of electricity,” one respondent contends. “While most campers are quite considerate of others there are always some



who will party late, play loud radios, etc. RVers are no exception.” Such individuals oppose providing recreational vehicle hookups in Yosemite Valley.

A closely related aspect of recreational vehicle camping, generator noise, draws criticism from several respondents. One such critic feels that “quiet is a part of the park experience and should be a priority.” Recommendations from respondents to address generator noise include banning the use of generators, providing electrical hookups, and limiting generators to discrete areas within campgrounds.

98. Public Concern: The *Yosemite Valley Plan* should provide for adequate recreational vehicle campsites in Yosemite Valley.

REPLACE SITES LOST TO FLOODING

“Please try to put back the RV camping that was there before the flooding . . . ! Yosemite has been cutting back on RV . . . camping but not on the hotels or their clientele.” (Individual, Whittier, CA - #393)

PROVIDE PARKING AT SOME WALK-IN CAMPSITES

“I am aware that Alts 2, 3, and 4 have roughly the same number of sites but many are converted to ‘walk-in.’ Now, in early May, the walk-ins would not be used. Please make some of these ‘walk-ins’ have parking so they could be used off-season for RV’s.” (Individual, La Verne, CA - #324)

Response: In order to accommodate the greatest number of campsites in the acreage available for campgrounds, consolidation of similar types of camping is necessary (i.e., walk-in sites with adjacent parking, walk-to sites with no parking, and automobile and recreational vehicle camping). While the *Final Yosemite Valley Plan/SEIS Preferred Alternative* provides for this mix of camping experiences, the final mix of automobile and recreation vehicle campsites would be determined in the design phase for each campground.

147. Public Concern: The *Yosemite Valley Plan* should establish a recreational vehicle campground in the west end of Yosemite Valley.

“West Valley Campground: It would be a good idea to spread some of the campers into other Valley areas that are currently not so popular as the east Valley area. It is recommended that a new campground in the area of Pohono Quarry/Taft Toe be established. This would help decentralize the east Valley campers into the west end, and also reduce/decentralize camper vehicular traffic, which is extremely important. . . RV’s, motor homes and the like would be a good candidate for this new campground which would be dedicated. This would eliminate these large vehicles from the central and east end Valley roads which would be a definite plus.” (Individual, American Canyon, CA - #907)

Response: The *Merced River Plan/FEIS* has established zoning for the areas of Yosemite Valley adjacent to the river, including most of the developable area at Taft Toe. This zone would allow for development of a parking area, but only if a similar area were not constructed at Yosemite Village. In the *Final Yosemite Valley Plan/SEIS* action alternatives where Taft Toe would not be used for day-visitor parking, the zoning at Taft Toe would revert to a “Day Use” zone that would not allow for camping. An advantage of any alternative that does not provide a parking facility at Taft Toe is that no new development would intrude upon the relative solitude and mostly natural environment in the mid and west Valley. Adding overnight facilities at Taft Toe or elsewhere in the west Valley would considerably alter the west Valley experience for all visitors and eliminate a substantial benefit gained by not locating parking there.

Note: One response is provided for concerns #403 and #650, and is placed following concern #650.

403. Public Concern: The *Yosemite Valley Plan* should require the construction of recreational vehicle facilities outside of Yosemite Valley.

“RV sites with hookups and dump station should be built outside the Valley. This should be an attractive camp with convenient bus service available. It must be so desirable that most RVers would choose it over the traffic jams and congestion of the present sites.” (Individual, Fresno, CA - #2321)

Response: See response following concern #650 below.

650. Public Concern: The *Yosemite Valley Plan* should establish recreational vehicle campgrounds outside Yosemite Valley.

“In a personal view, even at the ‘low’ traffic levels, I noticed larger RV units having trouble with the Park’s twisting roads and parking pull-offs. Perhaps some RV camping spots can be relocated out of the Valley in the future (I say this while thinking I will travel by RV someday) while remaining “connected” via bus service.” (Individual, Annandale, VA - #4487)

Response: Developing additional recreational vehicle sites outside Yosemite Valley is outside the scope of this planning effort. For a description of the recreational vehicle camping proposed in the *Final Yosemite Valley Plan/SEIS*, see response to concern #19.

This response also applies to concern #403.

209. Public Concern: The *Yosemite Valley Plan* should restrict the size of recreational vehicles permitted in Yosemite Valley.

“Place a limit on motor home size. There has to be a reasonable footage. Some of those motor homes are huge and over-sized, with TV’s, microwaves etc. Let them camp somewhere else, outside the park.” (Individual, Saratoga, CA - #331)

Response: Vehicle size restrictions are based on safety and road characteristics and these restrictions would be placed on all vehicles, not any selected grouping. This is an operational issue and is not within the scope of the *Yosemite Valley Plan*.

651. Public Concern: The *Yosemite Valley Plan* should mitigate the visual impacts of recreational vehicles in Yosemite Valley.

“RV sites should be well screened and RV comings and goings limited to short time windows to minimize their detrimental visual impact?” (Individual, San Juan Capistrano, CA - #7305)

Response: This concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan*. However, it is the intention of the *Yosemite Valley Plan* to consolidate types of camping and to better separate campsites by using natural barriers and design features.

210. Public Concern: The *Yosemite Valley Plan* should establish campgrounds for small recreational vehicles in Yosemite Valley.

“Alternatives 2, 3, and 4 do not provide enough campsites (or the right kind of campsites) for the great numbers of us who wish to visit the Park ‘our way,’ i.e., by camping in small camper vans and small RV’s which do not contribute much to traffic congestion, pollution, noise, etc. Alternatives 2, 3, and 4 seem to overemphasize walk-in and walk-to camp sites and tend to squeeze out those of us who aren’t up to that single, ‘younger person,’ approach to camping out ‘down on the ground.’ That seems unwelcoming and perhaps even discriminatory toward those of us



for whom that ‘younger’ model of camping doesn’t work well. We are just as eager and should be just as entitled to make age-appropriate uses of the Park’s camping facilities as those younger people. In a great many other parks and places around the country which we have recently visited, our camping van style has been provided for and welcomed. They have let us occupy a so-called ‘tent site’ -- but it just needs to be one that allows us to park on a level place, on or adjacent to the site, which usually has a picnic table. Please try to be creative in providing enough low-tech camp sites of this sort for the many ‘small RV’ folks like us, who really do not even want to be forced to move over next to the RV ‘behemoths.’” (Individual, Alexandria, VA - #1276)

Response: Under the Preferred Alternative in the *Final Yosemite Valley Plan/SEIS*, nearly two-thirds of campsites in Yosemite Valley would be drive-in sites. (Also see response to concern #98.)

24. Public Concern: The *Yosemite Valley Plan* should restrict the use of generators in Yosemite Valley campgrounds.

“Specifically related to camping, I don’t believe generators should be allowed at all in Yosemite campgrounds. This could be accomplished by giving full electric hookups to those who need it (if absolutely necessary). Another option would be to limit generators to one or two loops and not the entire campground . . . The current rules indicate ‘reasonable use of generators during the day.’ The unfortunate reality is that everyone’s idea of reasonableness is different. Quiet is part of the park experience and should be a priority.” (Individual, Roseville, CA - #30015)

Response: This concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan*. The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* proposes the installation of some electrical hookups for recreational vehicles in Upper Pines and Lower Pines Campgrounds in Yosemite Valley. This would reduce noise from generators. Currently, park rules allow for limited use of generators between the hours of 7:00 A.M. and 7:00 P.M., with quiet hours from 10:00 P.M. to 6:00 A.M. Specific site design is beyond the scope of this planning effort.

649. Public Concern: The *Yosemite Valley Plan* should provide for additional recreational vehicle hookups at campgrounds in Yosemite Valley.

“There should be more RV hookups because people with RVs need a place to park and RVs are affordable lodging. More people would come if all they would bring is their RV. RVs should also be treated like cars and only be used to go in and out of the Valley and the Park.” (Individual, San Jose, CA - #3695)

Response: In order to accommodate the greatest number of campsites in the acreage available for campgrounds, consolidation of similar types of camping is necessary (i.e., walk-in sites with adjacent parking, walk-to sites with no parking, and automobile and recreational vehicle camping). While the *Final Yosemite Valley Plan/SEIS* Preferred Alternative provides for this mix of camping experiences, the final mix of automobile and recreation vehicle campsites would be determined in the design phase for each campground. The Preferred Alternative does provide for additional hookups for RVs. (Also see response to concern #19.)

19. Public Concern: The *Yosemite Valley Plan* should not provide for recreational vehicle hookups in Yosemite Valley.

“The proposal to install some RV hookups in camps should be deleted. . . RV hook-ups will severely deteriorate the camping experience for a significant number of adjacent campers because of the unlimited availability of electricity. While most campers are quite considerate of others there are always some who will party late, play loud radios, etc. RVers are no exception.” (Individual, Pioneer, CA - #94)

Response: The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* proposes the installation of some electrical hookups for recreational vehicles in Upper Pines and Lower Pines Campgrounds in Yosemite Valley. By providing electrical hookups, there would be a reduction in the use of gasoline

generators, thereby reducing noise and improving the visitor experience for both RV users and adjacent campers. Additionally, through campground design, there would be more opportunities in Yosemite Valley for tent campers to camp separately from RV campers.

4.12.2.h ~ Walk-in Campgrounds

Many respondents support the establishment of walk-in campgrounds, expressing opinions frequently opposed to those supporting drive-in campsites. Some of these supporters of walk-in camping claim that walk-in campsites have less environmental impact than other types of campsites. Establishment of additional walk-in campsites is recommended by many such individuals. Several campers recommend specific sites for the location of new walk-in sites, including areas near the Merced River, the Upper River Campground area, and Taft Toe. In addition to these locations, one person suggests the National Park Service retain Backpackers Campground as a walk-in facility at its current site. Expressing a disparate concern about walk-in campsites, one person insinuates that the current users of Camp 4 (Sunnyside Campground) engage in undesirable behavior and recommends that Camp 4 be eliminated as a walk-in campground.

306. Public Concern: The *Yosemite Valley Plan* should only allow low-impact camping in Yosemite Valley.

“Eliminate all overnight camping in the Valley except for personal tent, backpacking and other low-impact camping that can be carried in or on shuttles.” (Individual, Spring Valley, CA - #20412)

“We’re puzzled by your wanting additional ‘facilities’ in the campgrounds. RV’s are self-contained to the point where hookups for a few days are not really necessary. And we have not found the walk to Curry Village from Lower Pines for a shower to be an imposition. I wonder if the modern visitor really demands the upscale camping experience you seem to be assuming. Does this mean more expensive campsite fees? Are you thinking of turning the campgrounds and their daily maintenance over to the concessionaire? Surely the Park Service in their understaffed condition doesn’t have the personnel to maintain these facilities! I’d rather see the Park personnel leading nature walks than scrubbing shower stalls. Walk-to and walk-in campsites sound like a good idea.” (Individual, Camp Sherman, OR - #1801)

Response: The 1980 *General Management Plan* prescribes the continuation of a wide range of camping opportunities in Yosemite National Park. The *Final Yosemite Valley Plan/SEIS* also proposes to provide a range of opportunities for staying overnight in Yosemite Valley, including accommodation of a variety of camping experiences. Outside of wilderness areas, where informal campsites are widely dispersed, any camping allowed in the park would require developed facilities, such as marked sites and restrooms, in order to manage the impacts resulting from high use. Thus, the utility infrastructure for water and sewer and the requirements for campground maintenance would remain even with only walk-to camping sites in the Valley. Under the Preferred Alternative, walk-to campsites would be added in the Valley, providing opportunities for campers who do not drive to the Valley, and the percentage of walk-in sites would be increased to allow more efficient campground design (see response to concern #147 regarding west Valley camping, and concern #237 regarding impacts to natural resources). (Also see responses to concerns #19, #206, #402, and #1110.)

151. Public Concern: The *Yosemite Valley Plan* should establish additional walk-in or walk-to campgrounds in Yosemite Valley.

“We applaud the NPS’s creation of new campsites at South Camp, Tenaya Creek, Camp 4, and Upper Pines, and would favor an even greater increase in the number of walk-in and walk-to sites if locations could be found outside the Merced corridor and outside HVR areas.” (Conservation Organization, San Francisco, CA - #4594)



NEAR THE MERCED RIVER

“I would like to see some more of the near-river, walk-in sites.” (Public Hearing, Los Angeles, CA - #20332)

UPPER RIVERS CAMPGROUND AREA

“One way to reverse this trend is to add walk-in campsites with nearby parking. As they lack roadways, they consume less land than traditional campgrounds. The YVP suggests some locations. I would add the central part of Upper River. The parking lot already exists; utilities are in place; simply redistributing the tables, banning wood fires, and removing your stockpiled debris would go a long way towards making the place habitable. Laid out that minimally, it would not be subject to much flood damage.” (Individual, Oakland, CA - #3835)

BACKPACKERS CAMP

“I also urge you to retain the Backpackers Camp exactly where it is, as it contains some of the finest campsites in the Valley. Though part of this camp lies within the Tenaya Creek floodplain, the ‘97 damage has already been repaired.” (Individual, Oakland, CA - #3835)

TAFT TOE

“I propose an additional ‘Walk-in/Walk-to’ campground at ‘Taft Toe.’” (Individual, Berkeley, CA - #529)

Response: The 1980 *General Management Plan* prescribes the continuation of a wide range of camping opportunities in Yosemite National Park. The *Final Yosemite Valley Plan/SIES* also proposes to provide a range of opportunities for staying overnight in Yosemite Valley, including accommodation of a variety of camping experiences. Under the Preferred Alternative, walk-to campsites would be added in the Valley, providing opportunities for campers who do not drive to the Valley, and the percentage of walk-in sites would be increased to allow more efficient campground design.

(Also see response to concern #147 regarding west Valley camping.)

706. Public Concern: The *Yosemite Valley Plan* should eliminate Camp 4 (Sunnyside Campground) as a walk-in campground.

“Eliminate Camp 4 as a walk-in campground. It has always been a problem. . . [with] hanger-ons who don’t follow the rules and make Yosemite their home. A rule for one camper should pertain to all. You don’t need this element in the Park. The other (new) walk-in camp sites should be governed by the same rules. Yosemite has had their share of tragedies. Rules can be enforced so that the average camper can go home with a wonderful and safe experience.” (Individual, Lodi, CA - #2318)

Response: Camp 4 (Sunnyside Campground) is eligible for listing on the National Register of Historic Places. Retention of the camp also facilitates the goal of providing diverse camping opportunities for Valley visitors. Each of the action alternatives in the *Final Yosemite Valley Plan/SEIS* proposes retaining Camp 4 as a walk-in campground.

4.12.2.i ~ Group Campgrounds

Respondents’ comments on group campgrounds generally support the retention of group facilities in Yosemite Valley. “Groups that take over campgrounds . . . do not live well with other guests,” one person claims. “A group campground for large groups has less impact and just makes practical sense.” Another advocate for a group campground in the Valley, specifically recommends that the National Park Service establish a group site in a “desirable” area, such as near the Merced River, along Tenaya Creek, or at the current group campground site at Yellow Pines. Though not explicitly opposing group campgrounds in the Yosemite Valley, other people suggest the National Park Service establish some group campgrounds outside Yosemite Valley.

78. Public Concern: The *Yosemite Valley Plan* should establish a group campground in Yosemite Valley.

“A group camping area should be restored. Groups that take over campgrounds . . . do not live well with other guests. A group campground for large groups has less impact and just makes practical sense.” (Individual, Saratoga, CA - #331)

LOCATE GROUP SITE IN A DESIRABLE AREA

“My main concern with the preferred alternative is the location of the group campground in Yosemite Valley. I feel that people traveling as a group to camp are using one of the least impact methods available. All vehicles of the group are occupied by several people, more are coming just for the day, and the area needed for the group is far less than if they were camping in smaller groups as in the other campsites. Therefore, since group campers provide less impact than individual campers, the group site should be in one of the best locations. Factors making campsites ideal, in my opinion, are water access and tree coverage. Your location near the apron provides neither. I strongly urge you to relocate the group camp closer to the Merced River or Tenaya Creek in a wooded location.” (Individual, Wilton, CA - #5488)

Response: The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* (see Vol. IA, Chapter 2, Alternatives, Visitor Services—Camping) provides for the establishment of a group camp in a mostly wooded tract east of Curry Village, at the new South Camp location. In keeping with the goal to provide a greater separation of types of camping, the group camp would be separated from most other camping facilities.

212. Public Concern: The *Yosemite Valley Plan* should retain Yellow Pine campground as a group site.

“Make the Yellow Pine area a group/volunteer camping area instead of restoring it.” (Individual, Pacific Grove, CA - #156)

Response: Development of a public campground in this area would require new utilities and would introduce substantially greater overnight use of an area experiencing only minimal use now. To better meet the goals of the *Final Yosemite Valley Plan/SEIS*, the Preferred Alternative proposes restoration of the area to natural riparian and conifer communities.

618. Public Concern: The *Yosemite Valley Plan* should establish group campsites outside Yosemite Valley.

“Group sites should be available in Tuolumne or outside the valley.” (Individual, Costa Mesa, CA - #7327)

Response: This concern is acknowledged; however it is outside the scope of the *Yosemite Valley Plan*. In the *Final Yosemite Valley Plan/SEIS* Preferred Alternative, group camping is proposed to be placed at South Camp. Also, a volunteer group campground would be relocated to a site previously used for this purpose at Foresta. Group camps are presently available outside Yosemite Valley at the Wawona, Bridalveil, Hetch Hetchy, Hodgdon Meadows, and Tuolumne Meadows Campgrounds.

4.12.3 ~ Lodging Accommodations

Lodging accommodations are central to many people’s comments regarding proposals for visitor services in the *Draft Yosemite Valley Plan/SEIS*. Concerns distilled from lodging comments are analyzed in three sections: general management direction, rustic accommodations, and hard-sided accommodations.



4.12.3.a ~ General Management Direction

The array of comments analyzed in this section address concerns pertinent to both rustic and hard-sided lodging facilities. Topics considered in these comments include the number of lodging units in Yosemite Valley, lodging for educational groups, lodging reservations, location of lodging facilities, zoning requirements, and the design of lodging units.

Addressing the number of lodging units proposed in the *Draft Yosemite Valley Plan/SEIS*, many respondents oppose the reductions in the Plan, and some even suggest that the National Park Service increase the number of lodging units in Yosemite Valley. The National Park Service should restore lodging units to their pre-flood numbers, other such people recommend.

Individuals expressing these sentiments offer a variety of reasons for opposing plans to reduce the number of lodging units. Similar to those who oppose proposals to reduce camping units, some respondents believe a reduction in lodging accommodations will limit access for low-income visitors. Others opposed to reducing lodging units contend National Park Service plans will negatively impact visitor experience. Overnight stays are necessary to truly enjoy the Valley, some of these people claim, while others feel long commutes from accommodations outside the park place undue hardship on visitors who wish to spend their days in the Valley. Some of the respondents addressing commuting difficulties from outside the park also believe that a reduction in Valley lodging will lead to development of facilities in communities outside the park. This development will negatively impact these communities, they assert. Other individuals opposing reduction in lodging facilities feel that the National Park Service is overemphasizing camping, while still others contend that the Valley can accommodate more lodging given proposed reductions in private automobile use.

In contrast to critics of the National Park Service plans to reduce lodging accommodations, some people feel that limits should be placed on the amount of lodging development in the Valley. Sufficient accommodations exist or can be developed outside Yosemite National Park, these people assert, and they oppose the construction of any new lodging facilities in the Valley. One person proposes an even more drastic management suggestion; the National Park Service should only provide lodging accommodations to disabled visitors.

Concentrating on the lodging needs of a specific population, many respondents address the provision of lodging for educational groups. The National Park Service should ensure sufficient lodging in Yosemite Valley for educational groups, especially Yosemite Institute classes, most of these people believe. Experiential education programs are vital to society because they are invaluable for teaching about ecosystem processes, some people claim. These people contend that moving lodging facilities for students outside the Valley will diminish their educational experience, particularly the nighttime experience. Daily commutes will not only cut into instruction time but also add to traffic congestion and pollution in the park, such people insist. For these reasons, the National Park Service should retain existing units at Curry Village for students, some individuals argue, while others recommend establishing separate student dormitories in this area.

Focusing more on administration of lodging accommodations than on facilities, many people feel the National Park Service should improve Yosemite National Park's lodging reservation system. Complaints about the difficulty of acquiring lodging reservations are common from these respondents. Many such individuals contend that the number of reservations allotted to commercial tour operators is excessive, and they suggest limiting reservations by such businesses.

Concerns regarding restrictions on location and design of lodging units, which are the focus of several comments on lodging accommodations, conclude this section. A few respondents, citing safety concerns, suggest removing lodging facilities from rockfall zones. The *Draft Yosemite Valley Plan/SEIS* does not provide sufficient zoning guidance, other people contend, and they call for inclusion of basic zoning regulations in the plan. Still other individuals highlight more specific design concerns in their comments. Expressing a common sentiment, one person asserts that lodging units “should not be visible from the Valley rim overlooks.” People with such opinions recommend that the height of lodging facilities be limited. Addressing another design concern, some respondents suggests that the National Park Service increase spacing between tent cabins. Retrofitting lodging units to accommodate disabled persons is yet another design recommendation offered by a few individuals.

129. Public Concern: The *Yosemite Valley Plan* should emphasize lodging accommodations in Yosemite Valley.

“I see a trend toward eliminating visitation, not only at Yosemite, but at other National Parks, as well. The goal of this disturbing trend seems to be to eliminating almost all visitation except by those who are willing/able to backpack and camp by removing rental cabins from the Lodge, Camp Curry, Housekeeping, etc. Some of us cannot camp, and can only enjoy the Yosemite experience if we can stay in a cabin or motel room. Face it, Yosemite is not a day trip because of the distance one must travel to access the valley floor from outside the Park. Housing must be provided for an overnight stay if one is to truly enjoy what the valley has to offer.” (Individual, Canyon Country, CA - #927)

“Reducing the number of overnight accommodations of any kind. The wrong thing to do. Why? It already often takes one year+ lead time for reservations in and around the park. Fewer places to stay means fewer visitors and even longer lead times.” (Individual, No Address - #7980)

“Reducing guest accommodations in Yosemite Valley has the predictable effect of increasing guest accommodations in the outlying communities. This forces the Park guest to spend more of their time commuting in and out of the Park. These commutes are very stressful for the guest and fill our roads with extra traffic that causes pollution and more dangerous situations on your roads. The emphasis on motels on the outside of the park brings the predictable sin city effect around the periphery of the park. The recent murders in Yosemite should be a warning as to the consequences of this emphasis.” (Individual, Coulterville, CA - #3724)

“I object to any proposal to substantially reduce lodging for overnight guests at Yosemite. It is much easier to stay inside the Park and not commute 3 hrs daily, especially after a 3000-mile flight and a 6-hour drive up from Los Angeles.” (Individual, Marlboro, MA - #5523)

INCREASE LODGING ACCOMODATIONS

“More people should be able to find accommodations in the Valley, and without their cars, the impact of additional overnight visitors would be acceptable. Many more accommodations should be constructed. There are good sites for these which have minimal impacts. The Taft Toe area would accommodate a hotel for instance. An extreme example of the result this would create is Zermatt, Switzerland. There, a huge number of visitors, with out their vehicles, is tolerable. A lesser number of hotel accommodations than Zermatt although more than is presently in Yosemite, should produce a good visitor experience without undue pressure on the environment.” (Individual, Chico, CA - #537)

RESTORE LODGING ACCOMODATIONS TO PRE-FLOOD NUMBERS

“Lodging should be restored to preflood numbers allowing for more lower income families to enjoy the park. The draft plans do not allow adequate accommodations for lower income families.” (Non-NPS Yosemite National Park Employee, Yosemite National Park, CA - #6242)



“Just a few of the many issues that have raised concern about the Valley Plan: Restore lodging to pre-flood levels.” (Individual, Rancho Palos Verde, CA - #7919)

Response: With increasingly available rapid transportation and the development of recreation, lodging, and camping facilities in gateway communities, visitors are no longer dependent on overnight accommodations (camping and lodging) within Yosemite Valley during a visit to Yosemite National Park. Nonetheless, the National Park Service recognizes that there is great value in being able to experience the Valley in the evening, night, and early morning, and overnight accommodations facilitate this special experience for park visitors. Determining the appropriate amount and types of overnight accommodations to provide a quality visitor experience remains a challenging issue.

Target numbers of campsites and lodging units were established through a public process in the 1980 *General Management Plan*. The number of lodging units were further refined in the 1992 *Concession Services Plan*. The *Final Yosemite Valley Plan/SEIS* proposes to vary the number of campsites and lodging units in an effort to improve the quality of visitor experiences while protecting and preserving resources for future generations. Decisions on the number and type of visitor accommodations must be based on resource and site condition. These conditions include floodplains and geological hazard areas (see Vol. IA, Chapter 2, Alternatives, Developing a Range of Alternatives—Development Considerations), as well as the quality of the overnight experience and how closely it relates to the park and the immediate environment.

Based on the diversity of public comments received on the *Draft Yosemite Valley Plan/SEIS*, the Preferred Alternative in the final plan would provide for overnight experiences that allow more direct access to and connection with park resources, thereby enhancing each visitor’s overall park experience. While the Preferred Alternative in the *Draft Yosemite Valley Plan/SEIS* proposed a total of 1,446 campsites and lodging units, the Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* proposes 1,461 campsites and units, with an emphasis on lodging accommodations that are economical and provide a unique resource-related experience.

622. Public Concern: The *Yosemite Valley Plan* should increase the number of lodging units in Curry Village.

“I oppose the reduction in the sites of Camp Curry. I am in favor of adding 2 more sites of 150 to 250 each. At a \$25.00 per night price with a maximum of 6 nights stay.” (Individual, Sacramento, CA - #5327)

Response: Under the revised Preferred Alternative in the *Final Yosemite Valley Plan/SEIS*, the National Park Service would rehabilitate existing facilities and add some new facilities to Curry Village. The National Park Service would strive to retain the historic character of the Camp Curry Historic District (which is listed in the National Register of Historic Places and is the most intact historic tent camp in the National Park Service), and continue this unique historical lodging experience. The National Park Service would accomplish this by retaining 174 tent cabins (a major character-defining feature of the district); retaining and rehabilitating the 80 existing cabins without bath; rehabilitating the existing historic wood bungalows; rehabilitating the historic residential units and adaptively reusing them as lodging units; and rehabilitating the historic commercial facilities. New cabin units with bath would be constructed in the historic district to provide additional lodging opportunities.

(Also see response to concern # 21.)

213. Public Concern: The *Yosemite Valley Plan* should not establish new lodging accommodations in Yosemite Valley.

“I am against the building of motels on the premises because there has been an increase of motels outside of the park and feel there is no need to build more inside.” (Individual, No Address - #30185)

“Because lodging for visitors outside the park has expanded dramatically in recent years, there is no need to build costly accommodations within the Valley. Since the flood, the Park Service has removed 40% of Valley camping sites, and is not proposing to restore them. Instead it proposes to remove the low cost, low impact tent cabins at Curry and build costly motel rooms at the Lodge. The imprint of Yosemite Lodge should be reduced over time, not expanded.” (Individual, Santa Clara, CA - #2299)

Response: Significant public comments were made supporting economically priced accommodations in the Valley and at the same time expressed concerns about developing additional luxury motel units. In response, the Preferred Alternative has been modified from the draft so that new lodging units at Yosemite Lodge would be smaller-scale economy units.
(Also see response to concerns # 21, # 83, and #1065.)

696. Public Concern: The *Yosemite Valley Plan* should limit the availability of standard lodging accommodations in Yosemite Valley to physically challenged visitors.

“Standard motel rooms should not exist in the Valley except for those physically unable to use more rustic facilities, as that is an extraneous attraction.” (Individual, No Address - #7311)

Response: All new facilities resulting from the implementation of the *Final Yosemite Valley Plan/SEIS* would be accessible to individuals with disabilities. The *Yosemite Valley Plan* would provide a diversity of facilities and experiences available to all visitors. In response to public comments, new overnight visitor accommodations proposed in the Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* would provide unique experiences more closely associated with the Valley’s environment.

382. Public Concern: The *Yosemite Valley Plan* should include a provision for adequate lodging accommodations in Yosemite Valley for educational groups.

“None of the proposed alternatives address the importance of providing accommodations for environmental study programs, as conducted by The Yosemite Institute. Environmental study programs provide invaluable practical scientific and environmental training for middle school children. Student facilities in natural areas, as important and influential as Yosemite Valley, will become increasingly vital to our society as open space dwindles. What better purpose can accommodations within Yosemite Valley provide than opportunities for future generations to better understand our environment and heritage? Student housing in Yosemite Valley is essential to support massive growth of student travel (predicted by leading tourism trend analysis).” (Business, Yosemite National Park, CA - #3962)

“As a teacher, I know the best way to get to a student and have them understand what’s going on in this world is to get them on an emotional level. So I am all for the Yosemite Institute. I am all for preservation of the Park, and I am concerned about what happens to the Yosemite Institute participant if they are housed outside the Park. Their time is quite limited in the Park if they are having to be bused into the Park. To see wildlife at night and see the activity level has made a profound effect on me as to my understanding of what’s going on with the processes of the ecosystem, and what happens with predator and prey. The Yosemite Institute has been [an] instrument in giving us opportunities for evening night hikes to see what is going on in the Park, and that will be taken away if we are housed outside the Park. I would really like to work with the Park and Yosemite Institute to be able to keep those kids in the park and in the Valley, so they can have a total experience, and so they can have a clear understanding as to the processes that occur in the Park.” (Public Hearing, La Canada, CA - #20354)

ALLOCATE PORTIONS OF CURRY VILLAGE FOR STUDENT ACCOMMODATIONS

“The Plan should consider allocating 150 of Curry Village’s proposed 420 rooms to campus-styled dormitories. These dormitory buildings ideally would have central hallways for security, communal male and female bath/shower rooms for lower cost, and individual dormitory-styled rooms with four single or bunk beds. Additionally, one teacher/chaperone room (accommodating two adults) for every five student dormitory rooms accommodating 20 kids) should be located on each floor. Combination classroom/lounges, as are provided at Asilomar, would be



useful for winter classroom sessions and should be considered on each floor.” (Business, Yosemite National Park, CA - #3962)

RETAIN CURRY VILLAGE ACCOMODATIONS

“The way I understand it, Curry Village would be mostly removed and the YI will be transferred to Crane Flat. The children attending YI would be bussed into and out of the valley daily. This alone, would devastate the program from a time standpoint. The YI counselors have a schedule that allows for very little ‘down time’ if any at all. Where would the time spent on the bus, both directions, come from? The only possible answer could be ‘from the YI program.’ While I attended YI with a class of 3rd graders, we took a night nature walk in the valley that my daughter and I will never forget. It is one thing to view nature with your normal senses during daylight, but a whole different experience in the dark. The impact nature and the YI had on the children and adults that evening was incredible. This would be lost if the YI program is moved to another location.” (Civic Organization, Citrus Heights, CA - #1358)

“The tent cabins in Curry Village have served as ‘base’ for the students while learning about Yosemite’s origin, history, environment, and, ironically, preservation. To wake up on the Valley floor was one of the highlights of my daughter’s week-long visit. Eliminating such a large number of these cabins will lead to the demise of the program as it exists today. This loss would be tragic. Alternative housing outside the Park, or even on the perimeter of the park, is neither financially feasible for these students nor environmentally practical. Hundreds of students each day will still need access to the Valley floor, requiring buses or other vehicles to transport them to and fro. This reality adds to traffic congestion and pollution.” (Individual, Carmichael, CA - #9101)

“Do not remove the cabins without the baths and replace them with cabins with baths, which will greatly increase cost for YI and keep kids from being able to attend.” (Individual, Rancho Cucamonga, CA - #1217)

Response: In response to public comment, the numbers and types of lodging available in Yosemite Valley in the Preferred Alternative have been changed between the *Draft* and *Final Yosemite Valley Plan/SEIS* to provide a greater number of economical overnight accommodations. This would help to meet the needs of environmental education groups. (Also see response to concern #83).

731. Public Concern: The *Yosemite Valley Plan* should improve the lodging reservation system for Yosemite Valley.

“My wife and I went to Yosemite last week and tried to get a reservation for an overnight. There was nothing available in the valley or Tuolumne Meadows. As we stood at the registration desk hoping for a cancellation, we counted six busses full of Japanese, Germans and many others who had reservations. My wife was told one year ago to call reservations one year & one day ahead. When she called—they were already full—nothing available. We live in Merced and we pay all the taxes due whether local, state, or Federal. Why can these people from ten thousand miles get reservations and my family can’t?” (Individual, Merced, CA - #5522)

ESTABLISH A FIRST COME FIRST-SERVED SYSTEM WITH A 30-DAY LIMIT

“Establish a new Reservations Policy for lodging at any time or for any other activity at Yosemite National Park as a First-Come-First-Served system, with not more than 30-days advance reservation, to include recreational vehicle (RV) reservations.” (Conservation Organization, Camarillo, CA - #2627)

LIMIT RESERVATIONS BY COMMERCIAL TOUR OPERATORS AND TRAVEL AGENTS

“We currently have a very difficult time making reservations for the days we want to go to the park. We usually go in late September and have to speed dial 366 days in advance sometimes for an hour or two and we don’t always get accommodations. With more people possibly wanting to stay in the valley it may become nearly impossible to get reservations even with planning a year ahead of time. We suggest that the blocks of rooms sold to tour operators be limited to allow family groups a chance to get in. We also recommend that a waiting list be instituted for those

that call in 366 days in advance because these people have really tried to work with the system.” (Individual, Countryside, IL - #3680)

Response: This concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan*. It is acknowledged that the demand for lodging accommodations inside Yosemite National Park far exceeds the available supply, which results in frustrations for many people wishing to stay in the park. Tours account for less than 20% of the total rooms rented. The National Park Service would continue to work with the concessioners to establish a fair and equitable system to allocate this popular and unique experience.

441. Public Concern: The *Yosemite Valley Plan* should require the removal of lodging from geological hazard areas in Yosemite Valley.

“I agree the Merced River needs to be restored and the lodging located away from Geologic Hazards because it saves lives and reduces injuries. The geologic hazards are unpredictable like an earthquake that can happen at any time.” (Individual, San Jose, CA - #3695)

Response: Geologic hazards guidelines are considered within this plan. The guidelines allow for retention of lodging within rockfall areas but prohibit the construction of new facilities within those areas, unless no practicable alternative exists and all safety and hazard probability factors have been considered.

342. Public Concern: The *Yosemite Valley Plan* should include basic zoning regulations for visitor facilities.

“The thousands of pages of the plan fail to give such basic zoning factors such as height, density, floor-area-ratation and footprint for the various use areas. In one place, the document dismisses such factors as site and height of proposed buildings as being ‘design details’ to be considered later. The documents are also extremely vague about allowable uses, giving only the most general labels to some areas which cry out for further delineation, as noted in my previous letter. Such things are rock-bottom basic factors in zoning. Failing to disclose them makes a sham out of the pretense of having public hearing to discuss the plans. Valid public hearings cannot occur when the most basic and normal information is absent. Lest anyone think that lack of space was the cause of this egregious level of non-information, I brought a modest sized manila envelope containing the entire zoning regulations of the city of Ashland, Oregon. They are less than 40 pages long. I compared this with the huge mass of the proposed plan. Clearly an extra 40 pages would not have increased its bulk by much.” (Individual, Menlo Park, CA - #3564)

Response: The *Final Yosemite Valley Plan/SEIS* is a conceptual plan. Development and other specific areas, also called “bubbles,” were identified in the document at a gross level in order to analyze environmental impacts associated with the proposed projects. The next step for these “bubbles” is to prepare comprehensive site design plans. These design plans would contain traffic circulation linkages, building locations and footprints, and design specifications and capacities of facilities including height and design parameters. The National Park Service has made a commitment to share these plans with the public in order to develop the best design solutions possible (see Vol. II, Appendix M, Compliance insert, for more information). The *Final Yosemite Valley Plan/SEIS* also commits to developing land-use zoning to complement the land-use zoning developed for the *Merced River Plan/FEIS*. (Also see Vol. IA, Chapter 2, Alternatives, Actions Common to All Action Alternatives, and Vol. II, Appendix B, Merced Wild and Scenic River.)



163. Public Concern: The *Yosemite Valley Plan* should require specific features in the design of lodging units.

HEIGHT OF LODGING UNITS

“The YVP calls for three-story lodgings at Yosemite Lodge (page 2-41) and three-story dormitories at Curry Village (page 2-52). These new structures should not be so tall that they would clear the trees and be visible from Valley rim overlooks such as Yosemite Point and Glacier Point.” (Individual, Oberlin, OH - #580)

SPACING OF TENT CABINS

“The spacing of tent cabins is a disgrace by any standard. By and large, the spacing between tent cabins is just enough to allow the carpenters minimum workspace to erect the units each spring, and is usually about 24 inches which is ridiculous. This closeness results in embarrassing and senseless situations which are a constant insult to lodgers. . . Tent cabins should be spaced out more to allow for more privacy between units.” (Individual, American Canyon, CA - #907)

Response: The *Final Yosemite Valley Plan/SEIS* both proposes actions and is a conceptual plan. Many actions would require specific site designs. These design plans would contain circulation linkages; building locations and footprint; design specifications; and capacity of facilities including height, spacing (tent cabins), and design parameters. New developments would maintain a park-like character and be sensitive to the fact that Yosemite Valley is a cultural landscape eligible for listing on the National Register of Historic Places. Although the National Park Service is not required to put site design plans out for public involvement, the National Park Service has made a commitment to share these plans with the public to develop the best design solutions possible.

442. Public Concern: The National Park Service should retrofit existing hotels to accommodate the needs of people with disabilities.

“Retrofit existing hotel facilities with the necessary aids for handicapped persons—not simply wider doors, but grab bars by toilets, in showers, for example. Don’t simply build these into new construction which we do not want anyway.” (Individual, Palo Alto, CA - #3522)

Response: As addressed in Vol. IA, Chapter 2, Alternatives 2 – 5, Access for Visitors with Disabilities, the National Park Service would develop an accessibility plan to provide the best feasible access for visitors with disabilities.

4.12.3.b ~ Rustic Lodging Accommodations

Rustic lodging accommodations are of significant interest to many who commented on the *Draft Yosemite Valley Plan/SEIS*. Some individuals make general comments on the amount and location of rustic lodging, while others address management of specific sites.

Most of those people addressing rustic lodging units feel that the National Park Service proposes excessive reductions in the number of such accommodations. Respondents cite a variety of reasons for opposing these proposed reductions. Capturing a sentiment shared by many individuals, one person states, “The people that stay there are like the people who sit in the last row of the opera, they appreciate it more but are limited financially to getting better accommodations.” Rustic units are more affordable than other lodging options and more convenient than camping, especially for families and the elderly, they assert. Other respondents believe rustic facilities provide a more natural and appropriate experience than hard-sided units, while some people claim that rustic units have less impact on park resources than other facilities. In addition to those who advocate for the retention of rustic units, one detractor of the draft

plan's reduction in rustic accommodations recommends replacing the Ahwahnee Lodge with tent cabins. Focusing more on mitigating the impacts of the proposed reductions, another critic of the draft plan believes the National Park Service should encourage the development of rustic facilities outside Yosemite National Park.

The *Draft Yosemite Valley Plan/SEIS* proposals for Housekeeping Camp elicit comments from many people. Expressing similar sentiments as those discussed above, many people specifically oppose reductions in the number of units at Housekeeping Camp. "Housekeeping allows for families to camp without having to purchase all of the camping necessities. Furthermore, it allows for a comfortable environment for aging adults who have difficulties and for young children and their parents," one Housekeeping camp proponent claims. Another individual muses, "We wonder about adding expensive units at the lodge while drastically reducing lower-priced accommodations at Housekeeping Camp. Frankly, you experience the park more naturally in those simpler accommodations." A few advocates of Housekeeping Camp believe the National Park Service should retain the number of units proposed under Alternative Five because extra rustic facilities in the Merced River floodplain are more important than impacts to a highly valued resource. Some of these people also feel that Housekeeping Camp units would not be economically viable for the concessioner at the numbers proposed in Alternative Two.

In contrast to those supporting the retention of Housekeeping accommodations located in the floodplain, a few respondents suggest the National Park Service relocate these units. Other individuals opposing reduction in units at Housekeeping Camp focus on management of specific Housekeeping facilities. They call for the removal or reduction of fire pits at Housekeeping Camp to help remedy the smoke problem in the Valley.

Not all of those who comment on Housekeeping Camp champion the idea of maintaining this area as it currently exists. "Regardless of its value as a place for communal and family camping in Yosemite Valley, Housekeeping Camp should not be retained. It should be removed entirely, because it is an eyesore and an affront to the river," one person reasons. Whether they call for complete elimination of Housekeeping Camp or only a reduction in numbers, several people exhort the National Park Service to implement lodging plans that protect the Merced River.

Curry Village facilities, like Housekeeping Camp, are the emphasis of many comments on rustic accommodations. Many people oppose *Yosemite Valley Plan* proposals for a reduced number of rustic lodging accommodations at Curry Village. Reasons cited by such individuals are similar to those expressed for Housekeeping Camp, especially the contention that such rustic units provide affordable options for low-income visitors. Suggesting a mitigation measure for the removal of some Curry Village units in rock-fall zones, a few respondents believe the National Park Service should consider relocating rather than eliminating such units.

The design of Curry Village's rustic facilities is the topic of a few comments. Some respondents believe the density of Curry Village tent cabins is detrimental to visitor experience. The National Park Service should, they contend, require a reduction in the density of Curry Village tent cabins. Other respondents commenting on design considerations argue that housing both student groups and vacationing families in Curry Village tent cabins detracts from the latter visitors' experience. Given the excessive noise generated by these student groups, they recommend the construction of dormitory facilities separate from the tent cabins.



71. Public Concern: The *Yosemite Valley Plan* should retain rustic lodging units in Yosemite Valley.

“For God’s sake do not do away with the tents. The people that stay there are like the people who sit in the last row of the opera, they appreciate it more but are limited financially to getting better accommodations.” (Individual, San Francisco, CA - #312)

“I am generally pleased with the plan to improve Yosemite. However, I would like to see the tent cabins remain. Visiting a National Park is not just about seeing what it looks like. People also need the opportunity to experience what it is like to live there, if only for a short time . . . Generic motel rooms do not give a sense of place.” (Individual, No Address - #322)

“Curry Village/Housekeeping Tents Removal: Many people enjoy this type of accommodation. Families who do not have camping equipment and cannot afford Curry or Lodge cabins or rooms can enjoy these facilities at a reasonable price.” (Individual, Roseville, CA - #341)

REPLACE AHWAHNEE LODGE WITH TENT CABINS

“Tear down the Ahwahnee, and convert the property and grounds to tent cabins. Assuming a generous 80% occupancy, the Ahwahnee’s 123 rooms will accommodate, maybe, 73,000 people a year. Add in the proposed 120 new motel rooms which will accommodate another 72,000 or so people a year and that totals about 145,000 visitor nights. Now, let’s trade all of those visitor nights for, say, 150 tent cabins on the same property and assuming a likely occupancy by a family of 4 we have eliminated the very unnatural presence of the Ahwahnee and a two story motel, preserved the river flood plain [sic] once occupied by the tent cabins and provided access to the same number of people but in more environmentally esthetic, John Muir type of accommodations.” (Individual, Roseville, CA - #7336)

Response: In response to public comments about retaining rustic lodging that provides quality park experiences, are economically priced, and offer unique overnight experiences in Yosemite Valley, the number of rustic lodging units has been increased in the Preferred Alternative of the *Final Yosemite Valley Plan/SEIS*. More tent cabins have been retained as part of the Curry Village Historic District, a cultural highly valued resource. Housekeeping Camp units have been retained in the Preferred Alternative to the extent possible given the implementation of the River Protection Overlay established by the *Merced River Plan/FEIS*. Locating Housekeeping units in other areas and retaining more tent cabins was considered. But given constraints on developable land, the corresponding reductions in other opportunities that would have to take place, and the trade-off between seasonal and year-round use for each lodging type, the number of various lodging types found in the Preferred Alternative are felt to provide an appropriate overall mix of overnight experiences.

698. Public Concern: The National Park Service should encourage the development of rustic lodging units outside Yosemite National Park.

“The NPS should work strenuously to foster the construction of both tent cabins and housekeeping units immediately outside of the park, at comparable rental rates, to replace all if not more [?] of the units it proposes to eliminate within the park. This will ensure that these two types of accommodations will still be available to visitors, especially those of more modest economic means or levels of physical health.” (Individual, Carmichael, CA - #5558)

Response: The development of rustic lodging on private lands outside of Yosemite National Park is outside the scope of this planning effort. Since the 1980 *General Management Plan* was adopted, it has been the policy of Yosemite National Park to reduce lodging from pre-*General Management Plan* levels within the park. The *General Management Plan* also encouraged the development of overnight accommodations in gateway communities and other lands outside the park. However, the National Park Service has no means to ensure that rustic lodging options would be provided outside the park’s boundary.

339. Public Concern: The *Yosemite Valley Plan* should retain existing Housekeeping Camp units.

“I am writing to urge that you keep Alternative #1, retaining Housekeeping, as it is and retaining all of the campsites. Housekeeping is unique, allows middle-class families to enjoy the camping experience without having to purchase expensive camping equipment or stay in the lodge. There is nothing like it anywhere else, and probably nowhere else in the country.” (Individual, Venice, CA - #2357)

“The Housekeeping units should not be removed. They provide a comfortable alternative to car camping and an affordable alternative to more the more expensive lodging available. If your plan to eliminate all but 52 units takes effect, those who cannot afford to pay the rates charged and also eat out every day will not be able to enjoy the Yosemite experience.” (Individual, San Diego, CA - #3493)

“This letter is in reference to your plans to remove 212 housekeeping units. It would be unfortunate if my family and other families were prevented from the Yosemite experience because lodging was not available. Housekeeping allows for families to camp without having to purchase all of the camping necessities. Furthermore, it allows for a comfortable environment for aging adults who have difficulties and for young children and their parents. Please consider what the action of removing these units will do to not only current families that enjoy the Park but also other individuals that may have the opportunity to enjoy Yosemite if these units are removed.” (Individual, San Ramon, CA - #4413)

“Over the last 40 years, our family has used the Housekeeping units many times and have loved it. We feel strongly that everyone should have a chance to visit Yosemite and enjoy the real experience by living outdoors in the Housekeeping Units. We wonder about adding expensive units at the lodge while drastically reducing lower-priced accommodations at the Housekeeping Units. Frankly, you experience the park more naturally in those simpler accommodations such as in those units.” (Individual, No Address - #7104)

RETAIN NUMBER OF UNITS PROPOSED IN ALTERNATIVE FIVE

“We favor the 162 unit approach of Alt 5. Why? The lack of rustic accommodations (after the Curry Village changes) over-rules the small loss of HVR land. This is still 102 units less than previous years, a reduction we can support.” (Individual, Oakhurst, CA - #3379)

“I fully support your river overlay plan with the 150’ setup in the Housekeeping area. Because the Housekeeping units are so popular and are so well suited for families and friends camping together, I suggest that alternative 5 which retains 162 units instead of only 52 be recommended. This suggestion would trade a very few acres of the ‘highly valued resource’ for 110 extra Housekeeping units which more that triples the number of units. Also, at only 52 units, I question whether or not the Housekeeping units would remain economically viable for the concessionaire. This seems to me to be an excellent trade-off. I would point out that camping and Housekeeping units require fewer employees per visitor that other lodging since we provide most of our own food and don’t require daily unit cleaning.” (Individual, Palo Alto, CA - #3143)

Response: Based on public comment regarding the importance of Housekeeping Camp as a unique experience and economical lodging option, the Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* has been modified to maintain the existing units located outside the River Protection Overlay as prescribed in the *Merced River Plan/FEIS*. Under the Preferred Alternative, 100 units would remain at Housekeeping Camp, an increase of 48 units from that proposed by the Preferred Alternative in the *Draft Yosemite Valley Plan/SEIS*.

(Also see response to concern #21 and #113.)

73. Public Concern: The *Yosemite Valley Plan* should relocate rather than remove the Housekeeping Camp units eliminated for protection of the Merced River.

“Let me start by saying that I see the need for relocating the 212 individual housekeeping units from the River Protection Overlay as specified in the ‘preferred’ Draft Yosemite Valley Plan. I say relocate rather than remove because these 212 units are essential if the balance of accommodations in Yosemite National Park is to be maintained. In the criteria that provided guidance for ‘accomplishing the broad goals of the 1980 General



Management Plan,' your draft states that the visitor should be provided with'. . . a variety of camping and lodging experiences.' . . . With an ice chest, bedding and some appropriate clothes, a family can affordably gain the experiences that the best of camping has to offer, without the baggage and without a heavy toll on the natural resources of the Park." (Individual, Visalia, CA - #457)

"I suggest that if housekeeping tent sites must be removed for restoration of the floodplain, that they be replaced be [sic] an equal number of bare campsites, or other affordable accommodations." (Individual, Forest Hill, CA - #4962)

Response: The National Park Service acknowledges that Housekeeping Camp provides economically priced accommodations and a unique overnight experience in Yosemite Valley. In response to public comment, the number of Housekeeping Camp units proposed in the Preferred Alternative has been increased from the *Draft Yosemite Valley Plan/SEIS*. Given the implementation of the River Protection Overlay established by the *Merced River Plan/FEIS*, the total number of units would be 100. Locating Housekeeping units in other areas of the Valley was considered. But given constraints on developable land and corresponding reductions in other facilities that would have to take place, the numbers of overnight accommodations (camping and lodging) proposed in the Preferred Alternative is felt to be an appropriate mix of overnight experiences.
(Also see response to concern # 21.)

693. Public Concern: The *Yosemite Valley Plan* should require fire pits be eliminated from Housekeeping Camp .

"I heard that a representative of the Sierra Club said the biggest problem with the Housekeeping facility was the fire pits. I have always been opposed to them because they create so much smoke that lingers in the trees and the valley. But do not take out sites to reduce fire pits. Leave the sites and take out all the fire pits" (Individual, Los Alamitos, CA - #5574)

Response: This concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan*. The ability to have a camp-like experience without requiring extensive camping gear is part of the unique character of Housekeeping Camp. The management of campfires, including those at Housekeeping Camp, is an operational issue. Campfires are already regulated in Yosemite Valley.

72. Public Concern: The *Yosemite Valley Plan* should reduce the number of Housekeeping Camp lodging units.

"It is recognized that the River Protection Overlay is necessary, and that it . . . provides the opportunity to remove many of the House Keeping units. We would agree with this facility being reduced to the absolute minimum." (Individual, San Jose, CA - #139)

"Regardless of its value as a place for communal and family camping in Yosemite Valley, Housekeeping Camp should not be retained. It should be removed entirely, because it is an eyesore and affront to the river. Why stop at removing all but 52 sites? They all should be removed. The remaining 52 sites would only reinforce the notion that they are provided as private camping for the rich, as that's who will make sure they do what's necessary to get the few remaining prime spots a year and a day in advance." (Individual, CA - #7215)

Response: In response to public comment regarding this economically priced accommodation that provides a unique overnight experience in Yosemite Valley, the number of Housekeeping Camp units proposed in the Preferred Alternative has been increased. Given the implementation of the River Protection Overlay established by the *Merced River Plan/FEIS*, the total number of units would be 100. With the constraint of the River Protection Overlay, however, the number of units would remain less than at present.
(Also see response to concerns # 21 and # 73.)

732. Public Concern: The *Yosemite Valley Plan* should retain existing rustic lodging units at Curry Village.

“It is less clear why the Park Service wishes to remove 277 rustic tent cabins at Curry Village and replace them with eighty-one new and more expensive ‘economy’ units. The Curry Village tent cabins are popular with overnight Park guests, despite the fact that they lack private bathrooms, and they offer the cheapest form of lodging within Yosemite. We therefore support the retention of ninety additional rustic units at Curry Village, even at the expense of the proposed new ‘economy’ units, to better ease the public’s transition to this plan and to ensure a sufficient range of accommodation choices available to overnight Park visitors.” (Conservation Organization, San Francisco, CA - #4594)

RELOCATE CURRY VILLAGE TENT CABINS PROPOSED FOR REMOVAL

“If the tent-cabins are being removed from the Curry area for geological safety issues, could they not be relocated somewhere else?” (Conservation Organization, San Francisco, CA - #4594)

Response: In response to public comments about retaining tent cabins that are part of the Curry Village Historic District (a cultural highly valued resource), that provide quality park experiences, are economically priced, and provide unique overnight experiences in Yosemite Valley, the number of tent cabins at Curry Village has been increased in the Preferred Alternative of the *Final Yosemite Valley Plan/SEIS*.

(Also see response to concern # 21.)

119. Public Concern: The *Yosemite Valley Plan* should require a reduction in the number of Curry Village tent cabins.

“Reduce the tents at Curry Village by at least 1/2. There are way too many tents [and] . . . too many people.” (Individual, Westlake Village, CA - #481)

“Follow through on the plan to cut down on the number of tents in Curry village. It sounds like the only way to save the park.” (Individual, No Address - #4954)

Response: The Preferred Alternative of the *Final Yosemite Valley Plan/SEIS* (see Vol. IA, Chapter 2, Alternatives, Visitor Services—Lodging) calls for a reduction in the number of Curry Village tent cabins from 420 to 174. In response to public comments advocating the retention of more of this economical lodging type, the Preferred Alternative was revised to remove 24 fewer of these cabins. This would further help maintain the integrity of the Curry Village Historic District and enhance the visitor experience provided by this type of lodging. These actions comply with the 1992 *Concession Services Plan*, which proposed similar reductions, citing rockfall hazards and crowding as the two most pressing issues at Curry Village.

(Also see response to concern #626 and #732.)

626. Public Concern: The *Yosemite Valley Plan* should require the reduction in density of Curry Village tent cabins.

“As for the tent cabins at Camp Curry, most of its customers stay there because that’s all they could find, not because of its low price. They stay there because they couldn’t find a room with private bath elsewhere in Yosemite Valley. . . They dislike the shared baths (who wants to use a sink that someone else has just shaved in, or walk barefoot on muddied floors?) They dislike the noisy tent cabins that are set side by side in rows. . . People on vacation don’t want confrontations and Camp Curry (as it is laid out today and as how society has changed) is a platform for confrontations. What should be done to improve the tent cabin experience and reduce confrontations would be to reduce their density by two-thirds . . . Reducing the density of tent cabins and moving them farther away from each other would improve the experience.” (Individual, No Address - #7215)

Response: Curry Village is included in the National Register of Historic Places, and as such, will be managed to preserve and rehabilitate its historic character. Since it is the most intact historic tent camp in



the National Park Service, it is considered a highly valued resource and will be managed for its unique and historic visitor experience. Part of this historic character is the density and configuration of the tent cabins, which would be retained. However, they would be reduced in number to 174 in the Preferred Alternative.

(Also see response to concern #119 and #732.)

628. Public Concern: The *Yosemite Valley Plan* should require that dormitory-style accommodations for educational groups be separate from standard tent cabins at Curry Village.

“As for the tent cabins at Camp Curry, most of its customers stay there because that’s all they could find, not because of its low price. . . They did like the noisy and disruptive youth groups who keep them awake at night . . . People on vacation don’t want confrontations and Camp Curry (as it is laid out today and as how society has changed) is a platform for confrontations. What should be done to improve the tent cabin experience and reduce confrontations would be to . . . place student and youth groups in separate dormitory-styled accommodations. . . Separating youth groups from other visitors (by placing them in dormitory buildings designed for student stays) would improve their visits and lessen their conflicts.” (Individual, No Address - #7215)

Response: The constraints on developable land in Yosemite Valley are such that construction of dormitory style accommodations for educational groups to be used for only part of the year cannot be achieved without prohibiting other types of lodging accommodations that would be used throughout the year. Although potential conflicts may exist at Curry Village, operational responses to address such conflicts are beyond the scope of this planning effort.

4.12.3.c ~ Hard-sided Lodging Accommodations

The types of hard-sided accommodations available in Yosemite Valley are central to the comments of several people addressing lodging facilities. Some of these respondents recommend that the National Park Service establish lodging accommodations with shared facilities, such as hostel-style units. Such shared facilities would be more affordable and have a smaller developed footprint than other types of hard-sided units, these hostel proponents contend. Offering a site-specific suggestion, one organization recommends the retention of the Ahwahnee Row houses as “hostel-style facilities or other inexpensive lodging.” Focusing on a different type of hard-sided lodging, other individuals ask that the National Park Service maintain some cabin lodging in Yosemite Valley, particularly at Curry Village. Some of these people cite use by the Yosemite Institute as a good reason for maintaining Curry Village cabins, while others feel that these rustic cabins make for a unique and valuable experience.

The Curry Village tent cabins are the subject of other comments regarding hard-sided lodging accommodations. Some of the Curry Village cabins “need to be remodeled or replaced,” one person contends. Proposing a somewhat different management suggestion, another individual suggests converting some of the Curry Village tent cabins to cabins without baths.

Another site respondents frequently address is Yosemite Lodge. Most of these people oppose National Park Service plans for the Yosemite Lodge area. Capturing a common sentiment, one organization states, “At this time we oppose the construction of any and all new units at the Lodge. Although the retention of existing units is perhaps justifiable, the building of 141 new units is unacceptable . . . The scale of this new construction is highly inconsistent with the overarching goal of removing development out of the Valley. . . The admirable goals of both the GMP and the current draft YVP—reclaiming priceless natural beauty, allowing natural processes to prevail, and reducing traffic and crowding—can only be fully accomplished by relocating all nonessential permanent functions and structures outside the Valley.” The new proposed units at

Yosemite Lodge are unnecessary given the availability of lodging outside Yosemite National Park, this group also contends.

Addressing other Yosemite Lodge development concerns, some respondents feel that the proposed development excessively increases the developed footprint of the lodge complex. In particular, the four-plex cabins proposed for the lodge inordinately increase development, one of these individuals claims. Offering more specific recommendations on limiting lodge development, some people suggest that the National Park Service not replace any lodging units damaged by the 1997 floods. Another person believes lodge expansion near Camp 4 (Sunnyside Camp) should not occur because “the unique character of Camp 4 would be ruined by the proximity of the suggested expansion of the lodge.” Similarly, one respondent asserts, “Without a doubt, the lodge complex, right there in the center of the Valley in front of Yosemite Falls, is the Valley’s major eyesore.” Submitting the most drastic proposal, this individual suggests that the National Park Service remove Yosemite Lodge from the Valley. Still another conservation organization opposed to expansion of lodge facilities insinuates that proposals for lodge development fail to meet the requirements of the National Environmental Policy Act. This group suggests the National Park Service consider the impacts of building fewer units at Yosemite Lodge than contained in any of the Plan alternatives.

In contrast to those who are against proposed additions to Yosemite Lodge facilities, a few respondents support the establishment of additional units at the lodge. “I recommend that more lodging be added to the Yosemite Lodge so that the amount of lodging in the Valley stays closer to the current amount,” one of these people states. Addressing specific lodge facilities, other advocates of increased accommodations suggest that lodge cabins be restored. In a more modest proposal, another respondent requests that the lodge be maintained in its current condition.

Affordability of accommodations is critical for many people who comment on Yosemite Lodge management proposals. Most of these respondents recommend an increase in the number of economy units at the lodge. “The mix of rooms at the lodge should be adjusted to reduce mid-range accommodations and increase the number of economy-styled motel rooms with private baths,” one such person asserts. Another individual also recommends increasing the number of economy rooms but suggests that these units be rooms without private baths. This person contends that private baths not only “increase the cost of the lodging” but also “increase the footprint” of lodging facilities.

In addition to those who comment on Curry Village and Yosemite Lodge accommodations, many respondents specifically address management of The Ahwahnee. These people offer a significant range of management alternatives for The Ahwahnee. Some respondents argue that the Ahwahnee enables those who are not “young and vigorous” to better enjoy their Yosemite visits. They recommend the retention of the hotel in its current condition. Conversely, others believe this structure should be removed from the Valley. “The structure does not promote the purpose of a resource-based visitor experience. The Ahwahnee customer wants the experience of staying in a 5-diamond hotel with world-class dining, beautiful Sierra scenery and first-rate service. The Ahwahnee Hotel could be moved, reconstructed, or replicated on any of a hundred sites in the Sierra with no loss to its clientele.” This person also cites the hotel’s location in a highly valued resource area, as justification for its removal. As with other accommodations, affordability is also a concern of some respondents commenting on The Ahwahnee. One such person suggests that all new units at the lodge be small, affordable rooms.



One discrete recommendation regarding the location of hard-sided accommodations completes this section. A few people suggest that the National Park Service encourage the development of hard-sided lodging accommodations outside the Yosemite National Park instead of in Yosemite Valley.

667. Public Concern: The *Yosemite Valley Plan* should establish lodging accommodations with shared facilities in Yosemite Valley.

“Instead of building more hotel/motel units at Yosemite Lodge, build hotel style accommodations--shared units w/ same kitchen, shared bath, large rooms w/ bunk bed--there are ample hotel/motel accommodations in El Portal & Oakhurst.” (Individual, No Address - #5304)

Response: Based on public comments received, the Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* has been revised to propose that no additional motel or hotel structures be built in Yosemite Valley. All replacement lodging rooms would be built using smaller structures that provide closer relationships between the lodging room and the natural environment, thereby providing a more characteristic park experience. Accommodations with shared baths and common areas currently exist at Curry Village and Housekeeping Camp although no common kitchens exist. (Also see response to concern # 733.)

733. Public Concern: The *Yosemite Valley Plan* should establish hostel-style accommodations in Yosemite Valley.

“Consider dorm-style shared-bath ‘hostels’ as a higher density, budget accommodation option. In addition to being more affordable, this type of structure would occupy a smaller footprint than tent cabins, housekeeping units, or fancy Lodge ‘cottages.’ More acreage would be opened up for restoration. Yosemite Institute students could occupy these units during the school year, and they would revert to employee housing or visitor hostels during the summer.” (Individual, El Portal, CA - #9013)

“My second idea is accommodations for economic lodging. If there’s a possibility of hostel-style lodging, which is basically buildings which have dorm rooms, single rooms, rooms for two people, et cetera, that would be able to contain more people in those settings versus like Housekeeping which is more spread out, and it’s harder to monitor impacts of people in those areas.” (Public Hearing, San Diego, CA - #20444)

Response: New construction of a large facility that could serve as a hostel was considered during this planning process. However, based on public comments received, the Preferred Alternative in the *Final Yosemite Valley Plan/SEIS*, has been modified to reflect that no additional large-scale lodging structures, such as motels or hotels, would be built in Yosemite Valley. All replacement lodging rooms would be built using smaller scale structures that provide a closer relationship between the lodging room and the natural environment, thereby providing a more characteristic park experience. Hostels are often located in large structures or complexes, for which an adaptive use is being sought. No vacant facility would be retained in Yosemite Valley that would lend itself to use as a hostel. Given the limitation on developable land, any accommodation of a hostel experience would require a direct tradeoff with other types of experiences.

512. Public Concern: The *Yosemite Valley Plan* should require the retention of the Ahwahnee Row houses.

“Our organizations could support retention of the Ahwahnee row houses if they are used for appropriate purposes, and not maintained simply to provide nicer accommodations for NPS or YCS employees, for example. We would consider using them as hostel-type facilities or other inexpensive lodging to be more appropriate (as well as a means to offset some of the reductions in lodging we have called for).” (Conservation Organization, San Francisco, CA - #4594)

Response: In the Preferred Alternative of the *Final Yosemite Valley Plan/SEIS* the National Park Service proposes to retain the Ahwahnee Row houses. These would be retained to address critical housing needs. Visitor services for lodging would continue to be accommodated in lodging areas such as Yosemite Lodge, Curry Village, and The Ahwahnee. Housing retained in Yosemite Valley would accommodate the minimum needs for valley services, and not just provide nicer accommodations for employees.

117. Public Concern: The *Yosemite Valley Plan* should retain cabin lodging units in Yosemite Valley.

“Recently I was informed of the new Yosemite Valley Plan (YVP), which amazingly includes removing the cabins in the Valley which I personally stayed in March of 1999. I, frankly, am appalled at this idea. I believe that to do this would be an incredibly unwise decision, especially if one of the goals of the Yosemite Institute is to teach others about nature, and the beauty it holds. [I] implore you: Do not remove the cabins! The goals set out in the 1980 General Management Plan are excellent goals, but they should not be achieved by destroying future generations’ Yosemite experiences. Please, if visitors’ opinions count: leave the cabins in the valley!” (Individual, No Address - #3661)

RETAIN THE CURRY VILLAGE CABINS

“The removal of any of the cabins at Camp Curry would be absolutely horrible. Their charm, the delight of experiencing a stay in ‘cabin in the woods’ is one of the most valued parts of a visit to Yosemite to so many people we know. . . We realize that the number of tent cabins may have to be reduced for many reasons, but please keep the wooden old cabins with a minimum of modernization. Their link with the past will be appreciated more with each future generation. A modern hotel room will never compare for many people. Too often we eliminate these historic elements in the name of practical progress, only to regret their loss in the future.” (Individual, Thousand Oaks, CA - #5)

Response: In order to help maintain the integrity of the Curry Village Historic District, a cultural highly valued resource, all existing cabins in Curry Village would be retained in the Preferred Alternative.

624. Public Concern: The *Yosemite Valley Plan* should improve the Curry Village cabins.

“Upgrade Curry Village cabins, some need to be remodeled or replaced.” (Individual, Minden, NV - #6272)

Response: The 1992 *Concession Services Plan* recognized that work needed to be done on the existing cabin-with-bath units at Curry Village and called for their rehabilitation. Under the Preferred Alternative in the *Final Yosemite Valley Plan/SEIS*, new cabin-with-bath units would be constructed and the existing cabins would remain and be rehabilitated.

(Also see response to concern #617.)

617. Public Concern: The *Yosemite Valley Plan* should require that some Curry Village tent cabins be converted to cabins without baths.

“Curry Village tent cabins: . . . Convert 200 tent cabins to hard sided cabins without bath.” (Individual, Lafayette, CA - #4499)

Response: Under the revised Preferred Alternative in the *Final Yosemite Valley Plan/SEIS*, the National Park Service would rehabilitate existing facilities and add some new facilities to Curry Village. The National Park Service would strive to retain the historic character of the Camp Curry Historic District (which is listed in the National Register of Historic Places and is the most intact historic tent camp in the National Park Service), and continue this unique historical lodging experience. The National Park Service would accomplish this by retaining 174 tent cabins (a major character-defining feature of the district); retaining and rehabilitating the 80 existing cabins without bath; rehabilitating the existing historic wood



bungalows; rehabilitating the historic residential units and adaptively reusing them as lodging units; and rehabilitating the historic commercial facilities. New cabin units with bath would be constructed in the historic district to provide additional lodging opportunities.
(Also see response to concern #622.)

243. Public Concern: The *Yosemite Valley Plan* should limit the number of lodging units added to the Yosemite Lodge complex.

“Neither restoration nor natural processes are served by adding 141 new or reconstructed units to Yosemite Lodge, however. As a result, at this time we oppose the construction of any and all new units at the Lodge. Although the retention of existing units is perhaps justifiable, the building of 141 new units is unacceptable for several important reasons. First, the scale of this new construction is highly inconsistent with the overarching goal of removing development out of the Valley. As discussed above, the admirable goals of both the GMP and the current draft YVP—reclaiming priceless natural beauty, allowing natural processes to prevail, and reducing traffic and crowding—can only be fully accomplished by relocating all non-essential permanent functions and structures outside the Valley. Only then can visitors obtain the kind of quiet, natural, and reflective experience the national parks were set aside to provide. Our organizations do not believe the Yosemite Lodge qualifies as such an essential permanent structure. Yosemite Lodge appears to have been made superfluous by ‘mid-scale’ accommodations at El Portal, Mariposa, Oakhurst, and other areas. There are not less than five full-scale motels just outside the Valley (Yosemite View Lodge, Best Western Yosemite Way Station, Comfort Inn Mariposa, Cedar Lodge, and Comfort Inn of Oakhurst), and accommodations are available at no less than eighty-nine other nearby locations. These facilities are easily connected to the Valley by YARTS (or, at worst, satellite parking), thus reducing automobile and air pollution levels in the Valley. They require no NPS or YCS employees to service them, reducing the need to build expensive new employee housing in the Valley or El Portal.” (Conservation Organization, San Francisco, CA - #4594)

“For Yosemite Lodge we favor the 386 units of Alternatives 2, 3, and 4 over the 440 units of Alternative 5. Why? The 15 four-plex cabins of Alt. 5 would add significantly to the footprint of Yosemite Lodge and 386 is plenty by any standard. The 2 and 3 story additions are not offensive to us. The same number of units in a single story structure would enlarge the footprint too much.” (Individual, Oakhurst, CA - #3379)

DO NOT REPLACE UNITS DAMAGED IN 1997 FLOODS

“Do not rebuild Yosemite Lodge units damaged by the 1997 flood.” (Individual, Albany, NY - #1837)

LIMIT EXPANSION TOWARD CAMP 4

“Expanding the lodge up against camp 4 should not even be considered. The unique character of camp 4 would be ruined by the proximity of the suggested expansion of the Lodge.” (Individual, Berkeley, CA - #9238)

Response: In response to public comment regarding Yosemite Lodge, the total number of lodging rooms has been reduced from the 386 units proposed in the Preferred Alternative presented in the *Draft Yosemite Valley Plan/SEIS*, to 251 units in the *Final Yosemite Valley Plan/SEIS* Preferred Alternative. Yosemite Lodge would not be reconstructed to the extent that existed prior to the 1997 flood; new units would be constructed outside the 100-year floodplain and the River Protection Overlay, as prescribed in the *Merced River Plan/FEIS*.

(Also see responses to concerns #21, #83, #144, and #1114.)

691. Public Concern: The *Yosemite Valley Plan* should require the removal of Yosemite Lodge.

“I recommend that the entire Lodge complex be torn down and restored to natural conditions -- possibly replaced by a small campground. Without a doubt, the Lodge complex, right there in the center of the Valley in from of Yosemite Falls, is the Valley’s major eyesore.” (Individual, San Francisco, CA - #7154)

Response: With increasingly available regional transportation and the development of recreation, lodging, and camping facilities in gateway communities, visitors are no longer dependent on overnight accommodations (camping and lodging) within Yosemite Valley during a visit to Yosemite National Park. Nonetheless, the National Park Service recognizes that there is great value in being able to experience the Valley in the evening, night, and early morning, and overnight accommodations facilitate this special experience for park visitors. Determining the appropriate amount and types of overnight accommodations to provide a quality experience remains a challenging issue. Proposals for new lodging units at Yosemite Lodge in the *Draft Yosemite Valley Plan/SEIS* have been changed in the *Final Yosemite Valley Plan/SEIS*. The Preferred Alternative would provide for overnight experiences that allow more direct access to and connection with park resources. Lodging units at Yosemite Lodge would contribute to the diversity of lodging types and costs desired for Yosemite Valley.
(Also see response to concern #120.)

471. Public Concern: The National Park Service should analyze the impacts of building fewer Yosemite Lodge units than allowed in the *Yosemite Valley Plan*.

“We also believe that the subsequent NEPA review document should analyze the impacts of building fewer units at the Lodge than allowed by this draft plan. The Council on Environmental Quality (CEQ) has indicated that the NPS must analyze and compare a ‘reasonable number of examples covering the full spectrum of alternatives.’ The CEQ regulations also require the Service to ‘rigorously explore and objectively evaluate all reasonable alternatives,’ and have stated that this exploration is the ‘heart’ of the NEPA process. We believe that the 1997 flood opened for consideration alternatives not previously available to the NPS, and that the Park Service should seize the opportunity, either now or in a supplemental NEPA process, to initiate an open and honest public discourse regarding the proper size of Yosemite Lodge.” (Conservation Organization, San Francisco, CA - #4594)

Response: Based on public comment and the new River Protection Overlay identified in the *Merced River Plan/FEIS*, the design and experience of the Yosemite Lodge under the Preferred Alternative has been modified. See Vol. IA, Chapter 2, Alternatives, Alternative 2—Visitor Services—Lodging, for more details on the proposed lodging modifications. Also see Vol. IB, Chapter 4, Environmental Consequences, Alternative 1, for an analysis of impacts of the No Action Alternative, which would provide fewer units than proposed in the Preferred Alternative.

Note: One response is provided for concerns #459 and #120, and is placed following concern #120.

459. Public Concern: The *Yosemite Valley Plan* should establish additional lodging units at Yosemite Lodge.

“I recommend that more lodging be added to the Yosemite Lodge so that the amount of lodging in the Valley stays closer to the current amount rather than the significant reduction proposed under Alternative 2.” (Individual, Sacramento, CA - #5586)

RESTORE CABINS IN THE YOSEMITE LODGE AREA

“Restore Yosemite Lodge cabin area.” (Individual, Glendale, CA - #3682)

“The cabins at Yosemite Lodge should be replaced if they can be without going into the flood plain.” (Individual, Modesto, CA - #3538)

Response: See response following concern #120 below.



120. Public Concern: The *Yosemite Valley Plan* should retain the Yosemite Lodge in its current condition.

“Yosemite Lodge is not a run-down or decrepit facility needing replacement. It is relatively new, modern, and functional. It is a beautifully designed facility that can provide service and enhance visitors experience for years to come. It should be preserved in its present form.” (Individual, Los Angeles, CA - #470)

Response: The number of existing Yosemite Lodge buildings to be retained in the Preferred Alternative has changed from the *Draft Yosemite Valley Plan/SEIS*. The total number of rooms called for in the *Final Yosemite Valley Plan/SEIS* is 251, reduced from the 386 proposed in the *Draft Yosemite Valley Plan/SEIS*. This change has, for the most part, been in response to updated information on the 100-year floodplain and the River Protection Overlay established by the *Merced River Plan/FEIS*. Other changes are to provide better design of replacement facilities to allow for maximum resource protection and more efficient design of facilities. New units at Yosemite Lodge would be designed to provide a greater connection to park resources than present or previously proposed motel units.

This response also applies to concern #459.
(Also see response to concern # 21.)

144. Public Concern: The *Yosemite Valley Plan* should emphasize affordability in new accommodations at Yosemite Lodge.

“I am sure that changes need to be made at the Lodge, but keep accommodations within the price range of the middle class family.” (Individual, Lodi, CA -#2318)

“There’s nothing wrong with the idea that there should be more rooms for low-income visitors, but if so, there should not be more Housekeeping Camp units nor more tent cabins (rooms without bath). Instead, the mix of rooms at the Lodge should be adjusted to reduce mid-range accommodations and increase the number of economy-styled motel rooms with private baths (similar to Motel 6 or Econolodge).” (Individual, No Address - #7215)

ESTABLISH ROOMS WITHOUT BATHS IN YOSEMITE LODGE

“The 192 new Yosemite Lodge rooms called for in alternative 2 (page 2-40) should be economy rooms with common baths rather than mid-scale rooms with private baths. I am well aware of the ‘clear guest preference for accommodations with [private] baths’ (page III-84). . . The private baths increase the cost of the lodging. They increase the footprint of the structure. They increase the obtrusive development both directly and through the multiplier effect. There are tens of thousands of lodgings in the United States, but there is only one Yosemite Valley. If private baths are so extraordinarily important to some visitors, they can lodge elsewhere. There is no goal, no principle, no criterion listed in the YVP that demands rooms with private baths.” (Individual, Oberlin, OH - #580)

Response: In response to public comments regarding economically priced accommodations that provide a quality park experience, specifically those at Yosemite Lodge, the numbers of economy rooms at Yosemite Lodge have been increased from the Preferred Alternative in the *Draft Yosemite Valley Plan/SEIS*. The number of economy units proposed has increased from 90 in the *Draft Yosemite Valley Plan/SEIS* to 117 in the *Final Yosemite Valley Plan/SEIS*.
(Also see response to concerns #21 and #83.)

331. Public Concern: The *Yosemite Valley Plan* should retain The Ahwahnee in its current condition.

“Please don’t do anything to the Ahwahnee. Not all of us are young and vigorous mountain climbers, backpackers, wilderness hikers, bike riders. Some of us have physical disabilities and simply enjoy the beauty of Yosemite from a table at the Ahwahnee or from their outside--in their patio. I think there’s room for all of us.” (Public Hearing, Sonora, CA - #20285)

Response: The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* retains and protects The Ahwahnee, a National Historic Landmark.

218. Public Concern: The National Park Service should remove the Ahwahnee Hotel from the highly valued resource area.

“Vol. 1A, Chapter 1, Direction For This Planning Effort, Criteria, Protection of natural and Cultural Resources: ‘Remove facilities . . . Outside of highly valued resource areas . . . ‘ Vol. 2C, Plate C, shows the Ahwahnee Hotel standing directly within a highly valued resource environment. This structure should be removed. Vol. 1A, Chapter 1, Need for Action: ‘ . . . and at the same to welcome visitors, provide equitably for their park-related needs, and offer a range of resource-based recreational opportunities . . . ‘ A structure the size of the Ahwahnee accommodating such a small number visitors limits, rather than welcomes visitors. The hotel does not contribute to any resource-based recreational experiences, anything associated with such experiences, nor provide for any such experiences equitably. Vol. 1A, Chapter 1, Direction For This Planning Effort, Goals, Reclaim priceless natural beauty: ‘This beauty is made up . . . Meadows . . . ‘ Removing the Ahwahnee, it’s parking areas and roads would allow restoration of this meadow. Vol. 1A, Chapter 2, Table A Summary of Alternatives, Visitor Experience, Visitor Services, Lodging, The Ahwahnee, Alternative 2: Demolish or remove the Ahwahnee. The structure does not promote the purpose of a resource-based visitor experience. The Ahwahnee customer wants the experience of staying in a 5-diamond hotel with world-class dining, beautiful Sierra scenery and first-rate service. The Ahwahnee Hotel could be moved, reconstructed or replicated on any of a hundred sites in the Sierra with no loss to its clientele.” (Individual, Livermore, CA - #3091)

Response: The Ahwahnee is a designated National Historic Landmark and is itself a highly valued resource and the Ahwahnee area is highlighted as a highly valued resource on Plate C (see Vol. 1C). The structure, designed by architect Gilbert Stanley Underwood, is an example of the rustic design style used in Yosemite Valley. The hotel is also significant because of the innovative use of materials employed during its construction in 1927. National Park Service policy guides the care of the nation’s important historic resources. The National Park Service is also mandated under the National Historic Preservation Act to protect and preserve National Historic Landmarks to the maximum extent possible.

701. Public Concern: The *Yosemite Valley Plan* should require that new units at The Ahwahnee be smaller, affordable rooms.

“Regarding the Ahwahnee Hotel-seems to me the mortgage must be long paid off on this property. Why do the rooms have to be that expensive? If it needs re-modeling inside then the new rooms could be smaller (who wants to stay in their rooms anyway) and more people could be accommodated at more reasonable prices and the footprint wouldn’t change.” (Individual, Palo Alto, CA - #4397)

Response: This concern is acknowledged; however, within the scope of this planning process, there are no new units proposed for The Ahwahnee. The 1992 *General Management Plan*, as amended by the 1992 *Concession Services Plan*, expresses the intent of providing a diversity of lodging opportunities in Yosemite National Park. The Ahwahnee is at the high-cost end of this spectrum. Rates are comparable to other grand hotels and equivalently rated lodging establishments in California.

699. Public Concern: The National Park Service should encourage the development of lodging accommodations outside Yosemite National Park.

“Don’t build larger accommodations in the Valley. Encourage hotel/motel ventures outside the Park.” (Individual, Escondido, CA - #5651)

Response: The development of lodging on private lands outside of Yosemite National Park is outside the scope of the *Yosemite Valley Plan*. With increasingly available regional transportation and the development of recreation, lodging, and camping facilities in gateway communities, visitors are no longer dependent on overnight accommodations (camping and lodging) within Yosemite Valley in order to visit



Yosemite National Park. Nonetheless, the National Park Service recognizes that there is great value in being able to experience the Valley in the evening, night, and early morning, and overnight accommodations facilitate this special experience for park visitors. Determining the appropriate amount and types of overnight accommodations to provide a quality visitor experience remains a challenging issue.

Target numbers of campsites and lodging units were established through a public process in the 1980 *General Management Plan*. The number of lodging units was further refined in the 1992 *Concession Services Plan*. The *Final Yosemite Valley Plan/SEIS* also proposes to vary the number of campsites and lodging units in an effort to improve the quality of visitor experiences while protecting and preserving resources for future generations. Decisions on the number and type of visitor accommodations must be based on resource and site condition. These conditions include floodplains and geological hazard areas (see Vol. IA, Chapter 2, Alternatives, Developing a Range of Alternatives, Development Considerations), as well as the quality of the overnight experience and how closely it relates to the park and the immediate environment.

4.12.4 ~ Visitor Facilities

Public comment analyzed in this section comprises concerns related to visitor service facilities. The analysis to follow is divided into several parts: general management direction, park facilities, health and safety, and concession services. For concerns regarding camping and lodging facilities, refer to Sections 4.12.2 and 4.12.3.

4.12.4.a ~ General Management Direction

Several people express concern about the construction, removal, restoration or maintenance of Yosemite Valley structures and facilities. For new construction in the Valley, one respondent would like to see environmentally sound construction practiced to avoid “the sort of incredible waste and destruction apparent at Happy Isles.” The Madera County Board of Supervisors recommends that the National Park Service conduct in-depth studies evaluating all Yosemite Valley structures for possible removal. “I don’t believe we should just get rid of everything because it may be in need of repairs,” one person attests. “Eliminating is just going around the problem, not solving it.” This person suggests restoring structures instead of removing them. One individual asserts that facilities, such as the restrooms at Curry Village, require more frequent cleaning and monitoring.

105. Public Concern: The *Yosemite Valley Plan* should require environmentally sound construction practices in Yosemite Valley.

“I would hope that the sort of incredible waste and destruction apparent at Happy Isles due to recent construction is not repeated. . . How can such a concerned, erudite and educated staff allow such a situation to occur? Analogous to the time a ‘permit to build’ was issued in 1980 and they destroyed a meadow and built a motel so fast the State EPA didn’t have time to file grievance (until after the fact). And it’s still there! A constant vigilance must be maintained or the indiscretions will occur.” (Individual, Berkeley, CA - #394)

Response: Implementation of the *Yosemite Valley Plan* would incorporate best management practices and adhere to a comprehensive development plan. Prior to any construction, a site plan would be developed in compliance with the National Environmental Policy Act (NEPA) process. There would be appropriate oversight with assurances that sustainable practices and energy conservation are part of the design criteria (see Vol. IA, Chapter 2, Alternatives, Mitigation Measures, in the *Final Yosemite Valley Plan/SEIS*).

350. Public Concern: The National Park Service should evaluate the possibilities for removal of Yosemite Valley structures.

“Conduct in-depth study of all in-valley structures, evaluating possibilities for removal (e.g., Federal Court, NPS/YCS management housing, retail facilities, etc.).” (Madera County Board of Supervisors, Madera, CA - #4284).”

Response: The National Park Service has evaluated all Valley structures as part of this planning process. Individual structures were evaluated based on the following criteria:

Does the function need to be located in the Valley?

What is the location with respect to highly valued resources?

What is the location with respect to the River Protection Overlay?

What is the proximity to the 100-year floodplain?

What is the proximity to mapped geologic hazards?

697. Public Concern: The National Park Service should consider restoring structures in Yosemite Valley.

“Restoration or the building of structures in the Valley is more of what is needed. Most of the buildings are old and they are still needed. I don’t believe we should just get rid of everything because it may be in need of repairs. Eliminating is just going around the problem not solving it.” (Individual, Yosemite National Park, CA - #5898)

Response: The great majority of historic structures in Yosemite Valley would be preserved under the Preferred Alternative in the *Final Yosemite Valley Plan/SEIS*. Facility replacement is generally occurring only when facilities are in highly valued resource areas, are in the River Protection Overlay, are in the high-hazard rockfall zone or 100-year floodplain, or are required to be removed to more efficiently or effectively designed facilities for a particular site.

325. Public Concern: The National Park Service should improve the maintenance of public facilities in Yosemite Valley.

“We have always loved Curry Village as a family camp. The tent-cabins are basic, but comfortable. In previous years, we have enjoyed clean bathrooms and gathering in the dining room to enjoy ‘family-style’ eating. This year, however, there is some kind of new management. The results are this: filthy bathrooms, all hours of the day and evening. Toilet paper everywhere, toilets backed up, and human waste flowing on the floors. No apparent effort or attention made to remedy the problems. Prior years we would notice frequent cleaning and monitoring of these facilities. The showers, which used to be kept clean, were found to be very mildewy.” (Individual, Encinitas, CA - #20461)

Response: The day-to-day maintenance of concessioner facilities is outside the scope of the *Yosemite Valley Plan*. The park’s contract with the primary concessioner requires maintenance to be provided at established standards; the National Park Service manages this contract through facility inspections and administrative procedures. Visitors are urged to inform both the concessioner and the National Park Service when problems are encountered.

4.12.4.b ~ Park Facilities

The National Park Service provides a variety of facilities to enhance the visitor experience in Yosemite Valley. Many respondents offer suggestions regarding the future management of these facilities. The park service should be required to develop multi-use facilities for visitor and



community use, some people attest. Directing attention to the limitation of existing facilities, one person urges that the National Park Service develop a new community center. Auditoriums are also important to several people who ask that management of these “valuable buildings” be addressed in the *Yosemite Valley Plan*.

A desire for worship facilities informs many respondents’ comments. One religious organization avows that the new auditorium design will not accommodate Catholic Mass and wants to know how the National Park Service plans to meet the spiritual needs of Catholic visitors and residents. The park service should retain the chapel as a Christian place of worship in Yosemite Valley, some people hold, because “The chapel provided an unobtrusive place to reflect and worship together with others, as well as resources for emotional, spiritual, and at times, physical assistance for the people of Yosemite.” Therefore, they profess that a provision addressing the needs of the religious community should be contained in the *Final Yosemite Valley Plan/SEIS*. A five-year conditional use permit for the Yosemite Community Church, another person submits, should be provided by the National Park Service to ensure that a place of worship is available in the Valley. In addition to the Yosemite Chapel, one person writes, the Church Bowl Picnic Area is used for religious experience and should be retained as a religious site. Several individuals also contend that the clergy housing should be retained within Yosemite Valley and recommend relocating the pastor from Wawona to Yosemite Valley during the winter season when roads become impassible.

A number of people propose improvements to Yosemite Valley visitor facilities: drinking water fountains at major trailheads, day camp facilities for children, food storage boxes along backcountry trails, wilderness permit kiosks, additional benches in high traffic areas, and a seasonal post office at Curry Village.

Note: One response is provided for concerns #65, #64, #700, #111, and #309, and is placed following concern #309.

65. Public Concern: The *Yosemite Valley Plan* should establish multi-use facilities in Yosemite Valley.

“Provide a multi-use facility for religious or other groups to use based on the military model whereby many denominations share a facility. Make it large enough for community meetings of most of permanent community. Maybe it could also house indoor recreational facilities and be shared with YCS rec, thus meeting needs of visitors and residents alike.” (Individual, Yosemite National Park, CA - #201)

“It has long been recognized that a Community Center of some sort is sorely needed in Yosemite Valley - a multiple use facility which could serve as a meeting site, fellowship hall, special function site or any number of purposes for which a community comes together. Over the years, there have been discussions about the suitability of facilities already existing for such purposes, including the elementary school gym, NPS auditoriums and the chapel. Interesting to note that over the years, each of these sites has been made available upon request to accommodate meetings, gatherings and functions. Each has built-in logistical, scheduling and infrastructure limitations that preclude them from serious consideration as a Community Center. Therefore, we request that in future planning for Yosemite Valley a Community Center be included.” (Religious Organization, Yosemite National Park, CA - #3567)

AUDITORIUMS

“Auditoriums: did not see plans for these valuable buildings. Programs are a necessary part of the overall park experience, and must be accessible to those staying at the Park. We recently enjoyed the John Muir program and purchased several books to share with friends. We attend Catholic Mass there.” (Individual, Ore Valley, CA - #2794)

Response: See response following concern #309 below.

64. Public Concern: The *Yosemite Valley Plan* should address the needs of religious and spiritual groups in Yosemite Valley.

“It appears that the proposed Yosemite Valley Plans do not make provision for Catholic Church Services. We find this very distressing, as it is a basic and well-understood requirement of the Catholic Church that its members attend Mass every week. The design of the new auditorium will not accommodate Catholic Mass as it has so adequately done in the past. Also, we have heard that the Catholic priest may be removed from Yosemite Valley as well. This means that Catholics will no longer attend church in Yosemite. We are not visitors. We are residents and employees for well over 30 years. Will we be sharing the chapel with other denominations? What is the plan for meeting the spiritual needs of the people?” (Religious Organization, No Address - #339)

Response: See response following concern #309 below.

700. Public Concern: The National Park Service should provide a conditional use permit to the Yosemite Community Church.

“I understand that there is nothing mentioned in the Valley Plan regarding the Yosemite Chapel and that Yosemite Community Church has not had a conditional use permit for the chapel for about five years. I would like to see a conditional use permit in place that allows worship services.” (Individual, No Address - #30240)

Response: See response following concern #309 below.

111. Public Concern: The *Yosemite Valley Plan* should provide for clergy housing in Yosemite Valley.

“I am very concerned about a plan that does not include local housing for clergy. I view the many tragedies, searches, murders, etc. that have taken place in recent years, we need our clergy closer. Also, it is important to the resident community of the Park.” (Individual, Pharr, TX - #428)

Response: See response following concern #309 below.

309. Public Concern: The *Yosemite Valley Plan* should relocate the pastor residence from Wawona to Yosemite Valley.

“Truly strong consideration should be given to relocating the residence for the pastor who is currently housed in Wawona down to Yosemite Valley. During the off-season, during any times of snow, the road, Highway 41, between Wawona and the Valley becomes impassible, and he is often unable to make the connect down there for services or to tend to emergencies down there.” (Public Hearing, Costa Mesa, CA - #20314)

Response: The *Final Yosemite Valley Plan/SEIS* proposes two multi-use facilities to serve community and park needs, functions, and activities. One would be at the Curry Village Cafeteria and the other as part of the new interpretive-education center in Yosemite Village. The multi-purpose use of the latter would be designed to continue the existing agreement with the Fresno Diocese for also serving the religious needs of park visitors and residents as would the Yosemite Chapel. National Park Service management policies provide housing for nongovernment entities that support park operations and needs. Housing for resident ministers that support park operations and the community may be provided in the same manner as for teachers, postal employees, and others who meet park and community needs. (This response also applies to concerns #65, #64, #700, and #111.)

263. Public Concern: The National Park Service should retain the chapel in Yosemite Valley.

“If there is a question about provision for the ongoing use of the Yosemite Chapel in the Valley, I would like to go on record as saying that my visits to Yosemite have been nothing but enhanced when I have attended the services there. I have been completely surprised each and every time I attend. I hope that you will continue to grant its



heritage as a Christian house of worship amidst the natural beauty that only exists in your park.” (Individual, No Address - #3501)

“I would like to point out a concern regarding one of the landmarks in the Valley, the Chapel. The local community has used it for decades, as well as the community at large who come to visit, and at this point there is not a provision in the Plan for its continued use as it was originally intended, as a Christian place of worship. . . The Chapel provided an unobtrusive place to reflect and worship together with others, as well as resources for emotional, spiritual, and at times, physical assistance for the people in Yosemite. . . The Chapel and staff greatly contribute to that feeling by meeting needs of community members, and I request that a provision be written into the Valley Plan for the continued use of the building as it was originally intended.” (Individual, Oakhurst, CA - #4485)

Response: The National Park Service does not call for the removal of the Yosemite Chapel or a change in the functions performed at the chapel under the *Final Yosemite Valley Plan/SEIS*.

265. Public Concern: The *Yosemite Valley Plan* should retain the Church Bowl Picnic Area as a religious site.

“Church Bowl Picnic Area: The Church Bowl stands out as a favorite outdoor site for visitor’s religious experience. It is located away from the more crowded areas in the Valley, and is constructed in a way that honors the cathedral effect of nearby granite walls. Its effects run deep.” (Individual, Seattle, WA - #1354)

Response: The use of park facilities for organized religious services is an operational issue, based in law, policy, and regulation, and is outside the scope of the *Yosemite Valley Plan*. The *Final Yosemite Valley Plan/SEIS* would impose no restrictions on facility use beyond those resulting from other actions based on land-use. In the Preferred Alternative of the *Final Yosemite Valley Plan/SEIS*, the Church Bowl Picnic Area would be restored to natural conditions and formal picnic facilities removed. Picnicking would be available near the day-visitor parking area in Yosemite Village.

112. Public Concern: The *Yosemite Valley Plan* should provide drinking water at trailheads in Yosemite Valley.

“With the removal of food service at Happy Isles, there is one loss that you might want to make up for. From my own experience, having drinking water at Happy Isles is very important to people coming off the trail dehydrated. Perhaps you can add more drinking fountains?” (Business, Yosemite National Park, CA - #385)

Response: The siting of drinking water fountains at trailheads in Yosemite Valley is at a level of detail beyond the scope of the *Yosemite Valley Plan*. Several areas do have drinking water fountains, such as Happy Isles, the Vernal Fall footbridge, and Lower Yosemite Fall parking area. All of these locations are close to existing waterlines and are in heavily used areas. The National Park Service strongly encourages visitors to carry an adequate drinking water supply on hiking trails via the *Yosemite Guide*, visitor centers, and wilderness information and permitting stations.

149. Public Concern: The National Park Service should re-establish day camp facilities for children in Yosemite Valley.

“When my brother and I were kids, we were sent to the Curry Kids Day Camp so mom and dad could take the day off from us and hike to the top of Yosemite Falls. We kids had a ball, and so did they. This type of facility should be reinstated to allow parents to have time to themselves for enjoyment of the quiet scenery without being distracted by their noisy kids. Interpretative nature activities could be tailored to kids who would enjoy it more than riding a shuttle or tour bus with mom and dad. The Upper River Campground might be a good location for this facility. This is a must.” (Individual, American Canyon, CA - #907)

Response: Specific day camp facilities were not identified in the 1992 *Concession Services Plan* and are not identified in the *Final Yosemite Valley Plan/SEIS* because of the priority uses already in place for

buildable space. However, the concept is one that is supported and is provided by the Yosemite Institute. They would continue to operate youth-oriented residential field science programs. In addition, while beyond the scope of this planning effort, the concessioner may offer specific educational and recreational opportunities for children.

321. Public Concern: The National Park Service should install food storage boxes along backcountry trails.

“I strongly believe all of the more heavily used trails should have more food storage boxes to protect food from bears. Bears are not natural in the high country and are only there because of backpacker’s food. The argument that these boxes are not ‘natural’ does not impress me. They can be placed out of sight of the trail, and thus seen only by backpackers. Small inconspicuous trail signs can point to their location.” (Individual, Carmichael, CA - #1793)

Response: This concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan*. Changes in bear management practices in wilderness areas could be considered during a future revision to the park’s *Wilderness Management Plan*.

255. Public Concern: The National Park Service should build a wilderness permit kiosk in Yosemite Valley.

“I would like to see a kiosk for the wilderness permits in the Valley similar to what they have at Tuolumne Meadows where they have the wilderness permits available in the parking lot.” (Public Hearing, Merced, CA - #20106)

“I’d like to suggest that easily accessible kiosks for wilderness permits be available with extended hours. That would be helpful to coordinate with late arrivals into the Park so that backpackers could get an early start the next morning.” (Public Hearing, Fresno, CA - #20488)

Response: The Preferred Alternative of the *Final Yosemite Valley Plan/SEIS* proposes that wilderness permits would be available at the Yosemite Valley Visitor Center and at the Yosemite Village Parking/Transit Center. The permits would also be available at the proposed visitor centers near park entrances.

381. Public Concern: The *Yosemite Valley Plan* should provide for additional benches at popular sites in Yosemite Valley.

“We also have comments on the conditions of Yosemite Valley for people staying more than one day in the valley. It was very obvious that anyone with any type of physical limitation, not necessarily officially labeled handicapped, has limited access to almost everywhere. There is virtually no seating, i.e., benches, at any of the most favorite spots like Yosemite Falls, Happy Isles, along the Merced or meadows, or on the walk bridges. For us the lack of seating was disappointing. There were many places we would liked to have stopped and stayed awhile, not necessarily to rest but to take in the beauty. Unfortunately, we either had to sit on the ground or find boulders to sit on or to lean against. Anyone above the age of 60 and/or with physical limitations might not be able to do either. . . We would also like to recommend that wood benches be installed in various locations, such as on the walk bridges, at various spots along the meadows, in the area of Yosemite Falls (in the area between the parking lot and the trail up to the lower falls). We saw the perfect type of benches in downtown San Jose. They were circular benches around large tree trunks. The wood appeared to have been treated to prevent rot. There is no shortage of trees where benches could be placed. The trees would provide shade; the benches would be low maintenance; they would blend in with nature; and people would have the opportunity to stop not only to rest but to take in Yosemite’s beauty without ruining the landscape that the Sierra Club and others are so worried about.” (Individual, Irvine, CA - #4288)

Response: The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* proposes seating along trails, at shuttle bus stops, and specifically along the trails at Lower Yosemite Fall (see Vol. IA, Chapter 2, Alternatives, Visitor Experience—Recreation—Trail Use).



443. Public Concern: The National Park Service should retain the seasonal post office at Curry Village.

“Why not leave the seasonal Post Office at Curry? Will there be mailboxes in the Valley absent a Post Office?”
(Individual, Walnut Creek, CA - #3674)

Response: The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* would remove the seasonal post office from Curry Village. The post office boxes are predominately used by park employees and would be relocated to new permanent housing. The main post office in Yosemite Village would remain to meet the needs of visitors and residents.

4.12.4.c ~ Health and Safety

The health and safety of visitors enjoying Yosemite Valley is an area of concern for several people. One person recommends establishing an emergency response plan for the Valley arguing that, in the event of a disaster, limited resources may be stretched to the maximum, and the existing transportation system may not be able to handle a large volume of visitors. For these reasons, a contingency plan should be developed to address potential problems such as communications, evacuation, sheltering, supplies, and medical response. Addressing a different safety concern, another respondent points out that the firehouse must be moved out of the rockfall zone.

Other respondents voice concerns regarding the enforcement of established visitor use regulations in Yosemite Valley related to pets, parking, smoking, and littering. Of the enforcement topics people mention, domestic animal controls are most frequently addressed. These people contend that horses and household pets interfere with other people, wildlife, and native plants.

171. Public Concern: The National Park Service should establish an emergency response plan for Yosemite Valley.

“Yosemite has extremely limited medical personnel, facilities and emergency personnel and resources. Local community facilities require lengthy travel time and a mode of fast transportation for life-threatening incidents. In the event of a large-scale disaster, all available resources will be stretched to their maximum capability, and back-up personnel and equipment will require time to assemble and commute to the scene. Due diligence and common sense dictate that unique issues should be anticipated and planned for in a disaster plan written specifically for a particular area. Contingency plans should exist to address potential problems commonly related to disasters (i.e., internal and inter-agency communications, evacuation, sheltering, supplies, medical response, etc.). To complicate matters, the Valley Plan proposes an unproven public transportation system. A specific Disaster Plan must exist to cope with the high volume of visitors who will be stranded throughout the Valley due to a lack of available buses to transport them to safety.” (Individual, Malibu, CA - #1164)

Response: This concern is acknowledged; however it is outside the scope of the *Yosemite Valley Plan*. The National Park Service follows the nationally recognized protocol for the Incident Command System to address emergencies and disasters in Yosemite National Park and the El Portal Administrative Site. In addition, the National Park Service operates a full-time program for emergency responses to such events as searches and rescues, emergency medical needs, fire fighting, hazardous material spills, rockfalls, floods, and law enforcement situations.

262. Public Concern: The National Park Service should consider moving the Yosemite Valley Firehouse out of the rock fall zone.

“There are significant points brought up in most all the alternatives which are crucial for the Valley’s survival. The first is the removal of the firehouse from the rock fall zone. As an emergency service, it’s obvious why the firehouse should be moved out of a potential disaster area.” (Individual, No Address - #1520)

Response: The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* has been modified from the *Draft Yosemite Valley Plan/SEIS* in regard to the location of the firehouse. In the Preferred Alternative, the National Park Service and concessioner structural fire operations would be consolidated. Two new fire stations would be constructed, one in the Yosemite Village area (out of the historic district) and one in the Curry Village area.

744. Public Concern: The National Park Service should enforce the established visitor use regulations in Yosemite Valley.

“Enforce regulations that are already in place, especially traffic and parking laws, pet rules, and smoking rules. As a Park resident, I would like to be able to tell visitors truthfully that the rangers will fine them for taking their dogs on the trails, letting dogs off leashes or stopping their cars in traffic lanes and no-parking zones.” (Individual, No Address - #5879)

“We have conservation corps to help maintain these areas and I believe there should be strict enforcement of non litter laws. I’m tired of the way people throw soda cans, beer cans, papers, [and] plastic bags because they are too lazy to pick up after themselves. Don’t let them come back if they leave a mess. Check their campsites before they leave and put dumpsters at the entrance and exit. As they come in ask them to dispose of garbage in the car and tell them they are to save all garbage and dump when they leave!” (Individual, No Address - #7202)

Response: This concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan*. However, the National Park Service does enforce regulations set forth in the code of Federal Regulations.

100. Public Concern: The *Yosemite Valley Plan* should establish controls for domestic animals in Yosemite Valley.

“Even the sacred horse is a problem. First of all, it is an introduced species, not a native animal. Its hooves tear up the ground wherever it goes. It is allowed to leave its excrement wherever it is deposited, which is a nuisance to others and can be a pollution source. It can introduce weed seeds from other areas, and its food needs are a problem in natural areas. Domestic animals, including horses and household pets interfere with other people, wild animals, or native plants, and they need to be controlled.” (Individual, Wooster, OH - #314)

ENFORCEMENT OF DOG POLICIES

“When I first came to Yosemite dogs were discouraged in the park. They had to stay in kennels, not great. Now--you have relaxed the policy so that dogs can be in any campground, not even one specifically designated for dogs, bad idea. Consequently, I never saw so many dogs as I saw this April, everywhere. Dogs are not allowed on trails on the Valley floor, what a joke. I personally saw a dog on the trail to Nevada and a dog on the Yosemite Falls trail. It is sort of like the rule that no bikes are to ride on non-paved trails. Without enforcement, forget it. My feeling is that you have insufficient personnel now to enforce these rules. You just don’t have the manpower to make people responsible for their dogs, which don’t belong in a National Park anyway, disturbing people and flora and fauna.” (Individual, Saratoga, CA - #331)

Response: Under the Preferred Alternative in the *Final Yosemite Valley Plan/SEIS*, all concession and National Park Service stable operations would be removed from Yosemite Valley. Limited corral facilities for private stock would be provided in the Valley but would be located where effects on resources would be minimized. The elimination of commercial rides in Yosemite Valley would help alleviate many of the adverse effects of stock use. Concession and National Park Service stables to



provide stock for operations (e.g., High Sierra Camps supply and trail crew support, respectively) would be moved to Foresta. The National Park Service recognizes that, in this location, impacts associated with non-native plant and animal species could occur. Mitigation measures described in the *Final Yosemite Valley Plan/SEIS*, such as cowbird trapping and the use of processed feeds to reduce both food sources for cowbirds and the introduction of non-native plant species, could minimize adverse effects.

As the *Final Yosemite Valley Plan/SEIS* is implemented, the National Park Service would monitor the effects of the removal of stables on park resources and on the visitor experience. Such information would enable the National Park Service to make adjustments aimed at providing maximum benefits to both concerns.

The presence of dogs and other domestic pets in Yosemite Valley would be reduced by the reduction of parking in the Valley. During times of peak visitation, a majority of day visitors would be entering Yosemite Valley via shuttle buses, and pets would not be allowed on the buses, because of their potential to adversely effect the experience of other visitors. The issue of enforcement of existing regulations regarding pets (e.g., leash law and restriction of pets to paved trails on the Valley floor) is an operational concern that is outside the scope of this planning effort.

4.12.4.d ~ Concession Services

The adequacy of and need for private concession services in Yosemite National Park is a concern for many people who offer management suggestions for various concessions. One person writes that “People go to Yosemite and other parks to get back to nature and away from all those big stores and commercial shops,” and for this reason the National Park Service should limit commercial facilities in Yosemite Valley. Another person alleges that concessions overcharge park visitors while paying a “paltry fee to do business in the park,” and recommends eliminating all concession services from Yosemite Valley.

Conference services, some respondents argue, are incompatible with the Yosemite Valley environment and should be eliminated. “We are most distressed that in all of your plans, no mention is made of the impact of conventions,” one person writes. “A huge number of people are brought in to the park for a short period of time for purposes completely foreign to the goals of the park.”

Several respondents comment on food and beverage services in Yosemite Valley. In particular, the relocation of the grocery store to Curry Village generates opposing views. While one person advocates the relocation of the grocery store to Curry Village, others believe it should be retained because Curry Village is inaccessible during the winter. Also contesting the Curry Village location, one person argues that this area is not readily accessible to campers and should not be the site for a grocery store. Several respondents offer suggestions to improve the restaurant facilities: provide moderately priced fare, establish a fast food restaurant, and provide a permanent snack bar at Happy Isles. The National Park Service should also prohibit the sale of alcoholic beverages in the Valley, one person claims.

People express strong opinions about proposals to remove the medical and dental facilities from Yosemite Valley. Most fear that removing the Valley medical clinic will delay response time. A former director of the Valley medical clinic writes that retaining the medical facilities in the Valley will help decrease ground and air traffic in a medical emergency. This person believes that “Given the reality of limited helicopter evacuation ability, especially during nonsummer months, eliminating medical services in the Valley will probably cost several lives a year and significant morbidity from delay in treatment.” Constructing a new, full-service medical center

outside of the talus zone but within the Valley, another respondent contends, will eliminate the need to transport every serious injury or illness victim 45 minutes to the hospital. One individual insists that the park service does not possess the expertise to render a competent decision and should consult with experts prior to removing the clinic from the Valley.

Vehicle servicing facilities, many believe, are necessary in the Valley to ensure that visitors, National Park Service employees, and concession staff have access to fuel and automobile maintenance services. An automobile service facility should be established at a location outside of Yosemite Village to avoid crowding and vehicle exhaust, one person suggests. Another questions removing the service station from the location near Camp 6.

Other recommendations for improving concession services in Yosemite Valley include prohibiting construction of a gym in the Valley and reintroducing the Firefall.

69. Public Concern: The *Yosemite Valley Plan* should limit commercial facilities in Yosemite Valley.

“Take down all those fast food places, the big grocery store and rebuild the old village log cabin stores across from the church. Camp Curry is getting to be too commercial and we don’t need a big grocery store by the Indian Village and Museum. People go to Yosemite and other Parks to get back to nature and away from all those big stores and commercial shops. If you need more food, drive to Modesto. Have the dairy/bakery truck drive through in the morning and a deli, meat market, vegetable and misc. small shop in the old village is enough if you run out of a few things.” (Individual, Antelope, CA - #143)

Response: The *Yosemite Valley Plan* would limit commercial development in Yosemite Valley by amending the 1980 *General Management Plan* as amended by the 1992 *Concession Services Plan*, both of which impose limits on commercial development. Commercial development would be limited to those services needed to meet the basic needs of park visitors and which contribute to their experience. Services would be provided at locations that would minimize unnecessary travel and be in existing developed areas that are areas of concentrated visitor activity. However, suggestions for operational changes, such as mobile grocery delivery systems, are beyond the scope of the *Yosemite Valley Plan* but could be considered for potential implementation.

108. Public Concern: The *Yosemite Valley Plan* should require the removal of all private concessions from Yosemite Valley.

“My suggestion would be to eliminate (remove) all private concessions within the Valley. These concessionaires feed on the public like buzzards after road-kill, using Yosemite in general as a backdrop to rip off not only the people visiting Yosemite, but the public in general by paying the Park Service a paltry fee to do business within a national park.” (Individual, Townsend, MT - #349)

Response: Congressional policies state that the development of public accommodations, facilities, and services in Yosemite National Park shall be limited to those that are necessary and appropriate for public use and enjoyment of the park and are consistent to the highest practicable degree with the preservation and conservation of park resources and values. It is also the direction of Congress that necessary and appropriate accommodations, facilities, and services shall be provided by private business through concession contracts. Concessioners exist in Yosemite National Park because the National Park Service determines that services are needed to enhance the visitor experiences. Those accommodations, facilities, and services that are necessary and appropriate for public use and enjoyment of Yosemite National Park have been established by public process through the 1980 *General Management Plan* as amended by the 1992 *Concession Services Plan*, and now the *Final Yosemite Valley Plan/SEIS*. The National Park Service contracts with concessioners to provide the accommodations, facilities, and services within Yosemite National Park. The National Park Service controls the concession contracts and the nature of the services



provided by the terms of the contracts. Concessioners will continue to play an important role in providing necessary and appropriate services to park visitors. The *Final Yosemite Valley Plan/SEIS* further defines the role of concessioners within Yosemite National Park in the future.

18. Public Concern: The *Yosemite Valley Plan* should prohibit conference services in Yosemite Valley.

“I have just attended a 3-day conference at G. Lodge, leaving me with a bad feeling. This is a drain on expensive resources and we were not fundamentally here to enjoy the park. I would suggest eliminating conference/meeting services.” (Individual, Athens, OH - #37)

“We are most distressed that in all of your plans, no mention is made of the impact of conventions. A huge number of people are brought in to the park for a short period of time for purposes completely foreign to the goals of the park. We once counted 300 single occupancy cars leaving the valley after an A.A. convention. We see no reason why conventions should be held in national parks at any time.” (Individual, Sacramento, CA - #1318)

Response: This concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan*. The 1992 *Concession Services Plan* addresses the issue of conference-type activities in Yosemite National Park. Conferences, seminars, group meetings, and similar activities are governed by National Park Service concession management guidelines and park policies and procedures.

526. Public Concern: The *Yosemite Valley Plan* should require the relocation of the Yosemite Village grocery store to Curry Village.

“We strongly support this course of action, and we additionally advocate moving the Yosemite Village grocery store to Curry Village (leaving only one grocery store in the Valley).” (Conservation Organization, San Francisco, CA - #4594)

Response: The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* provides for the relocation of the main grocery store to Curry Village. A smaller grocery and deli function would be retained in Yosemite Village to reduce the amount of travel around the Valley.
(Also see response to concern # 150.)

747. Public Concern: The National Park Service should not relocate the grocery store to Curry Village.

“No to the Valley Plan relocating the grocery store to Curry Village, a site that is usually closed in the winter and where no day-use parking is proposed!” (Individual, No Address - #5435)

“Village Store - Leave at present location; however, take the modernized approach with an expanded take out food and deli section.” (Individual, Walnut Creek, CA - #3386)

Response: Selecting the proper site for a grocery store in Yosemite Valley has been a dilemma for decades. Based on public involvement, the 1980 *General Management Plan* provided for a central grocery store to be relocated to Curry Village. That decision was reconsidered in the 1992 *Concession Services Plan*, and retained the existing Yosemite Village Store instead of constructing a grocery store at Curry Village. Under the Preferred Alternative in the *Final Yosemite Valley Plan/SEIS*, a smaller grocery store with deli would be retained near the transit center and day-visitor parking to provide for the needs of day visitors and employees residing in the area. A larger grocery function would be provided at Curry Village, where the needs of campers, lodging guests, day visitors, and resident employees could be met. This split in grocery functions exists today, but the relative facility sizes would be reversed and the overall facility size would be decreased. The continuation of grocery services at both locations would minimize the amount of travel and traffic needed for visitors and employees to meet their basic needs.

150. Public Concern: The National Park Service should establish an accessible grocery store for campers in Yosemite Valley.

“The idea of establishing a grocery store primarily for campers is a great idea and goes a long way in reducing the distance campers have to travel to get groceries. Unfortunately the proposed new location, Curry Village, is not a good idea, because there are no campers at Curry Village. As almost all the campgrounds will be the same general region, it makes sense to have the grocery store centrally located in the same region.” (Individual, American Canyon, CA - #907)

Response: The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* calls for an enlarged grocery store at Curry Village, which is located near the entrance to the campgrounds in the east end of Yosemite Valley. The grocery store would serve Curry Village guests as well as Valley campers and those embarking from the Valley on backpacking trips. Shuttle bus service to the Curry Village area would make it accessible to campers. A smaller grocery operation would be located in the Degnan’s Deli in Yosemite Village. The grocery stores would be located in areas previously impacted by similar development and consistent with the zoning prescribed by the *Merced River Plan/FEIS*.

15. Public Concern: The *Yosemite Valley Plan* should encourage the development of moderately priced food services in Yosemite National Park.

“I’d love to see more healthy, moderate priced places to eat. We miss the homemade soup.” (Individual, Fullerton, CA - #39)

Response: This concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan*. The 1992 *Concession Services Plan* provides for a range of food service opportunities at multiple locations in the park. Several of the changes in food service in the last few years were intended to provide moderately priced menus. The National Park Service would continue to review concessioner menus with the intent of providing healthy food choices at moderate prices.

401. Public Concern: The *Yosemite Valley Plan* should require the development of fast food restaurant service in Yosemite Valley.

“Provide fast-food restaurant service, which will accommodate the financial needs of low-income visitors.” (Conservation Organization, Camarillo, CA - #2627)

Response: The 1992 *Concession Services Plan* provides for a range of food service opportunities at multiple locations in Yosemite National Park. A number of the changes in food service outlined in the *Concessions Services Plan* are intended to be reasonably priced fast food options. The *Yosemite Valley Plan* would implement those aspects of the *Concession Services Plan*. The National Park Service would continue to review concessions menus with an eye to providing healthy food choices that are moderately priced.

423. Public Concern: The *Yosemite Valley Plan* should provide for a permanent snack stand at Happy Isles

“Construct a small permanent snack stand immediately south of the existing restroom facility [at Happy Isles].” (Individual, Lafayette, CA - #4499)

Response: The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* does not call for a permanent snack stand at Happy Isles. Rather, it calls for an enlarged grocery store at Curry Village, which is located near the entrance to the campgrounds in the east end of Yosemite Valley. The grocery store would serve Curry Village guests as well as Valley campers and those embarking from the Valley on backpacking trips. The proximity of this and other food service facilities to Happy Isles would make a



snack stand unnecessary at that location. It would also contribute to crowding at this popular visitor destination and trailhead.

107. Public Concern: The *Yosemite Valley Plan* should prohibit the sale of alcoholic beverages in Yosemite Valley.

“The commercial services seem to be adequate. As for the gift shops and store, the only objection is the bars and the sale of alcoholic beverages. If anyone wants booze they bring it along, but I have also seen more than one drunk in the Valley. This we can do without, as it doesn’t have any place in a national park.” (Individual, San Francisco, CA - #312)

Response: This concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan*. The 1992 *Concession Services Plan* has designated locations in the park where alcoholic beverages may be sold. The personal use of alcohol is up to the discretion of each person of legal drinking age.

89. Public Concern: The *Yosemite Valley Plan* should retain medical and dental facilities in Yosemite Valley.

“Do not move the medical and dental facilities. All the other options keep them in their current locations. Alternative #2 should also. People with sick and injured children or are sick or injured themselves while in the Valley do not want to travel to El Portal for medical assistance. Helicopter landings for emergencies is easier in the Valley.” (Individual, Pacific Grove, CA - #156)

“I cannot understand the elimination of the Valley Medical Clinic. Without this, any accident involving a dozen people in the Valley would seem a disaster.” (Individual, Del Mar, CA - #64)

“I have given a lot of thought as a former physician, medical director of the clinic and EMS medical director for the park. This regards the preferred alternative of eliminating the clinic. I think it’s a poor idea and reflects inadequate impact assessment. Given what is possible (rather than recent performance of the current concessionaire who has vested interests in increasing transports out of the park) the clinic has potential for a great deal of positive impact by decreasing ground and helicopter traffic out of the park. A paramedic based triage system with a remote base station medical supervisor cannot hope to do the same. The nature of such a system is to err on the side of caution given the very limited information received by the medical supervisor. Many moderate severity problems can be stabilized and even definitively treated in the park without impacting as negatively on the environment. Given the reality of limited helicopter evacuation ability, especially during non-summer months, eliminating medical services in the Valley will probably cost several lives a year and significant morbidity from delay in treatment. I know this from personal experience, even given the limited service we were able to provide. Paramedics can’t replace this function entirely. The environmental impact of having a clinic and housing for essential personnel (such as a few resident doctors and nurses) would be less than the impact of the increased, ultimately unnecessary transports. Getting rid of the current concessionaire and scaling down services to the unprofitability of providing services in the park (such as was done formally and is being done at Grand Canyon), is the most sensible and least impacting way of meeting the needs of the visitors and staff.” (Individual, CA - #6763)

CONSTRUCT NEW FACILITY OUTSIDE OF THE TALUS ZONE

“The National Park Service has identified the medical center in Yosemite Valley as an ‘Essential Facility’ - at the same time it is located within the Talus Zone of Yosemite Village. The Yosemite Valley Geologic Hazards Guidelines are quite clear in specifying that all structures that fall within the ‘Essential’ or ‘Hazardous’ categories be removed if they are within the Talus or Rock Fall Shadow Zones. The Preferred Plan calls for the complete removal of the existing medical center. A new firehouse is to be built to handle emergency medical services as well as the fire fighting needs of the Valley. The Chamber is concerned that this will prove inadequate for the needs of the Yosemite Valley. The medical center currently treats an average of 60 patients a day in the summer months. The other three plans keep the medical center where it is within the Talus Zone but also call for the new emergency treatment center with the firehouse. We suggest that a new medical center be considered within (or just outside) the Yosemite Valley designed to handle the 18,000 visitors a day that Yosemite averages during summer months. By

keeping a complete medical center within the Valley (or just outside), the need to medivac patients to hospitals 45 minutes away for every serious injury or illness would be eliminated.” (Business, Fresno, CA - #7458)

Response: Due to responses to public comments received to the *Draft Yosemite Valley Plan/SEIS* during the public review period, the Preferred Alternative has been modified to retain the medical clinic at its current location in the Valley. However, the dental clinic function would still be removed from the Valley, as originally indicated in the Preferred Alternative in the *Draft Yosemite Valley Plan/SEIS*.

664. Public Concern: The National Park Service should consult with independent experts before removing the medical clinic from Yosemite Valley.

“The proposed removal of the Clinic from Yosemite Valley is a very significant step for the National Park Service to suggest. If implemented, I believe the adverse consequences for visitors, residents and employees would be significant, and in some cases, life-threatening. In this regard, I am concerned about the factual basis upon which this aspect of the ‘preferred alternative’ has been made. I do not believe that planners within the National Park Service possess the specialized knowledge of medical services planning, management (including financing) and delivery to render a competent decision on this critical topic. I recommend that no further action to remove the Clinic be made until subject-matter experts outside the Department of the Interior are consulted to assist the Service in developing a comprehensive plan for providing the necessary range of emergency and non-emergency medical care service that will be essential to visitors, residents and Park employees. This subject appears to be treated in a very superficial manner in the Plan, with little in-depth discussion of the mechanics of any future medical system that remains to be developed. Please seek a neutral, independent analysis by subject-matter experts before proceeding further to reduce or eliminate medical services (beyond ambulance capability) in Yosemite Valley.” (Individual, Yosemite National Park, CA - #7020)

Response: In response to public comment received to the *Draft Yosemite Valley Plan/SEIS*, the Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* has been revised to keep the medical clinic in its current location in Yosemite Valley.

Note: One response is provided to concerns #99, #153, and #279, and is placed following concern #279.

99. Public Concern: The *Yosemite Valley Plan* should retain vehicle service facilities in Yosemite Valley.

“Emergency automotive repair service is an important service in Yosemite Valley that should be retained. El Portal is too far distant to provide this.” (Individual, Los Angeles, CA - #470)

“The gas station went out a few years back and that again seems like a poor move as the visitors must make certain they have gas before heading to the Valley. That too is taking away ease of travel in the park.” (Individual, Long Beach, CA - #482)

“For the company concessions to maintain their bus fleet there should be a garage in Yosemite Valley. Can the old NPS garage be used for this purpose? How will the Park Service maintain their trucks, patrol cars and now plows in Yosemite Valley?” (Individual, American Canyon, CA - #907)

Response: See response following concern #279 below.

153. Public Concern: The National Park Service should establish a gas station outside the Yosemite Village area.

“There is one alternative for the placement of a new gas station in the Village. The need for a public commercial gas station is obvious. Its use would be continuous and heavy. To set its location adjacent to an existing concentration of tourists would complicate the entire area. Its location should be in an isolated area on the outbound valley exit road,



perhaps in the west valley. At least this potential location would reduce the exhaust from the tankers who supply the fuel.” (Individual, American Canyon, CA - #907)

Response: See response following concern #279 below.

279. Public Concern: The National Park Service should explain why the gas station was removed from Yosemite Valley.

“Why was the gas station removed from the Valley there near Camp 6, other than everyone saying that the tanks were leaking, but how come they’re not leaking at Wawona or Big Oak Flat Road?” (Individual, Alameda, CA - #20019)

Response: Gasoline is available along all park entrance roads within a reasonable distance of Yosemite Valley. It is not necessary to duplicate this service in the Valley. In the *Final Yosemite Valley Plan/SEIS* Preferred Alternative, a vehicle fueling facility is proposed for Yosemite Village to support park operations and shuttle bus fueling. The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* would limit day-visitor parking. In addition, private vehicles would also be allowed to travel to overnight lodging facilities, where they would mostly remain until guests departed the Valley. Therefore, a vehicle service facility in the Valley would not be necessary. The removal and relocation of these facilities to El Portal would meet public needs.

(This response also applies to concerns #99 and #153.)

249. Public Concern: The *Yosemite Valley Plan* should prohibit the construction of a gym in Yosemite National Park.

“Don’t add a gym. Yosemite is for getting back to nature. If people don’t like it then they should go somewhere else for vacation.” (Individual, No Address - #3066)

Response: No public gym is proposed in any of the alternatives in the *Final Yosemite Valley Plan/SEIS*. However, there is a Valley employee/residential wellness facility co-located within employee housing included as part of the Preferred Alternative.

703. Public Concern: The National Park Service should reintroduce the Firefall for Yosemite Valley visitors.

“If you want to make it better, bring back the Firefall.” (Individual, Fremont, CA - #6273)

Response: This concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan*. It is unlikely that the firefall will ever again be offered as an attraction because of the damage that was done to park resources. The damage included forest impacts from the collection of massive amounts of red fir bark, heat damage to rock lichen, discoloration of the rock face, and meadow damage from trampling and parking by onlookers. Such synthetic attractions are no longer considered appropriate to the park or to the mission of the National Park Service. However, their memory may be important as part of what was done historically to promote a park experience, gain support of national parks, and as an example of past practices that have changed because their impacts are better understood.

Section 4.13 ~ Transportation

Next to visitor experience, transportation is one of the most fiercely debated and frequently commented on subjects of the *Draft Yosemite Valley Plan/SEIS*. Indeed, for many Yosemite National Park visitors, transportation is inherently wedded to their experience of the park. In other words, for these individuals, true enjoyment of the park entails entering and moving about the park in certain ways. Public concerns in the following subsections are organized according to the primary management action requested by respondents. These subsections include general management direction, roads, trails, bridges, parking, traffic management, vehicle management, employee transportation, alternative transportation and fuels, public transportation, and regional transportation.

4.13.1 ~ General Management Direction

This section includes analysis of public comments that either address the general need for further transportation-related analysis within the *Final Yosemite Valley Plan/SEIS*, or request management strategies of the National Park Service that cross subject areas covered in Sections 4.14.2–4.14.11 to follow. To begin with, respondents request that the final plan include four types of analyses, or data: (1) an analysis of cumulative environmental impacts (to air and water quality, endangered species, and visitor experience) associated with implementing transportation system proposals in Yosemite National Park; (2) a cost-benefit analysis of operating buses versus varying the number of parking spaces in Yosemite Valley; (3) a definition and justification for the economic, air quality, and transportation benefits of limiting the number of private vehicles while increasing the number of diesel buses in Yosemite Valley; and (4) data supporting the judgment that transportation system proposals will, indeed, enhance visitor experience in Yosemite National Park.

Other respondents advocate an array of general transportation strategies, goals, and management directions. While many people believe that the National Park Service should reduce congestion in Yosemite Valley, the means they suggest to reach this goal differ widely. For instance, one person requests that the National Park Service consider congestion-reducing measures that are less costly than those currently proposed, especially given the vagaries of economics and future administrations. And even if changes are needed in the Yosemite Valley transportation system, such plans need to be tailored to the seasonal ebb and flow of park visitation, according to another respondent (see Section 4.14.7 ~ Vehicle Management, for additional public concerns on seasonality). Whatever else the *Yosemite Valley Plan* may accomplish, one U.S. Representative advocates plans that reduce visitor travel time in accessing Yosemite Valley. This will ultimately improve visitor experience, according to this person. Still others request that there be no changes to Yosemite Valley's road and trail infrastructure.

183. Public Concern: The *Yosemite Valley Plan* should address the cumulative environmental impacts of implementing transportation system proposals in Yosemite National Park.

“What are the cumulative environmental impacts [of transportation system proposals in the Park] to air quality, water quality, vegetation, wildlife, endangered species, and the visitor experience?” (Individual, Malibu, CA - #1164)



Response: The cumulative impacts of actions proposed in the Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* and other related actions are described in Vol. IB, Chapter 4, Environmental Consequences, Transportation. A list and description of other ongoing and reasonably foreseeable future projects considered in the cumulative impact analysis is presented in Appendix H. This list includes other transportation-related projects in the park.

348. Public Concern: The *Yosemite Valley Plan* should include a cost-benefit analysis of operating buses versus varying the number of parking spaces in Yosemite Valley.

“As I understand it, your preferred alternative consists of a one-time expenditure of \$343 million dollars in capital and planning efforts, roughly \$5.45 million in annual operating cost increases, and \$11 million annually for operation of an internal transit system. This level of funding assumes 550 parking spaces in the Valley to accommodate all required day use parking during low visitation days, or at mid-winter levels. As I read the plan, we may increase the level of parking in the east end of the Valley to somewhat less than 900 spaces and reduce the annual operations of the shuttle system to approximately \$5 million without significantly affecting other elements of the plan. Can your staff provide each level of service (number of parking spaces) on a cost/benefit chart so that we may identify where the point of diminishing returns for the cost of parking as compared to the cost of busing? The analysis should reflect from 550 to at least 1800 day-use parking spaces, as well as the shuttle costs required at each increment of parking facilities.” (U.S. Representative, Fresno, CA - #2951)

Response: Although it would be possible to perform cost-benefit analysis specific to parking and internal transit system operations, one has not been performed as it would be of little benefit as a tool to compare individual alternatives. Additionally, many values recognized by the public and National Park Service do not have easily identifiable economic costs and benefits (e.g., soils, vegetation, wetlands, archaeological sites and historic structures, among others). Parking and internal transit system operations are but two of many actions that have been combined to formulate each of the action alternatives evaluated and analyzed in the *Final Yosemite Valley Plan/SEIS*. The *Final Yosemite Valley Plan/SEIS* does present the total estimated costs for capital and operating costs for each of the action alternatives in Vol. IA, Chapter 2, Alternatives. Understanding the total costs of implementing each of the action alternatives in a holistic manner is important, as it provides the best opportunity to compare the overall costs between each of the alternatives.

However, overall costs are but one of many comparisons between each alternative used to help identify the alternative that would be most successful at accomplishing the purpose and need for the *Yosemite Valley Plan*: to restore, protect, and enhance natural and cultural resources, including the Merced River’s Outstanding Remarkable Values; reduce automobile congestion; provide opportunities for enhanced, high-quality resource-based visitor experience; and provide effective park operations.

421. Public Concern: The *Yosemite Valley Plan* should define and justify the economic, air quality, and transportation benefits of limiting the number of private vehicles while increasing the number of diesel buses in Yosemite Valley.

“The YVP fails to clearly define and justify the economic, air quality or transportation benefit of reducing traffic congestion and parking in the Valley by limiting the number of privately owned vehicles entering Yosemite while increasing diesel-powered buses. The YVP is designed to provide direction and propose specific actions toward preserving Yosemite’s natural, cultural and scenic resources. Alternative 1 of the YVP is based upon a continuation of current conditions. Alternative 2, the Preferred Alternative, endorsed by the NPS and Alternatives 3, 4, and 5 emphasize diesel-powered bus transportation as the primary mode of visitor circulation in Yosemite. Aside from Alternative 1, the proposed alternatives include the construction of additional infrastructure such as a bus terminal, additional roadway and bridge modifications, and vehicle check points in order to support mass transit. However, these types of ‘improvements,’ which will create greater Vehicle Miles Traveled (VMT) and do not utilize the best technology available, are contradictory with Federal, State and regional air quality conformity practices.” (Tuolumne County Board of Supervisors, Sonora, CA - #4436)

Response: The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* does not propose limits on the number of privately-owned vehicles entering Yosemite National Park. The Preferred Alternative includes implementation of a traveler information and traffic management system that would assure that the number of vehicles east of El Capitan crossover would not exceed the supply of parking. The Preferred Alternative also provides parking for day visitors at locations on each approach route to the Valley. Shuttle buses using the best available, cost-effective technology for fuel and propulsion would transport visitors from out-of-Valley parking facilities to the Valley only when the parking in the Valley was not sufficient. Other shuttle buses, also using the best available, cost-effective technology would transport visitors within the Valley in a manner similar to the existing Valley shuttle system.

The economic, air quality, visitor experience, and other consequences of the Preferred Alternative and the other alternatives are documented in Vol. IB, Chapter 4, Environmental Consequences, of the *Final Yosemite Valley Plan/SEIS*. The analysis documented in Chapter 4 shows that vehicle miles traveled, pollutant emissions, and energy consumption would be reduced under the Preferred Alternative from the levels experienced under the No Action Alternative. Emissions from shuttle buses are included in the analysis. Several types of shuttle bus fuel and propulsion systems were analyzed and documented in Chapter 4.

182. Public Concern: The *Yosemite Valley Plan* should cite data supporting the conclusion that transportation system proposals will enhance visitor experience in Yosemite National Park.

“Where is the data which supports the Valley Plan proposals and the conclusion that this transportation system will enhance the visitor experience in Yosemite National Park?” (Individual, Malibu, CA - #1164)

Response: In an extensive survey of park visitors in 1990 and 1991 (Grammann 1992), more than 80% of visitors supported (64% strongly supported) the concept of day-visitor parking in Yosemite Valley. The National Park Service has been considering a plan to limit the number of vehicles in Yosemite Valley and expand the shuttle system. Under the Preferred Alternative in the *Final Yosemite Valley Plan/SEIS*, only day visitors would be required to ride shuttle buses to and from Yosemite Valley. The 1991-1992 survey asked visitors, “Would you be willing to park your car outside the park, one-half hour or more away, and take a shuttle bus to and from Yosemite?” 76% of day visitors supported the concept.

The conclusion of the study was that an arrangement that reduces the perception of crowding and traffic in Yosemite Valley (i.e., park-and-ride system) should contribute to visitors’ enjoyment.

Vol. IA, Chapter 3, Affected Environment, discusses existing conditions for transportation and visitor experience in Yosemite Valley. The Preferred Alternative proposed in the *Final Yosemite Valley Plan/SEIS* sets forth actions to address transportation and visitor experience, and to achieve the goals established in the 1980 *General Management Plan*. The goals related to visitor experience in the *General Management Plan* include reclaiming priceless natural beauty, promoting visitor understanding and enjoyment, markedly reducing traffic congestion, and reducing crowding.

The Visitor Experience section of Chapter 3 reiterates that congestion, crowding, and intrusion of development into scenic resources were problems identified in the *General Management Plan*. Since then, visitation to Yosemite National Park has increased from 2.4 million visitors per year in 1980 to nearly 4 million in 1998, and the problems noted above continue today.

The estimated vehicle accumulation in the east Valley is estimated to be 4,696 vehicles on a typically busy summer day, with 1,082 resident, National Park Service, and concessioner vehicles. For a visitor parking demand of 3,614 vehicles in the east Valley, approximately 2,800 parking spaces are available in the east Valley. The shortage of about 1,000 parking spaces for visitors in the east Valley degrades the visitor experience, especially for those who are unable to find desired parking.



Vol. IB, Chapter 4, Environmental Consequences, in the *Final Yosemite Valley Plan/SEIS* documents the consequences to visitor experience of each of the action alternatives. The analysis presented in Chapter 4 shows the rationale for concluding that visitor experience would be enhanced under the Preferred Alternative.

166. Public Concern: The National Park Service should consider congestion-reducing measures in Yosemite Valley that are less costly than those currently proposed.

“Do we really need intrusive and expensive solutions to this [congestion] problem? Get out of your car once you arrive in Yosemite and you won’t see many cars. Get away from the visitor center and you won’t see many visitors. The new plan calls for hundreds of millions of dollars and will keep costing money forever because running dozens of buses costs big dollars. Can we really count on successive administrations and economies to support expensive and burdensome systems? History says, ‘don’t count on it.’” (Individual, Wawona, CA - #46)

Response: The alternatives in the *Final Yosemite Valley Plan/SEIS* propose that visitors would park their personal vehicles when they arrive in the Valley. The alternatives also recognize that the Yosemite Valley Visitor Center, by definition, is the first destination for most visitors. The alternatives present a range of solutions with varying costs for transportation. The lowest cost alternative is Alternative 3, which requires no out-of-Valley parking. The other alternatives include out-of-Valley parking because it is needed to meet the day-visitor use levels established in the *General Management Plan*.

The traffic management measures and in-Valley shuttle included in the *Final Yosemite Valley Plan/SEIS* are designed to allow visitors to find parking spaces efficiently, park their vehicles in one location, and travel throughout the Valley by a variety of means. Funding sources for the implementation of the transportation elements of the *Final Yosemite Valley Plan/SEIS* include the Flood Recovery Appropriation, anticipated Fee Demonstration funds, the Line Item construction program, and other sources, such as the Federal Lands Highway Program. Various analyses, including value analysis and cost-benefit analysis, are required by the National Park Service for most projects, with review and approval by the Director, to ensure the accomplishment of the stated mission and to optimize cost-effective design, construction, or management.

581. Public Concern: The National Park Service should reassess off-season transportation plans for Yosemite Valley.

“Our vision would say to rethink the whole transit and parking scheme for the off-season and winter season. Eliminate all in-Valley shuttles in those seasons, or at least drop the west Valley route. And leave the distributed parking (pull outs, etc.) for use during those seasons. Why? Less costly and certainly much happier visitors.” (Individual, Oakhurst, CA - #3555)

Response: Shuttles operating within Yosemite Valley would provide service year-round to sites within the Valley. Generally, the peak visitation season for Yosemite National Park occurs from mid-June through Labor Day weekend. The months of April, May, September, and October comprise the "shoulder" season, with intermediate levels of visitor use. Visitation is lowest from November through March. The operating hours of the shuttle bus routes and the frequency of service would be adjusted within each season as required to meet visitor needs while managing traffic so as not to exceed the capacity of parking and roads.

Shuttles from out-of-Valley parking sites to the Valley would not operate from November through March when parking in Yosemite Valley would be sufficient to serve day visitors. Out-of-Valley shuttle service would start in April, beginning with the weekends. As visitation increased, the amount of service would be expanded, reaching a maximum level of service on weekends in the summer. Then, in the last weeks of the season, service would be reduced in the fall as the need decreased, with shuttles to out-of-Valley parking areas operating only on weekends.

361. Public Concern: The *Yosemite Valley Plan* should reduce visitor travel time to Yosemite Valley.

“Your plan reflects that the overall average travel time to Yosemite Valley as a result of this plan would increase by 21 minutes. I cannot see how that increase will contribute positively to the visitor experience. On the contrary, efforts to reduce the time of travel to the Valley should be sought. Recent improvement such as the rebuilding of Highway 140 into the Valley, are essential elements of improving the visitor experience in this way.” (U.S. Representative, Fresno, CA - #2951)

Response: Transportation system changes in the Valley are designed to improve the visitor's experience. The *Yosemite Valley Plan* proposes to reduce vehicle traffic in the Valley to afford visitors a more nature-oriented experience that is less affected by the noise, pollution emissions, and visual presence of motorized vehicles. The improved visitor experience afforded by reducing vehicle traffic is determined to be worth the inconvenience and time associated with visitors riding a shuttle, walking, or biking to destinations in the Valley.

The Visitor Experience section of Vol. IA, Chapter 3 documents that congestion, crowding, and intrusion of development into scenic resources were problems identified in the *General Management Plan*. Visitation to Yosemite increased from 2.4 million visitors per year in 1980 to nearly 4 million in 1998. This trend and other information in Chapter 3 support the need for changes related to visitor access and transportation.

The analysis in Vol. IB, Chapter 4 shows the rationale for concluding that overall visitor experience would be enhanced under the plan. Although the visitor's travel time into the Valley would increase with the implementation of shuttle service from out-of-Valley parking areas, the overall experience once in the Valley would improve with the reduction in traffic and parking congestion and the restoration of natural areas currently being damaged by roadside parking. Also, visitors would no longer lose time circling the Valley in private vehicles searching for parking and contributing to traffic congestion.

Visitor spontaneity would be reduced in terms of deciding how to visit the Valley. Visitors may have to plan ahead to visit the Valley and be prepared to ride shuttles into the Valley. However, visitor acceptance of shuttle buses is documented in survey responses that show that more than 90% of surveyed users had a satisfactory experience. Once in the Valley, visitors would have pedestrian and bicycle paths and shuttle services available to gain access to all parts of the Valley.

599. Public Concern: The *Yosemite Valley Plan* should retain existing trails and roads in Yosemite Valley.

“Existing trails should remain and no closure of highways permitted.” (Individual, Arroyo Grande, CA - #3555)

Response: The actions proposed in the Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* aimed at reducing congestion in Yosemite Valley provide an opportunity, through reduced traffic volume, to convert some existing road segments to trails, thereby providing access to areas of the Valley without the immediate presence of motor vehicles. Two areas where this is proposed are Northside Drive from Stoneman Bridge to Yosemite Village and from Yosemite Lodge to the El Capitan crossover. The latter segment would remain available for emergency vehicle use. Existing trails would remain, though some segments may be relocated due to site design requirements or to improve access. (Also see the response to concern #1085.)

4.13.2 ~ Circulation and Roads

To the extent that roads circulate traffic, the topics of traffic circulation and roads in Yosemite Valley are inextricably linked. Nevertheless, since Valley circulation entails more than just



roads, general circulation concerns are analyzed separately (4.14.2.a) from road-specific concerns (4.14.2.b–e). Road-related comments range from the very general and programmatic to the very specific and project-level. A wide array of these concerns are addressed below under General Management Direction. However, enough public concerns address Northside Drive, Southside Drive, and the El Portal Road, they warrant treatment in their own sections of this analysis.

4.13.2.a – Yosemite Valley Circulation

A great many respondents request that Yosemite Valley’s traffic circulation remain as it has functioned in the past, or functions presently. A widespread sentiment is that “the existing ‘round-robin’ one-way traffic pattern [along Northside and Southside Drive] through the Valley” needs to remain. To do otherwise, they claim, would jeopardize safety (given two-way traffic on Southside Drive) and fail to clearly reduce traffic volume or traffic flow efficiency. Besides the need for the *Final Yosemite Valley Plan/SEIS* to address traffic circulation in Yosemite Valley, one person requests that the final plan address how such circulation proposals might impact California state highways adjoining the park—highways that arguably must remain accessible regardless of any access restrictions to Yosemite Valley.

81. Public Concern: The *Yosemite Valley Plan* should retain existing traffic circulation patterns in Yosemite Valley.

“We need to keep the existing ‘round-robin’ one-way traffic pattern through the Valley. Two-way traffic on the ‘south-side’ road was a danger in the past and would be worse now. Setting the ‘north-side’ road aside for bike/hiking ‘only’ would be giving a very small segment of park visitors a very large percentage of the Valley. I could see a trail for bike/hiking traffic adjacent to the north-side road making it safer for all. Not a bike lane attached to the existing roadway, but a separate trail meandering through the trees between the river and road.” (Individual, El Dorado, CA - #243)

“The one-way loop for private vehicles through the Valley remains the most effective means of transportation, offering spectacular scenery which can be taken in at one’s leisure for people unable to walk or bike. Two-way traffic which includes large shuttle buses together with private vehicles is a recipe for accidents, as people cast their views towards the granite domes and waterfalls and not towards oncoming traffic.” (Individual, Eugene, OR - #326)

“I find little justification in the DYVP for these [Valley circulation] proposals other than the desire to create a bicycle/hiking path free of vehicle traffic and noise along the site of the present Northside Drive. This will disrupt the present Valley traffic circulation that separates incoming and outgoing traffic and will double the volume of traffic on Southside Drive.” (Individual, Mountain View, CA - #151)

“The current road system in the Valley is a good sound system, which accomplishes two fundamental missions: (1) the mass movement of vehicles in an efficient manner and (2) doing same in a safe manner. It must be kept, totally, in place. . . The choice, based on safety, seems quite clear between a two lane, two way road and a two lane, one-way road. Safety from near elimination of head-on collisions, increased/improved car movement, reduced traffic jams, and improved air quality would dictate in favor of maintaining the current road system. Visitor safety must always be uppermost in any decision-making process.” (Individual, American Canyon, CA - #907)

SOUTHSIDE DRIVE

“It blows me away that NPS has considered making Southside Drive a two way road. On a regular basis guests can be found parking in the road looking at a map, or worse, leaving their car in the road as they wander off to take a photo of the granite walls. Imagine even half of the vehicles in Yosemite Valley, repeatedly waiting as one after another driver stops for the deer. Not to mention it is hard enough for vehicles and rented RVs on blind curves.” (Non-NPS Yosemite National Park Employee, Yosemite National Park, CA - #4827)

Response: The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* seeks to provide visitors with an experience that is less dominated by the presence of automobiles. Touring the Valley via automobile would still be possible for those with cars in the Valley, although less convenient. (See Vol. IB, Chapter 4, Environmental Consequences, Visitor Experience—Recreation for impacts to auto-touring.) Visitors desiring a more natural experience would be able to visit more areas without being affected by the sight, sound, and emissions of vehicles. Maintaining safe traffic conditions and reliable vehicle access and circulation would be providing an improved experience and the opportunity to restore natural processes.

The day-visitor parking reduction, traffic management strategies, and changes to overnight visitor capacity as proposed in the Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* would result in a decrease in traffic on Southside Drive east of El Capitan crossover, even with two-way traffic. The traffic volume on Southside Drive would be similar to or less than the volume of traffic using two-lane, two-way roads elsewhere in the park. Two-way traffic on similar two-lane roads occurs on all of the other roads in the park as on those leading into the park from gateway communities. There is no evidence that two-way traffic presents a safety hazard in a national park setting. Traffic accident rates on two-lane, two-way roads throughout the National Park System are low. A detailed engineering study of Southside Drive would be performed to identify needed improvements to ensure the safe operation of all the types of vehicles that would use the road.

Adequate turnouts would be provided to allow slower vehicles, such as Valley Tour trams, to be passed by other vehicles. Turnouts at historic views would remain for short stops. Two-way operation of Southside Drive could result in somewhat slower travel, but the benefits to visitor experience of a long stretch of the north side of the Merced River not affected by vehicle traffic outweigh the inconvenience that slower traffic could cause.

Northside Drive would not be removed. It would be closed to everyday use by motor vehicles. In the event that Southside Drive would have to be closed temporarily because of rockfall, flood, fire or other events, Northside Drive could be used for emergency access and egress.

677. Public Concern: The *Yosemite Valley Plan* should address the potential impacts of changes to Yosemite Valley traffic circulation on State Highways 120, 140, and 41.

“Additional information is needed concerning traffic circulation within and outside the Park boundaries. Please discuss the potential impacts of each alternative to State Routes 120, 140 and 41 and what is being proposed to mitigate these impacts. There should be specific discussion regarding levels of service (LOS), peak hour congestion, and queuing problems on state routes leading to the Park. State Route 120 is a designated Interregional Route even though a portion of it traverses Yosemite National Park. This state highway must be accessible and useable by interregional traffic regardless of any National Park Service policy limiting automobile access into Yosemite Valley.” (Individual, Stockton, CA - #30245)

Response: The *Yosemite Valley Plan* would potentially cause changes in travel conditions on state Highways 120, 140, and 41 as a result of changes in visitation to Yosemite Valley. The plan would not cause changes to visitation in other parts of Yosemite National Park or changes in travel through the park on state highways. The plan does not propose limits on visitation to the Valley; any changes in visitation and resulting travel conditions would be caused by changes in overnight accommodations and transportation facilities and services for day visitors in the Valley.

The *Yosemite Valley Plan* action alternatives each provide overnight accommodations in the Valley and day-visitor parking to support a total daily visitation of 18,241 people. While this level of visitation is consistent with the 1980 *General Management Plan* and approximately 5% higher than visitation on average summer days, it is about 17% less than visitation on typically busy days. Any visitation in excess



of 18,241 people per day to Yosemite Valley would be served by regional transit or by other alternative forms of transportation.

The combined effect of the potential visitation changes on daily vehicle traffic to and from Yosemite National Park on state highways would be a decrease of 10 percent on typically busy days. There may be an increase of up to 5% on the average day if visitation shifts from the busiest days to other days. Because traffic to and from Yosemite Valley represents only a portion of all traffic on state highways outside of and within the park, the impact of changes associated with the *Yosemite Valley Plan* would be negligible. The *Yosemite Valley Plan* would have no impact on the ability of visitors to travel through the park using connections among state highways.

Because the action alternatives in the *Yosemite Valley Plan* would reduce overnight accommodations in Yosemite, visitation could shift from overnight to day use. This shift could change the diurnal distribution of traffic to and from the Valley. Under none of the action alternatives would day-visitor use be greater than on typically busy days in the No Action Alternative. As a result, peak hour traffic volumes would not be expected to be any higher than on typically busy days in the action alternatives. There would be negligible impacts to traffic levels on state highways outside the park and on access routes to Yosemite Valley within the park as a result of visitation shifts from overnight to day use. Vol. IB, Chapter 4, Environmental Consequences, describes changes in travel conditions on parts of the park road system that would have significant impacts as a result of the plan.

4.13.2.b ~ General Management Direction

Public comments on the *Draft Yosemite Valley Plan/SEIS* contain a variety of general road management concerns. They range from imperatives to remove most existing roads in Yosemite Valley to geographic and geological constraints on where or where not to build roads. At least one person urges the National Park Service to move away from a road-dependent “Disneyland” management paradigm. To accomplish this, this person requests that all roads, except one Valley loop road, be eliminated from the Valley. If roads are built in Yosemite Valley in the future, they should be surfaced with nonasphalt pavement, writes another respondent. Transitioning to the use of nontoxic binders, this person asserts, will help maintain water quality of the Merced River.

Yosemite Valley talus zones, rockslide areas, and meadows are three general areas that a number of respondents address in their discussions of road management. According to one person, the classic case of why road building should not occur in talus zones is exemplified in the case of the Old Big Oak Flat Road, a road that “is plainly visible from the Wawona Tunnel View.” If, however, the reason for relocating roads out of rockslide areas is the potential for personal injury, roads should not be relocated, according to another. This person questions the National Park Service’s analysis of risk and goes on to claim that “the chances of being struck by a rock are miniscule—far less than being hit by falling debris in a city environment.”

The Preferred Alternative prescribes meadow restoration throughout Yosemite Valley, part of which entails road removal through Stoneman and Ahwahnee Meadows. As with other transportation changes, people respond both positively and negatively to this proposal. Some question the park service’s definition of “noncontributing roads,” especially in relation to roads through Ahwahnee and Stoneman Meadows. Moreover, those in favor of retaining meadow roads argue that roads should remain “so people can view and experience the meadows and vistas in the way that provides the most access to all citizens and the least trampling.” Offering a counterpoint, others urge the park service to remove roads from select meadows such as Cook’s, El Capitan, and Sentinel. Doing so, they claim, would create open space, reduce noise, and follow prescriptions laid out in the 1997 *Draft Yosemite Valley Implementation Plan*.

A miscellany of other road concerns round out this section: the need to build a new road into East Yosemite Valley campgrounds, the need to create vehicle access to Mirror Lake, and the need to limit development in the Cascades area based on the park service's alleged failure to analyze cumulative impacts of the Cascades rock-crushing facility.

634. Public Concern: The *Yosemite Valley Plan* should require the removal of all roads from Yosemite Valley with the exception of one day-use loop.

"Eliminate all roads within the Valley with the exception of one loop road, to be used in daylight hours only, that the motorized public would be allowed to use for day-use only. This not only solves the crowding problems, but gets you out of the 'Disneyland' concept that the Valley has taken on. Sure you will hear howls of protest from all corners, but so be it . . . Stand firm!" (Individual, Townsend, MT - #349)

Response: The presence of roads within Yosemite Valley provides essential visitor and management access needs consistent with the park's purpose, that of making the unimpaired resources of Yosemite available to people for their enjoyment. In the *Final Yosemite Valley Plan/SEIS*, the park proposes to remove all nonessential roads from Yosemite Valley. Priority in removing nonessential roads is given to those that run through meadows or affect other sensitive resources. Where nonessential roads are removed for purposes of resource preservation, alternative means of pedestrian access to areas will be provided.

Northside Drive is also proposed to be closed to vehicle traffic from Yosemite Lodge to El Capitan crossover in order to provide a multi-use paved trail and to offer visitors an area near the Merced River that is unaffected by traffic. The closure of this portion of Northside Drive to vehicle traffic would require Southside Drive to be converted to two-way traffic from Sentinel Bridge to El Capitan crossover.

489. Public Concern: The *Yosemite Valley Plan* should require the use of nonasphalt pavement in Yosemite Valley.

"Toxic asphalt pavement binders need not be used for pavement in Yosemite Valley because a non-petroleum alternative is available. (The toxicity of petroleum-based compounds, especially in fresh asphalt, is known but, not widely publicized. I understand that photochemical reactions of PAH's have been found to occur in alpine lakes far from roads.) Check with your aquatic biologists as they are most likely to know of research references which provide scientific support for your decisions. This is another area in which the Yosemite National Park staff representing the whole NPS can take a leadership position. The extra cost of non-asphalt pavement may well be mitigated by health of the Wild & Scenic River and its tributaries." (Individual, Merced, CA - #9329)

Response: Decisions regarding the use of nonasphalt pavement in the Valley would be part of an operational plan for Valley road improvements. The operational aspects of roadway improvements in Yosemite National Park are beyond the scope of the *Yosemite Valley Plan*.

632. Public Concern: The *Yosemite Valley Plan* should prohibit road construction in talus zones of Yosemite Valley.

"Action: Talus zone road construction in Yosemite Valley. . . Result: Switchbacks and construction in the rockslides of the Old Big Oak Flat Road is plainly visible from the Wawona Tunnel View. This type of road construction is a mistake and should not ever again be allowed in Yosemite National Park." (Individual, Los Angeles, CA - #470)

Response: During the Yosemite Valley planning process, rockfall and debris flow zones in the Valley were identified and were mapped. Based on the hazards associated with these zones, National Park Service staff have evaluated the potential uses allowable in these areas and recommended the types of facilities that are acceptable for each zone. Housing and lodging are considered higher intensity uses and therefore not allowable in rockfall or debris flow zones. Some roads and parking facilities may be allowable in rockfall and debris flow zones because of the low exposure of humans at any one time



associated with this use. Construction of these facilities would be temporary and would adhere to mitigation measures as identified in Vol. IA, Chapter 2 of the *Final Yosemite Valley Plan/SEIS*.

643. Public Concern: The *Yosemite Valley Plan* should not require road relocation based on rockslide potential.

“The plan to relocate roads, etc., because of environmental concerns (i.e., rock slide danger) is patently wrong in all aspects. There has never been a problem with rockslides injuring people or damaging structures. The recent death was a so-called ‘heart attack’—the chances of being struck by a rock are miniscule—far less than being hit by falling debris in a city environment.” (Individual, No Address - #402)

Response: It is not the intention of the National Park Service to relocate facilities based solely on rockfall potential, but rather the combination of the rockfall hazard and the type of structure. Under the new Geologic Hazards Guidelines, all existing facilities will essentially remain in their present locations, including roadways. New facilities will be located based on the Geologic Hazards Guidelines.

485. Public Concern: The National Park Service should clarify its rationale designating roads as “noncontributing” in the *Yosemite Valley Plan*.

“Although the SEIS states in many sections that the proposal is to ‘remove noncontributing roads from Ahwahnee and Stoneman Meadows,’ how is it that the Park Service reaches this conclusion with knowledge that hundreds of thousands of visitors (including visitors with disabilities) utilize these noncontributing roads and access ways?” (Individual, San Diego, CA - #7884)

Response: The presence of roads within Yosemite Valley provides essential access for visitors and management consistent with the park's purpose: to make the unimpaired resources of Yosemite available to people for their enjoyment. In the *Final Yosemite Valley Plan/SEIS*, the park proposes to remove all nonessential roads from Yosemite Valley. Priority in removing nonessential roads is given to those that impact sensitive resources, such as meadows.

Where nonessential roads are removed for purposes of resource preservation, alternative means of access to areas will be provided. Access to Ahwahnee and Stoneman Meadows, and to areas served by roads currently running through these meadows, would be provided by existing parallel roads that are outside of the meadows. The Preferred Alternative would also increase pedestrian and bicycle paths throughout the Valley.

Note: One response is provided to concerns #711 and #710, and is placed following concern #710.

711. Public Concern: The *Yosemite Valley Plan* should require the removal of roads from Yosemite Valley meadows.

“There are some good options for the Park that are not considered in any of the plans: Removal of the road that goes through Cooks Meadow. This road should be put back to the trees to the south. This would create a lovely open meadow and reduce noise. . . The removal of the road through El Capitan Meadow. The road should be put in the trees to the north of the meadow.” (Individual, Malibu, CA - #3832)

“Northside Drive near Yosemite Village should be removed from Cook’s Meadow as prescribed in the 1997 Draft Yosemite Valley Implementation Plan.” (Individual, Oberlin, OH - #580)

“There is no mention of rerouting Southside Drive between the Swinging Bridge and the Sentinel Bridge where it goes right through the middle of Sentinel Meadow. I think Southside Drive should be rerouted out of the meadow either along the south side of the meadow, or better yet, in the trees south of the meadow.” (Individual, Modesto, CA - #3538)

Response: See response following concern #710 below.

710. Public Concern: The *Yosemite Valley Plan* should retain roads through meadows in Yosemite Valley.

“Leave roads through the meadows so people can view and experience the meadows and vistas in the way that provides the most access to all citizens and the least trampling.” (Individual, No Address - #7305)

“Do not remove roads through Stoneman and Ahwahnee Meadows.” (Individual, Modesto, CA - #7005)

Response: In Yosemite Valley, open meadows intermixed with other vegetation types are an important natural resource and cultural landscape component, and are recognized as a highly valued resource. As discussed in Vol. IA, Chapter 2 of the *Draft Yosemite Valley Plan/SEIS*, these highly valued resources will receive the greatest level of protection and restoration effort in order to achieve the goals of the 1980 *General Management Plan*. In the *Merced River Plan/FEIS*, river-related wetlands including some meadows are identified as one of the Outstandingly Remarkable Values for the Merced River in Yosemite Valley.

As described in the *Final Yosemite Valley Plan/SEIS*, Vol. IA, Chapter 3, Affected Environment, meadows in Yosemite Valley have undergone an unnaturally rapid decline in size and continuity over the past 150 years. One cause of this decline has been the change in hydrologic flows into meadows as a result of roads. Roads through meadows cause damming of surface and subsurface flows up-gradient, and unnatural drying down-gradient of roads, with consequent changes in vegetation composition. These unnatural water patterns can have impacts on adjacent vegetation such as oak woodlands that are kept unnaturally moist, leading to their more rapid demise. Vehicles and high densities of foot traffic adjacent to the pavement along "strip parking" lead to loss of native vegetation cover and eventual establishment of weedy species, which can then spread to less impacted areas of the Valley.

Actions proposed in the *Yosemite Valley Plan* seek to either remove or modify as many roads through meadows as possible to mitigate these problems. It is also recognized that the road alignments in Yosemite Valley are a significant contribution to the cultural landscape, providing access to views Valley-wide. These issues have been taken into account in the Preferred Alternative, with retention of some road sections through meadows. In these cases, roads will be modified to allow improved drainage underneath road prisms. These treatments are proposed to varying degrees in each of the action alternatives, with consequences outlined in Vol. IB, Chapter 4 of the *Final Yosemite Valley Plan/SEIS*.

Prior to proposing the relocation of roads in Yosemite Valley, the location of highly valued resources, pedestrian and stock trails, multi-use paved trails, and utilities were all considered. In some areas where roadway and trail corridors are present, there is not enough space outside of meadows to locate both roadway and trail corridors. An example of this is west of the chapel where there is only enough room for the Valley Loop Trail between the edge of the Valley floor and the edge of Sentinel Meadow. Retaining the Valley Loop Trail and relocating both the roadway and the multi-use paved trail out of the meadow is not possible because of spatial constraints.

(This response also applies to concern #711.)

157. Public Concern: The *Yosemite Valley Plan* should require the construction of a new road to East Valley campgrounds.

“The final piece of the plan for resolving the traffic-related problems in the Valley is to create a new road to the campgrounds in the east end of the Valley, thereby allowing campers to completely bypass the Curry parking lot area. This proposed road would be on an existing roadbed, and reestablishes the road which was eliminated many years ago. This road would start at the north/west corner of the Upper River Campground (off the existing major one way loop Valley road), cross the Ahwahnee and Sugarpine bridges, past the Indian Caves, south at the foot of the Mirror Lake road, on to the stables area, past the Upper and Lower Pines Campgrounds and rejoin the existing road to Happy Isles. This entire road section would be almost entirely in wooded areas so as not to be seen from Glacier Point, which is another factor in its favor.” (Individual, American Canyon, CA - #907)



Response: The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* proposes that access to the campgrounds in the east Valley would be provided along a new road connection along the north edge of Curry Village, south of the existing day-visitor parking area at Curry Orchard. The existing road across Stoneman Meadow would be removed and this area would be restored. Establishing a road on the north side of the east Valley would preclude the removal of the Sugar Pine Bridge, thus reducing the ability of the National Park Service to restore the natural dynamics and hydrologic processes of the Merced River.

126. Public Concern: The National Park Service should allow vehicle access to Mirror Lake.

“The road to Mirror Lake should be made accessible by car—now the only way to get there is by hiking & bicycling (for the young) or if one has a handicap card.” (Individual, San Francisco, CA - #67)

Response: As a principle day-use destination for visitors in Yosemite Valley, the Mirror Lake area was not considered for further development in the *Yosemite Valley Plan*. Management practices have changed significantly regarding the use and access of Mirror Lake over the past 30 years based upon new insights and respect of river process and integral riparian zones. The area known as Mirror Lake is a wetland area. A temporary pool formed by a rockfall was later enlarged by the placement of a rock dam. The “lake” was artificially maintained by dredging until 1971, and vehicle access was provided due to its popularity. Natural processes rather than artificial manipulation are now allowed to prevail. Additionally, the ecological impacts of numerous automobiles to fragile areas and their impact on visitor experience and the area’s natural beauty and processes is considered inappropriate. The multi-use paved trail is still available for walking and bicycle use. Vehicle access is allowed for those with mobility impairments.

593. Public Concern: The *Yosemite Valley Plan* should limit transportation facilities development in the Cascades area.

“[We object to] the addition of parking and tree removal at Cascades area before the 1997 high-water, and ongoing plans (see the zoning for the draft RMP) to accommodate more visitors there. The effects of the current resource destruction at Cascades by the non-NEPA decision to run an enormous rock-crushing/roadbed material/batch plant/etcetera operation at Cascades. The impacts are tremendous, and collectively these actions already prejudice the development of Cascades as a high-use visitor area. No consideration to the important cultural and biological resources was given.” (Conservation Organization, Yosemite, CA - #7883)

Response: The *Yosemite Valley Plan* does not propose the development of transportation facilities in the Cascades area. The existing parking lot and picnic area will remain in place and the area will continue to be used for recreational purposes.

4.13.2.c ~ Northside Drive

At the center of the Yosemite Valley traffic circulation debate is the Preferred Alternative’s proposal to close portions of Northside Drive to motor vehicles. This is reflected in public concerns that request the retention, closure, relocation, or physical modification of this road. Those who want Northside Drive to remain open to motor vehicles argue their position on the grounds of safety and access. Closing Northside Drive, some suggest, will merely shift traffic and congestion to Southside Drive. Such increased congestion coupled with visitors’ propensity “to sight-see and rubberneck as they drive along,” writes another, “may lead to the kind of inattention to driving and weaving about that soon results in nasty head-on crashes.” Others claim that visitor access will be unduly infringed upon by closing portions of Northside Drive. This, according to one person, is in violation of Title I and Title II of the Americans with Disabilities Act. Even if Northside Drive is closed, according to another, it should remain open for emergency vehicle use. People are also very concerned about the proposed relocation of

Northside Drive in the Yosemite Lodge area and generally argue against the proposal. Perceived adverse effects of relocation include destruction of oak habitat and increased noise in the Yosemite Lodge area from passing buses.

This section concludes with concerns advocating the closure, rerouting, and alteration of Northside Drive. Several respondents who are concerned about resource protection within the Valley request that portions of Northside Drive be closed, including the El Capitan Bridge to Pohono Bridge segment and the Yosemite Lodge to El Capitan Crossover segment. One person suggests that the National Park Service reroute Northside Drive between the Village Store and Degnan's Deli in an effort to reduce redundant roads that "absorb valuable parking space in Yosemite Village." Rather than closing Northside Drive to vehicles, cement barriers should be constructed on both Northside and Southside drives to separate vehicles from bikes, according to some. This would maintain existing circulation and help slow traffic, they claim. And, finally, it is suggested that asphalt on Northside Drive be replaced with gravel. This, states one testifier at a public hearing, "would be nicer for hikers, and it might also be more accommodating to wildlife." Presumably, such a conversion would take place after the road has been converted to a multi-use trail, though the respondent does not make that point clear.

29. Public Concern: The *Yosemite Valley Plan* should retain Northside Drive for motor vehicle traffic.

"On the whole, I find the plans to be pretty workable with one exception—the elimination of part of the existing north exit road between the Lodge and the meadow below El Capitan (approximate end points). First of all, I assume this is going to make it necessary to make part of the old incoming road two-way, which considering the proclivity of incoming visitors to sight-see and rubberneck as they drive along . . . may lead to the kind of inattention to driving and weaving about that soon results in nasty head-on crashes. At least when everyone is traveling the same direction this impact is lessened." (Individual, Aptos, CA - #15)

"Northside Drive should be retained. The elimination of this drive will increase traffic congestion in the Lodge, Village and Sentinel Bridge areas. The better choice would be to change Northside Drive to a combination one-way road and trail. See Alternative 5." (Individual, Santa Barbara, CA - #109)

"Although we understand the rationale, we don't approve of closing Northside Drive to vehicles. Why? Simple. It would basically shut us or anyone else not in excellent physical condition or with small children out of that part of the Valley. Besides, we like the one-way traffic circulation approach as it is much safer than two-way. Also, it has been intimated that the Northside Drive interferes with the hydrology of the meadows, so removing it would allow the natural processes to take place. However, if you can build a biking/hiking trail in its place that is also suitable for emergency vehicle traffic, we're sure you could just redo the present road to the same specifications and thus keep that road open." (Individual, Oakhurst, CA - #3379)

"The proposal to eliminate the North Drive to only hikers and bike riders is a very unfair plan. It is a beautiful and refreshing drive and has several lovely places to stop and enjoy a picnic lunch or enjoy the beautiful view of the river or meadow. The proposed plan would eliminate the opportunity for the elderly and infirm to take advantage of this delightful experience." (Individual, Cupertino, CA - #51)

"Don't close Northside Drive to cars. The current one-way loops are the key to avoiding traffic problems while allowing visitors to drive very slow (occasionally stopping at vehicle pulloffs to take pictures, etc.) so that they can enjoy the entire Valley. Driving this loop (with occasional stops) is very important to many people if they want to have the complete Yosemite Valley experience." (Individual, Groveland, CA - #380)

COMPLIANCE WITH AMERICANS WITH DISABILITIES ACT

"If, as proposed in Alternative 2, the preferred alternative, the Northside road is removed between Yosemite Creek and El Capitan, this will effectively remove about 1/3 of the Valley experience from access by elderly and disabled



people. It cannot obviously then 'continue as presently existing.' If there is no road, there is no access. It seems that restricting access of elderly and disabled to any area of the park provided to other people is in clear violation of the Americans with Disabilities Act, both Title I and Title II, and can lead to long and contentious litigation. The Northside road should not be removed." (Individual, No Address - #3502)

Response: As part of the Preferred Alternative in the *Final Yosemite Valley Plan/SEIS*, Northside Drive would be closed to vehicle traffic from Yosemite Lodge to El Capitan crossover in order to provide a multi-use paved trail and to offer visitors an area near the Merced River that would be essentially free of traffic. Closing this portion of Northside Drive to vehicular traffic would necessitate that Southside Drive be converted to two-way traffic from Sentinel Bridge to El Capitan crossover.

The traffic management strategies and changes to overnight visitor capacity proposed in the Preferred Alternative would result in a decrease in traffic on Southside Drive east of El Capitan crossover and Sentinel Bridge, even two-way traffic. The traffic volume on Southside Drive would be similar to or less than the volume of traffic using two-lane, two-way roads elsewhere in the park and on entrance roads. By removing the vehicle trips exiting the park from Northside Drive, traffic congestion in the area of the Yosemite Lodge would be reduced. Traffic congestion in Yosemite Village also would be reduced because visitors exiting the park from Curry Village and the campgrounds would travel along Southside Drive, rather than through Yosemite Village. Traffic flow would also be improved at the intersections of Sentinel Road with Northside Drive and Southside Drive.

Other two-way roads in Yosemite National Park and entrance roads from gateway communities currently carry a volume of traffic similar to that projected for Southside Drive without unacceptable impacts to emergency vehicles. There is no evidence that two-way traffic presents a safety hazard. Traffic accident rates on two-lane, two-way roads throughout the National Park System are low. A detailed engineering study of Southside Drive would be performed to identify needed improvements and to ensure the road would be safe for the types of vehicles expected to use it.

Adequate turnouts would be provided to allow slower vehicles, such as Valley Tour trams, to be passed by other vehicles. Two-way operation of Southside Drive could result in somewhat slower travel, but the benefit to visitor experience of a long stretch of the north side of the Merced River that is not affected by vehicle traffic is shown by the analysis in the plan to outweigh the inconvenience that slower traffic would cause.

615. Public Concern: The *Yosemite Valley Plan* should maintain Northside Drive for emergency motor vehicle use.

"There are still going to be people in the Park—accidents and emergencies will occur. Restricting the Southside road to one lane each way will inhibit emergency vehicles in traffic with perhaps the cost of lives. Winter conditions make it even worse. If it is determined, in spite of these considerations, that the Northside road should be closed to traffic, it should not be removed. It should be kept open and serviceable for such emergencies and, of course, as an escape route in case of naturally occurring catastrophes (earthquake, fire, and as we have experienced, flooding)." (Individual, No Address - #3502)

Response: Under the Preferred Alternative of the *Final Yosemite Valley Plan/SEIS*, Northside Drive is proposed to be closed to vehicle traffic from Yosemite Lodge to El Capitan crossover in order to provide a multi-use paved trail to offer visitors an area near the Merced River that is unaffected by traffic. The closure of this portion of Northside Drive to vehicle traffic would necessitate that Southside Drive would be converted to two-way traffic from Sentinel Bridge to El Capitan crossover. Other roads in Yosemite Valley and the park that are two-directional currently carry similar volumes of traffic as that projected for Southside Drive without negatively impacting the operation of emergency vehicles.

The National Park Service has evaluated emergency access needs in Yosemite Valley. The closure of Northside Drive to private vehicles would not preclude the use of Northside Drive for emergency

purposes. It is anticipated that Northside Drive will remain in place and simply be converted to recreational uses.

160. Public Concern: The *Yosemite Valley Plan* should prohibit the relocation of Northside Drive in the Yosemite Lodge area.

“Once Northside Drive is closed to autos east of Yosemite Lodge, there shouldn’t be much traffic or many conflicts on this road. Foregoing the relocation will both save money and support the principle of ‘an undisturbed natural area is preferable to a restored one.’” (Individual, Oberlin, OH - #580)

“A portion of Northside Drive is proposed for relocation south of the Yosemite Lodge along the banks of the river and the construction would involve the destruction of numerous old oak trees. Why construct a road in such an environmentally sensitive area?” (Individual, Richmond, CA - #373)

“Action: Reroute Northside Drive around the southern perimeter of Yosemite Lodge. . . Result: Severely degrades the southern perimeter of Yosemite Lodge, including many retained visitor accommodations, with high and frequently recurring levels of vehicular noise (75 dbA to 80 dbA), because of the close proximity of the road. The passage of outbound, out-of-Valley buses through this area would result in a major sound disturbance here every few minutes, from early in the morning until late in the evening. This change should not take place.” (Individual, Los Angeles, CA - #470)

Response: In the Preferred Alternative, Northside Drive would be relocated south of the current development in Yosemite Lodge. In fact, in one area, three motel buildings would be removed to accommodate the new road alignment. The road is being realigned for several reasons: to eliminate the physical barrier between Yosemite Lodge and Yosemite Falls, to eliminate conflicts between pedestrians and vehicles at the Lodge/Falls intersection, to help in changing the character of Yosemite Lodge from one dominated by cars and parking to a smaller scale, pedestrian-friendly place, and to provide more efficient circulation and parking in the Yosemite Lodge and Camp 4 (Sunnyside Campground) area. The new road alignment would be located away from the Merced River and would be designed to preserve existing highly valued resources, including oak woodland communities. Areas currently affected by development that would be between the new road and the Merced River would be restored to natural conditions consistent with highly valued resources.

30. Public Concern: The *Yosemite Valley Plan* should require the closure of Northside Drive to motor vehicle traffic.

“Convert Northside Drive to non-motorized transportation.” (Individual, No Address - #30003)

CLOSE EL CAPITAN BRIDGE TO POHONO BRIDGE SEGMENT

“I would get rid of the road between El Capitan Bridge & Pohono Bridge on the El Capitan side.” (Individual, Mountain View, CA - #109)

CLOSE YOSEMITE LODGE TO EL CAPITAN CROSSOVER SEGMENT

“We should close the Northside Drive to vehicles from Yosemite Lodge to El Capitan Crossover. Obviously this would limit visitor activities but protect this highly valuable resource for future generations. By protecting this highly valuable resource we may not be able to handle as many visitors as we have in the past but isn’t that why we hired professionals?” (Individual, Malibu, CA - #3832)

Response: The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* proposes closing Northside Drive to motor vehicle traffic from Yosemite Lodge to the El Capitan crossover. The road would be converted to a multi-use paved trail reserved for the use of hikers and bicyclists, although it would still be available for emergency use whenever necessary. The result would be a quieter, safer experience for pedestrians and bicyclists as they access the central portion of Yosemite Valley on a trail separated from



the immediate presence of motor vehicles. Closing Northside Drive to motor vehicles west of the El Capitan crossover would require the rerouting of traffic at the intersection of Northside Drive and the Wawona Road, the redesign of the Pohono Bridge river crossing, and the loss of west Valley drive-through opportunities for visitors not driving to east Valley destinations. The segment of Northside Drive through the former Lower Rivers and Upper Rivers Campgrounds would also be closed under the Preferred Alternative and a multi-use trail would be relocated to provide pedestrian and bicycle access to this area.

616. Public Concern: The *Yosemite Valley Plan* should consider an alternate route for Northside Drive in Yosemite Village.

“I understand that routing all traffic in front of the Ranger Club would destroy its historic setting, but NPS could still route all Ahwahnee traffic in front (west) of the Village store and then right between the Village Store and Degnan’s Deli. Redundant roads should not absorb valuable parking space in Yosemite Village.” (Individual, Fresno CA - #20511)

Response: The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* recommends that Yosemite Village Drive be rerouted around the perimeter of the Village so as to minimize conflicts between pedestrians and vehicles. The Yosemite Village area is one of the most highly visited areas in the Valley, offering visitor services, parking, and shuttle operations. Based on the initial conceptual development plans, the visitor facilities would be located adjacent to day-use visitor parking and shuttle operations so that it is not necessary for pedestrians to cross Yosemite Village Drive. In addition, Northside Drive would be converted to a multi-use paved trail and closed to vehicle traffic from Yosemite Lodge to El Capitan crossover under the Preferred Alternative.

193. Public Concern: The National Park Service should construct bike path dividers along Northside and Southside Drives rather than change traffic circulation patterns.

“If we need a bike path on the Northside Drive, just block off part of it with a cement barrier and put cars on one side of the barrier and bikes on the other side. This could also be done on the Southside Drive making both of them one way, but with only one lane. The cars would go more slowly because of a single lane and you would thus keep all the cars within the speed limit.” (Individual, Ceres, CA - #1220)

Response: The *Final Yosemite Valley Plan/SEIS* considers this approach in Alternative 5 as a means of providing a multi-use paved trail for the portion of Yosemite Valley east of El Capitan crossover and west of Yosemite Lodge and Swinging Bridge, a substantial benefit to bicyclists. West of El Capitan crossover, traffic volume would be too high to allow conversion of one lane of traffic to use as a multi-use paved trail. The principal disadvantage of this approach, however, is that motor vehicle traffic would be consistently and immediately adjacent to the trail, making the trail more a means of traveling from one location to another rather than a predominantly resource-based experience. This approach could have been utilized in other alternatives, including the Preferred Alternative, but it is believed that the opportunity for a mostly natural area without the presence of motor vehicles between Yosemite Lodge and the El Capitan crossover had greater benefits for visitor experience than the bicycle lane adjacent to traffic lanes.

583. Public Concern: The *Yosemite Valley Plan* should require that Northside Drive be reconstructed using gravel instead of asphalt.

“I think [the Northside Drive area] should be definitely closed to motor vehicles. I’m wondering if there’s a possibility of replacing the asphalt with gravel or . . . Sandstone-like substance that could still be accessed by emergency vehicles but would add to the scenic value. It wouldn’t be black asphalt, and it would be nicer for the hikers, and it might also be more accommodating to wildlife, if you’re hoping to increase wildlife in that area by

decreasing motor vehicles. And it might be easier for wildlife to cross those roads versus asphalt.” (Public Hearing, San Diego, CA - #20444)

Response: As described in Vol. IA, Chapter 2, Alternative 2, of the *Final Yosemite Valley Plan/SEIS*, Northside Drive (from Yosemite Lodge to El Capitan crossover) would be closed to vehicles and converted to a multi-use paved trail.

Trails in Yosemite Valley receive heavy use from bicycles as well as pedestrians and provide some access for visitors with disabilities. National Park Service management policies provide for the paving of trails for the protection of resources and for the safety and convenience of travelers. Paved bicycle trails mitigate potential damage to trails and adjacent vegetation. With the limited space available in Yosemite Valley, multiple uses of trails must be available to the extent practicable. However, the longest trail in Yosemite Valley, the 13-mile Valley Loop Trail, would remain unpaved.

4.13.2.d ~ Southside Drive

Since one result of closing Northside Drive is the conversion of Southside Drive circulation from one-way to two-way traffic, the reader will note some overlap in comments on Northside and Southside Drives and Valley circulation. Nevertheless, public concerns in this section focus on Southside Drive and either question the adequacy of analysis and level of detail provided in the *Draft Yosemite Valley Plan/SEIS* or address the sufficiency of lane width.

Given the potential safety hazards of two-way traffic on Southside Drive (such as slow-moving sightseeing vehicles) several people request that a safety analysis be conducted of Southside Drive traffic circulation. Another respondent questions the *Draft Yosemite Valley Plan/SEIS*'s analysis of how many day-use vehicles Southside Drive will be able to accommodate.

A number of individuals address widening of Southside Drive. One conservation organization asks for clarification of the “necessary widening” definition in the *Draft Yosemite Valley Plan/SEIS*. As it now stands, the group claims, widening “could be interpreted as increasing the width to four or six lanes.” Others contend that Southside Drive needs sufficient lane width to accommodate both motor vehicles and bicycles (also see Section 4.13.3.b ~ Bicycle Trails). This view, however, is not shared by all. One person urges the National Park Service to exclude widening of Southside Drive from the Yosemite Valley Plan. To do otherwise, this respondent argues, would jeopardize Merced River riparian areas and oak woodlands.

80. Public Concern: The National Park Service should conduct a safety analysis of proposed changes to Southside Drive traffic circulation.

“A three-phase approach is given for implementation of the DYVP with conversion of Southside Drive in Phase-1 and closure of Northside Drive in Phase-3, with presumably a gap of some years. Out-of-Valley parking for visitors is not planned until Phase-3 so that there will be no reduction of visitor cars on Southside Drive for some time. I see no analysis of safety hazards for this proposed two-way section. . . Also, I see no mention of the impact of sightseeing trams that may well go slower than anything else. This is a definite safety hazard. Virtually all of the picnic areas and scenic pullouts are located on the north side of Southside Drive and will create an access hazard for east bound traffic attempting to turn left. Any closure of Southside by rockfall or debris flow would isolate the east end of the Valley. I would hope that an option not to close Northside Drive would remain available should two-way traffic on Southside create more problems than it solves.” (Individual, Mountain View, CA - #151)

“With the elimination of the Northside Road there will be two-way traffic on the Southside Road. Will this create a safety issue, never mind the increased traffic? The Northside Road also provides some of the best (photographic) vistas in the Park. Not anymore, unless you want to hike for about an hour or more each way.” (Individual, Oakland, CA - #281)



Response: The traffic management strategies and changes to overnight visitor capacity would result in a decrease in traffic using Southside Drive east of El Capitan crossover, even with two-way traffic. The traffic volume on Southside Drive would be similar to or less than the volume of traffic using two-lane, two-way roads elsewhere in the park and on entrance roads. There is no evidence that two-way traffic presents a safety hazard. Traffic accident rates on two-lane, two-way roads throughout the National Park System are low. A detailed engineering study of Southside Drive would be performed to identify needed improvements and to ensure safe operation of the road for these vehicles that would use the road.

Adequate turnouts would be provided to allow slower vehicles, such as Valley Tour trams, to be passed by other vehicles. Two-way operation of Southside Drive could result in somewhat slower travel, but the benefits to visitor experience of providing a long stretch of the north side of the Merced River that would not be affected by vehicle traffic are assumed in the plan analysis to outweigh the inconvenience that slower traffic could cause.

Northside Drive would not be removed. It would be closed to everyday use by motor vehicles. In the event that Southside Drive had to be closed temporarily because of rockfall or other events, Northside Drive could be used for emergency access and egress.

Historic viewpoints on the western portion of Northside Drive, such as El Capitan Meadow, Hanging Valley, and Valley View would continue to be accessible by private vehicle. Short-term parking for photography and viewing would continue to be available. Viewpoints on Northside Drive between El Capitan crossover and Yosemite Lodge could be reached by walking or biking from the lodge or from a shuttle stop on Southside Drive at El Capitan crossover. The maximum walking distance between any two locations on Northside Drive would be 1.3 miles. At an average pace, this distance could be walked in 30 to 40 minutes.

578. Public Concern: The National Park Service should reassess the maximum number of day-use vehicles that Southside Drive can support.

“The Plan states that with 2-way traffic on Southside Drive, only a maximum of 800 day-use cars can be supported. This number is outrageously low. The present 2 lanes each way support 5000 day-use cars, 7200 vehicles total entering the Valley, plus all the short trip driving within the Valley that is presently allowed (several thousand trips). The Plan may not be accounting for the reduction in traffic due to 5000 campers/lodgers being required to leave their vehicle in its assigned space.” (Individual, San Diego, CA - #3479)

Response: During the planning process for the *Draft Yosemite Valley Plan/SEIS*, the National Park Service conducted a level-of-service analysis to determine the maximum number of vehicles that can be supported on Southside Drive from Pohono Bridge to the Chapel. In general terms, level-of-service is a transportation planning and engineering index to describe the level of congestion experienced by motorists. The index ranks roadways from "A" (free-flow conditions with no deterioration of travel speeds caused by other vehicles) to "F" (extreme congestion with stop and go traffic movements). Under the *Final Yosemite Valley Plan/SEIS*, traffic on Southside Drive is projected to operate at level-of-service "D" assuming no roadway improvements are made to Southside Drive. If roadway modifications are undertaken, traffic conditions could improve to level-of-service "C". Other roadways in the Valley have lower capacities than Southside Drive and would be considered when planning for overall traffic volumes in the Valley.

532. Public Concern: The *Yosemite Valley Plan* should provide additional detail about plans to widen Southside Drive.

“The ‘necessary’ widening [page 2-28] is undefined. Again, the extent of the widening is left to the whim of the decision-maker. ‘Widening’ could be interpreted as increasing the width to four or six lanes. This is not inconceivable since the widened Southside Drive will be replacing two eastbound lanes on the south side and two

westbound lanes on the north side. Additionally, this would be consistent with the proposed construction of the multi-lane traffic check station. Furthermore, the comments submitted by Representative George Radanovich, indicate that the proposed traffic check-point will consist of 10 lanes; although we have not been able to identify this specification with a computer search on the CD-ROM version of the Plan.” (Conservation Organization, Mariposa, CA - #9224)

Response: Under the Preferred Alternative of the *Final Yosemite Valley Plan/SEIS*, Southside Drive is proposed to be converted to two-way traffic with one lane in each direction. From El Capitan crossover through Curry Village, the roadway could be widened to accommodate up to 11-foot lanes and 2-foot wide shoulders each direction. Vol. IA, Chapter 2 of the *Final Yosemite Valley Plan/SEIS* describes the overall operational and initial design characteristics of the roadway system in this area. Detailed design characteristics will be finalized in planning efforts subsequent to the *Final Yosemite Valley Plan/SEIS*.

127. Public Concern: The *Yosemite Valley Plan* should provide sufficient lane width on Southside Drive to accommodate motor vehicles and bicycles.

“Ensure sufficient lane width on Southside Drive so that drivers of cars, SUVs, buses and RVs can safely share the road with bicyclists.” (Individual, No Address - #30003)

“We realize that in Alternative 2, you would close the North Road. We want to make sure that on the Southside Drive, that’s going to remain open, there would be adequate lane width for bicycles on there, as well as the RVs, bikes, and cars because there will be people who won’t want to use the bike path that’s going to be provided, because it’s going to be full of people walking, baby strollers, and all of those sorts of things. People who are in a little bit of a hurry are going to be on that road anyway, and it would be good if you guys planned for that in advance.” (Public Hearing, San Diego, CA - #20431)

Response: The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* calls for widening Southside Drive from El Capitan crossover to Curry Village to accommodate two-way traffic where required for safety and operational efficiency. The proposed width of Southside Drive is 26 feet, which would accommodate 11-foot travel lanes and 2-foot paved shoulders on each side of the two-way road. This width would be sufficient to accommodate traffic and the small number of cyclists who would use the roads to travel into the Valley.

Bicycles would not be prohibited from sharing the road with general traffic. In addition, new multi-use paved trails designed for use by bicycles would be provided on the north and south sides of the Merced River from El Capitan crossover to Yosemite Village. A new multi-use paved trail would serve bicyclists traveling between Yosemite Village and the campgrounds and Curry Village via the Ahwahnee Bridge.

678. Public Concern: The *Yosemite Valley Plan* should prohibit widening Southside Drive.

“Please—no widening or adding lanes to Southside Drive. Widening this segment would involve major riparian destruction, destruction of rare Valley oak woodlands, ancient trees and go into the river itself. Instead a good River Plan would preclude this destructive project and the Valley Plan should follow that.” (Individual, No Address - #6504)

Response: Northside Drive is proposed to be closed to vehicle traffic from Yosemite Lodge to El Capitan crossover in order to provide a multi-use paved trail and to offer visitors an area near the Merced River that is relatively free of traffic. Closing Northside Drive would necessitate that Southside Drive be converted to two-way traffic from Sentinel Bridge to El Capitan crossover.

The traffic volume on Southside Drive would be similar to or less than the volume of traffic using two-lane, two-way roads elsewhere in the park and on entrance roads. By removing the vehicle trips exiting the park from Northside Drive, traffic congestion in the area of the Yosemite Lodge would be reduced.



Traffic congestion in Yosemite Village would also be reduced because visitors exiting the park from Curry Village and the campgrounds would travel along Southside Drive, rather than through Yosemite Village. Traffic flows would also be improved at the intersections of Sentinel Road with Northside Drive and Southside Drive.

The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* calls for widening Southside Drive to provide 11-foot travel lanes and 2-foot shoulders on each side of the two-way road. A detailed engineering study of Southside Drive would be performed prior to this action being implemented to confirm needed improvements, to assure the safety of those using the road and to minimize resource impacts. Two-way operation of Southside Drive may result in somewhat slower travel, but the benefits to visitor experience of providing a long stretch of the north side of the Merced River unaffected by vehicle traffic are assumed in the plan's analysis to outweigh this inconvenience.

The *Final Yosemite Valley Plan/SEIS*, Vol. IB, Chapter 4, Environmental Consequences, provides a description of the impacts associated with potentially widening Southside Drive to 11-foot travel lanes with 2-foot shoulders.

4.13.2.e ~ El Portal Road

Many people argue against further improvements to the El Portal Road. Some question the adequacy of the El Portal Road Improvement Project's environmental analysis. Hence, one conservation organization asks the National Park Service to analyze the cumulative environmental impacts of roadwork in the Merced River Gorge. Those who oppose widening and reconstructing the road overwhelmingly cite the potentially harmful ecological effects of the project as the basis for their positions. Moreover, "the ecological damage already done through widening the more westerly portions of the El Portal Road should be reversed through a process of restoration," writes one person.

537. Public Concern: The *Yosemite Valley Plan* should include a cumulative effects analysis of the El Portal Road project.

"The environmental effects of the El Portal Road Project (ongoing) are never discussed or quantified. The NPS owes the public a comprehensive analysis and view of what it has done to the Merced Gorge environment (ecology, scenery, hydrology, safety, etcetera) for the purpose of cumulative impact analysis in the VP." (Conservation Organization, Yosemite, CA - #7883)

Response: Future reconstruction of the El Portal Road between the Cascades Diversion Dam and Pohono Bridge (Segment D) is an element of all *Yosemite Valley Plan* action alternatives. Consequently, the impacts resulting from construction of this segment are presented in Vol. IB, Chapter 4, Environmental Consequences. Subsequent environmental compliance would be necessary to complete this project, and the project would be guided by both the *General Management Plan* and the *Merced River Plan/FEIS*.

Reconstruction of the El Portal Road between the park boundary at El Portal and the Cascades Diversion Dam has been completed, and is analyzed in the *Final Yosemite Valley Plan/SEIS* in the cumulative impact analysis for the various resources. Cumulative impacts were analyzed based upon the description of the present project found in Vol. II, Appendix H, Cumulative Impact Scenario (see Vol. IB, Chapter 4, Cumulative Impact Analysis). Environmental compliance for this project was prepared, which included mitigation measures that have been and will continue to be implemented. Examples of measures employed included weed control at staging areas and throughout the project site, construction compliance monitoring, revegetation, fencing of sensitive resource areas, and long-term monitoring.

215. Public Concern: The *Yosemite Valley Plan* should prohibit improvements to the El Portal Road.

“Further damage to the Park must not be done by widening the El Portal Road east from the junction of Highways 120/140 to Pohono Bridge.” (Individual, Portland, OR - #1121)

“No environmental impact statement has been prepared on the effects of reconstructing that segment. The ecological damage already done through widening the more westerly portions of the El Portal Road should be reversed through a process of restoration (including the construction staging areas).” (Individual, Fresno, CA - #7881)

“I am concerned that the proposed Valley Plan allows continued ‘improvement’ of the highway in the Merced River Canyon, to the detriment of the river and canyon.” (Individual, Richmond, CA - #224)

“Under no circumstances should the river road from the Pohono Bridge to the Big Oak Flat turnoff be butchered like the road to the Park boundary. It is outrageous that these sections of roads are being enlarged while vehicle traffic is being discouraged in the Valley.” (Individual, Berkeley, CA - #9238)

“On the Cascades Impoundment-Pohono Bridge road segment, the decision to destroy additional ancient oak trees, blast additional rocks, fill more river channel, reinforce more embankment, etc. needs also to be seen in the context of local (Merced Gorge) and regional Sierran River stream ecological and scenic losses. We object to any proposal to widen this road segment.” (Conservation Organization, Yosemite, CA - #7883)

Response: In July 1999, a federal court ruled that the existing sections of the El Portal Road already under construction could be completed despite inadequacies in the underlying planning process. This ruling covers the segment of road extending from the park boundary in El Portal to the intersection of El Portal Road and Big Oak Flat Road. The judge also ruled that the final section of the road construction (from the intersection of El Portal Road and Big Oak Flat Road to Pohono Bridge) could not be undertaken until a comprehensive management plan was completed for the Merced Wild and Scenic River and, if necessary, additional environmental analysis completed.

The *Merced River Plan/FEIS* was completed in June 2000, and the Record of Decision was signed in August 2000. The plan allows for the removal of Cascades Diversion Dam and directs that the associated section of the river be reclassified from “recreational” to “scenic” if the dam were removed. Reconstruction of the road from Pohono Bridge to the Big Oak Flat Road intersection is also allowed in the plan if it is determined that it will not adversely affect the Outstandingly Remarkable Values for which the river was designated Wild and Scenic. Compliance with Section 7 of the Wild and Scenic Rivers Act would be undertaken for both projects.

The *Final Yosemite Valley Plan/SEIS* calls for the Cascades Diversion Dam to be removed and the natural river channel to be restored. The removal of the dam would require additional regulatory compliance and public involvement.

The *Final Yosemite Valley Plan/SEIS* also calls for the road from Pohono Bridge to the El Portal Road/Big Oak Flat Road intersection to be reconstructed after the natural river channel has been re-established and additional regulatory compliance and public involvement have been completed. This section of road was severely damaged by the January 1997 flood and is in danger of collapsing. Should this section of road collapse, the Valley’s main wastewater line under the road could be ruptured, possibly resulting in untreated wastewater spilling into the Merced River. Such a collapse could also cut off access to Yosemite Valley from three of the four primary access corridors. This section of road is also hazardous for buses and other large vehicles. Any design for reconstruction of this section of road would have to comply with the Wild and Scenic Rivers Act, including the mandate to protect the Outstandingly Remarkable Values of the Merced River.



4.13.3 ~ Trails

This section includes analysis of public comment addressing the transportation function of pedestrian and bicycle trails. For the recreational aspect of trails see Section 4.11.2.c ~ Trail Use, or for horse trails see Section 4.11.2.d ~ Stock Use.

4.13.3.a ~ General Management Direction

Many respondents do not dispute that trails are an important part of Yosemite Valley's transportation system, however, where and how trails are constructed is. Several people request that the National Park Service improve the trail system in Yosemite Valley. Since "people are like lemmings," according to one individual, "they will walk where there is a trail marked and cause less damage to soil than if they forge their own trail." Possible improvements to the system might include a Valley loop trail, maintained trail tread, and better directional and informational trail signs. Even more extensive changes to the Yosemite Valley trail system are suggested by others. They recommend replacing roads with pedestrian and bicycle trails, creating nonpaved, multi-use trails in the Valley, and rerouting the proposed Curry Village to Yosemite Village pedestrian and bicycle path over Stoneman Bridge. Regardless, for some individuals, if new paved trails are part of the National Park Service's Preferred Alternative, the potential adverse impacts of these trails—like safety hazards and conflicts between pedestrians, bicycles, and vehicles—should be analyzed. Finally, one person asks the park service to "implement a more aggressive policy to encourage people to stay on trails."

57. Public Concern: *The Yosemite Valley Plan* should require improvements to the trail system in Yosemite Valley.

"Restore paved trails from Lodge to El Cap crossover and behind chapel to Bridalveil Falls. People are like lemmings; they will walk where there is a trail marked and cause less damage to soil than if they forge their own trail. Build/make a trail on Southside Drive from Pohono Bridge to El Cap crossover to Swinging Bridge area. Make it possible for people to hike/bike a loop around west Valley." (Individual, Yosemite National Park, CA - #201)

"Trail maintenance and signs (Valley Circling Trail): clear the trail tread and fix the roughest spots (don't need to re-asphalt); simple marker posts at trail forks and junctions (and certain specific distances?); trail access signs at branch trails leading to and from bus stops, popular sights, day parking areas, etc. (could be small with special logo); overall name for trail system emphasizing its scope and purpose—an example would be the Bay Area Ridge Trail; informational signs, graphics, etc. at locations like the Village plaza, Camp Curry, and in the Park brochure." (Individual, Mountain View, CA - #63)

Response: Generally, in the Preferred Alternative of the *Final Yosemite Valley Plan/SEIS*, dual trails would be provided throughout the east and mid-Valley. One unpaved trail would be available to pedestrians and stock users, and the second multi-use paved trail would be used by pedestrians and bicyclists. In the Preferred Alternative, trails west of the El Capitan crossover would be limited to the unpaved Valley perimeter trail, because establishing a second multi-use trail would require substantial modification of the natural environment in the narrowest sections of the Valley.

In addition to adding more trails, the Preferred Alternative would improve existing Valley trails and their directional signs and realignment of some existing trails.

174. Public Concern: The *Yosemite Valley Plan* should require that some roads in Yosemite Valley be replaced with pedestrian and bicycle trails.

“I also feel it [would be] beneficial to take out some of the roads and put in foot paths for the pedestrians & cyclists. I feel this would help in maintaining the Valley and keeping the car traffic all around the Park down to a minimum.” (Individual, Winters, CA - #20070)

“We agree with your encouraging both hiking and biking on multi-use trails, including the conversion of Northside Drive.” (Individual, Camp Sherman, OR - #1801)

Response: In the Preferred Alternative, the road through the former Upper River and Lower River Campgrounds would be removed and replaced by a relocated multi-use paved trail. (Also see response to concern #57.)

426. Public Concern: The *Yosemite Valley Plan* should reroute the proposed Curry Village to Yosemite Village pedestrian/bicycle path over Stoneman Bridge.

“The proposed pedestrian/bicycle path from Curry Village to Yosemite Village via the Ahwahnee Bridge has several problems. The area just to the southeast of the bridge by the slough is very prone to spring and early summer flooding, which will cause difficulty in building and maintaining a path. Also a bridge will have to be constructed over the slough. When this area is flooded, pedestrians at Curry Village will have to walk all the way to Sentinel Bridge to cross the river. This will result in less walking and more shuttle bus riding. The path is proposed to pass through the western edge of Stoneman Meadow. This area of the meadow is already worn down due to extensive use and will need a boardwalk or other reclamation. A more reasonable solution would be to retain Stoneman Bridge as a pedestrian/bicycle bridge and tie into the existing path that passes through the western edge of the old Lower Pines Camp and continues on to Camp 6 and Yosemite Village.” (Individual, Lodi, CA - #4474)

Response: The *Draft Yosemite Valley Plan/SEIS* identified three bridges (including Stoneman Bridge) for removal in the Preferred Alternative due to their severe impacts on Merced River hydrologic processes. In response to public comments, the *Final Yosemite Valley Plan/SEIS* proposes, instead, a phased approach to bridge removal. Stoneman Bridge would be removed only if the removal of Sugar Pine Bridge does not restore natural river dynamics to the river to a sufficient degree. If Stoneman Bridge remains, it would continue to provide a multi-use trail link between Curry Village and Yosemite Village. If removed, the inconvenience to many visitors that would be caused by rerouting the trail would be offset by their enhanced experience of a river restored to a more free-flowing character. (Also see response to concerns #12 and #753.)

680. Public Concern: The *Yosemite Valley Plan* should analyze the impact of new paved trails on safety and visitor experience in Yosemite Valley.

“Although the Park Service is proposing the construction of new paved trails (next to existing vehicular and bus roads), these new trails would not provide the direct connection across the Valley and would introduce potentially new conflicts and safety hazards between pedestrians, bicycles, automobiles, and buses. The existing paved and improved bike and pedestrian trails (where cars and buses are not allowed) provide for breathtaking views and enjoyment of the forest and scenery, without the noise associated with automobiles and buses. This adverse impact is not analyzed at all in the SEIS.” (Business, San Diego, CA - #7884)

Response: The potential impacts of new paved trails on safety and visitor experience in Yosemite Valley have been considered and are discussed in Vol. IB, Chapter 4, Environmental Consequences of the *Final Yosemite Valley Plan/SEIS* for each alternative under the Bicycling section.



246. Public Concern: The *Yosemite Valley Plan* should establish nonpaved, multi-use trails in Yosemite National Park.

“The policy that bikes always belong on pavement is counter productive. Paved trails are less aesthetic to mountain bikers. Dirt is the way; and maintain. Gravel paths can allow ground water flows where paved bike roads are more of an impact. Dirt or gravel trails in the non-wilderness portions of Yosemite National Park open to bicycles are an important part of creating a Valley-wide and Park-wide non-motorized alternative transportation system.” (Individual, Mammoth Lakes, CA - #1443)

“I question the need for paved multi-use trails and wonder if it would be possible to have at least some soft-surface trails for a less ‘industrial’ or city-like setting; we don’t need to roller skate with baby carriages in the national parks.” (Individual, Boulder, CO - #9231)

Response: Trails in Yosemite Valley receive heavy use from bicycles as well as pedestrians. Paved trails also provide some access for visitors with disabilities. National Park Service management policies provide for the paving of trails for the protection of resources, and for the safety and convenience of travelers. Paving bicycle trails mitigates potential damage to trails and adjacent vegetation. With the limited space available in Yosemite Valley, multiple uses of trails must be accommodated to the extent practicable.

513. Public Concern: The National Park Service should implement an aggressive policy to encourage people to stay on trails.

“Implement a more aggressive policy to encourage people to stay on trails, such as boardwalks and railings and more clearly defined trails in general.” (Individual, Arroyo Grande, CA - #1479)

Response: This concern is acknowledged; however it is outside the scope of the *Yosemite Valley Plan*. Operational details such as managing trail users are not relevant to the purpose and need or goals of the *Final Yosemite Valley Plan/SEIS*.

4.13.3.b ~ Bicycle Trails

Bicycle trails are a critical component of Yosemite Valley’s transportation system in the eyes of many respondents. But, according to one person, “traveling in Yosemite National Park is currently a borderline suicidal excursion.” To remedy this, respondents offer suggestions such as implementation of a parkwide bicycle trail system and segregating bicycles from automobiles. One suggestion to accomplish the latter is to establish a Class I bicycle path along Southside Drive. Moreover, “only a trail system segregated from the motorized tyranny provides the safety, aesthetic rewards, disbursed recreation, and interpretive opportunities to make this alternative transportation/recreation tool functional, attractive, and popular,” writes another. Yet, according to at least one respondent, a parkwide trail system is necessarily incomplete unless it provides access routes into Yosemite National Park, not just within the park.

A few people offer specific bicycle trail suggestions. One idea might be to designate nonwilderness trails along the western edge of Yosemite National Park (e.g., the Wawona Road or trails in the Mariposa Grove) for bike access. Another possibility would be to use existing firelines as bike trails, given that such trails are already maintained and that bike-use would arguably cause little, if any, damage.

269. Public Concern: The *Yosemite Valley Plan* should require a parkwide bicycle trail system in Yosemite National Park.

“Traveling in Yosemite National Park by bicycle is currently a borderline suicidal excursion. Busy highways with limited shoulders, no bike lanes, poor visibility, constant curves, and a high incidence of buses and Winnebagos, makes the roads in the Park among the least desirable for cyclists. The only worthy bike trails are limited and very crowded. Cyclists would appreciate and utilize a safe trail system throughout the Park. A Park-wide trails system immediately parallel to the four principle highways will revolutionize access to the Park.” (Individual, Mammoth Lakes, CA - #1443)

Response: A parkwide trail system is outside the scope of the *Yosemite Valley Plan*. However, the Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* does prescribe increasing multi-use paved trails in Yosemite Valley and extending them into the mid-Valley. (Also see responses to concerns #57, 193, and 244.)

267. Public Concern: The *Yosemite Valley Plan* should require that bicycle trails be segregated from vehicles and roads in Yosemite Valley.

“Segregating bicycles from cars and roads is the key to promoting the bicycle as alternative transportation. Only a trail system segregated from the motorized tyranny provides the safety, aesthetic rewards, disbursed recreation, and interpretive opportunities to make this alternative transportation/recreation tool functional, attractive, and popular.” (Individual, Mammoth Lakes, CA - #1443)

Response: Vol. IA, Chapter 2, Alternatives, Visitor Experience—Recreation, describes the trail system proposed in each of the alternatives. In the Preferred Alternative, multi-use paved trails separated from motor vehicle traffic would be provided for bicycle use throughout the east and mid-Valley. Establishing a multi-use paved trail in the west Valley would require substantial modification of the natural environment in the narrowest sections of the Valley and therefore is not proposed in any alternative of the *Final Yosemite Valley Plan/SEIS*.

254. Public Concern: The *Yosemite Valley Plan* should establish a Class I bike path along Southside Drive.

“Construct a separate Class I path on Southside Drive.” (Individual, Los Gatos, CA - #1434)

Response: Alternatives 2, 3, 4, and 5 of the *Final Yosemite Valley Plan/SEIS* address the need to increase bicycling opportunities in the Valley and reduce the risk of conflicts among bicycles, vehicles, pedestrians, and horseback riders. All action alternatives call for the conversion of Northside Drive from Yosemite Lodge to El Capitan crossover (one lane in Alternative 5) to a multi-use paved trail that would be closed to vehicles and the construction of a new multi-use paved trail adjacent to Southside Drive (one lane in Alternative 5) between Swinging Bridge and El Capitan crossover. These designated paved trails would offer safe and convenient bicycle access to the mid-Valley. Visitors would be able to access major Valley attractions and numerous recreational sites without the risk of conflict with Valley traffic.

245. Public Concern: The *Yosemite Valley Plan* should provide adequate bicycle access routes to and within Yosemite National Park.

“Does current planning address how cyclists will access Yosemite Valley or Yosemite National Park? There seems to be only planning to allow for cycling if you are already there. Only the first 550 visitors on a given day will be able to utilize the trails. Having to take a bus with your personal bike to the Valley is a considerable barrier. Park wide access and extensive trails within Yosemite Valley are the solution.” (Individual, Mammoth Lakes, CA - #1443)



Response: Bicycle transportation in the Valley is an important component of the transportation system. The *Final Yosemite Valley Plan/SEIS* alternatives include the expansion of bicycle and pedestrian paths throughout the Valley and the retention of bicycle rentals in the Valley. Alternatives 2, 3, and 4 call for the conversion of Northside Drive to a multi-use paved trail from Yosemite Lodge to El Capitan crossover (one lane in Alternative 5) that would be closed to vehicles. Alternatives 2, 3, and 4 also call for the construction of a new multi-use paved trail adjacent to Southside Drive between Swinging Bridge and El Capitan crossover (one lane between El Capitan crossover and Swinging Bridge in Alternative 5). These paved trails would open up safe and convenient bicycle access to the west Valley. Visitors would be able to access major Valley attractions and numerous recreational sites without conflicting with vehicle traffic. Bicycle parking facilities would be developed as part of the Valley area site design.

The extension of multi-use paved trails outside the Valley and throughout the park is beyond the scope of the *Yosemite Valley Plan*. However, with the implementation of out-of-Valley parking areas, the transport of bicycles aboard the shuttle system from the parking area into the Valley is an important consideration. Out-of-Valley parking shuttle busses would be equipped with bicycle racks. The details of this issue would be examined in the operational plan for out-of-Valley shuttle service and scheduling and in the procurement of shuttle vehicles. The accommodation of bicycles and the potential increases in ridership at certain times of day are operational aspects of service that would be examined in the operational planning phase for shuttle service but are beyond the scope of the *Yosemite Valley Plan*.

244. Public Concern: The National Park Service should consider nonwilderness trails along the western edge of Yosemite National Park for bike use.

“Any unidentified non-wilderness trails along the western edge of the park should be evaluated as bike access. The Wawona Road and trails in the Mariposa Grove offer non-motorized trails with an extraordinary natural history theme. A trail from Badger Pass to Yosemite Valley will be the most expensive and challenging part of the entire trails system. Trail to Glacier point will create a day’s adventure for cyclists based in Badger Pass.” (Individual, Mammoth Lakes, CA - #1443)

Response: This concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan*. Multi-use paved trails outside Yosemite Valley and not associated with out-of-Valley parking are outside the scope of the *Yosemite Valley Plan*. Trails from out-of-Valley parking areas to the Valley were considered in Valley planning, but were not included due to the necessity for a new trail corridor paralleling the existing roads and which would, at frequent intervals, encroach into designated Wilderness. A trail from Glacier Point to Yosemite Valley would require a corridor within the wilderness, where bicycles are prohibited.

690. Public Concern: The *Yosemite Valley Plan* should allow the use of firelines as bike trails.

“I would like to bring up the topic of fire line trails. In other parks, these are used as bike trails. I think this is a good idea for Yosemite. These trails are already maintained by fire crews. Allowing bikes to ride on them would cause no damage to wooded areas, as the trails are already there and clearly marked.” (Individual, No Address - #5774)

Response: This concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan*. Fire lines within Yosemite National Park are rehabilitated after fires and no evidence of those lines is allowed to remain. The National Park Service manages such lands to allow natural processes to prevail.

4.13.4 ~ Bridges

While many respondents suggest that Yosemite Valley bridges be retained or removed based on the bridges’ historical significance and aesthetic qualities (see Section 4.9.2 ~ Historic Bridges), others believe that these values are superseded by what they see as the deleterious effects of

bridges on river hydrology (see Section 4.2.1 ~ Bridges and Hydrology). This section, however, focuses on transportation-related concerns regarding bridge retention, removal, and construction in Yosemite Valley.

Among those commenting on the *Draft Yosemite Valley Plan/SEIS*, widespread support exists for retaining bridges in the Valley. And even if hydrologic problems warrant bridge removal, this should be a last resort, according to many. One U.S. Representative urges the National Park Service to implement and review all traffic management options before the historic bridges are removed. Others go further in requesting the retention of specific bridges, such as Stoneman, Sugar Pine, Housekeeping, and Ahwahnee. The main reasons people give for retaining bridges include their importance for Valley circulation (vehicle and pedestrian) and emergency egress. Both the Bay Bridge and the Gauging Station Bridge, some suggest, need not be retained in their current condition; however, at the very least, they should be rebuilt in the same location, possibly in a more rustic style. Like those who request that bridge removal follow implementation and study of other Valley transportation system changes, one nongovernmental organization argues that “sacrificing one Outstandingly Remarkable Value [historic] in order to preserve another [river ecology] offers no net gain.”

Besides retaining or rebuilding existing bridges, many respondents request the construction of new bridges, mainly to facilitate bicycle and pedestrian travel. Not only should these bridges be built in such a way as to avoid adverse hydrological effects, but they should also be built to accommodate pedestrian needs, such as leaning over a rail “to watch for fish, floating leaves, and water ouzels.” One person suggests that the National Park Service build seasonal bridges for cyclists and pedestrians based on the model of bridges at Jebediah Smith State Park. Two specific locations suggested for pedestrian bridge construction are Happy Isles and the Yosemite Lodge/Yosemite Falls bus parking intersection. The latter, however, consists of a pedestrian highway overpass rather than a stream-spanning bridge.

Finally, several respondents address Yosemite Creek bridges. One person asks the National Park Service to replace the existing Yosemite Creek Bridge near Yosemite Falls parking lot with a more rustic structure akin to those at Happy Isles. Others forcefully argue against any new vehicle bridges over Yosemite Creek, for “the time of bridge building and road construction in Yosemite belongs in the past.”

352. Public Concern: The *Yosemite Valley Plan* should retain Yosemite Valley bridges until all traffic flow issues have been resolved.

“I have seen the potential washout at Stoneman Bridge and share your concern that the abutments for that bridge will wash out in the relatively near term. However, historic bridges should at a minimum be preserved until all traffic flow issues have been completely reviewed in practice to see how they work. Irreversible decisions such as taking out a bridge should not be implemented until traffic flow has been experienced in all types of circumstances, and further public comment on that revised traffic flow has been obtained.” (U.S. Representative, Fresno, CA - #2951)

Response: The historic bridges in Yosemite Valley are considered by the National Park Service as important components of the cultural landscape. Each bridge was evaluated and considered for removal or reconstruction based upon the extent to which it was causing significant damage to the Merced River system, and its importance as a component in the Valley traffic circulation system. In situations where a bridge is necessary, and a historic bridge exists, priority consideration was placed on retaining that bridge. As such, in the Preferred Alternative, Sugar Pine Bridge, which does not carry vehicle traffic, is proposed



to be removed and a monitoring program established. Only after further analysis indicates unacceptable impacts on the Merced River would Stoneman Bridge be removed.

Roadway and bridge changes would be conducted in incremental steps according to a sequencing plan for Valley transportation improvements. The sequencing plan would examine the safest and most efficient method and timing of traffic changes and bridge removals. Removal or replacement of historic bridges would be handled in compliance with the cultural resource requirements and documentation procedures for historic structures.

11. Public Concern: The *Yosemite Valley Plan* should require the retention of bridges in Yosemite Valley.

"I am in favor of restoring Yosemite to a more park-like and less commercial resort type atmosphere. However, I don't want to see the historic bridges removed. For people who enjoy walking they are a means of crossing the river. How would one be able to visit the Chapel or hike up to Yosemite Falls without bridges across the river. Please don't remove them. We need them." (Individual, Portola Valley, CA - #48)

"I do strongly object to removing the Stoneman, Sugar Pine, and Housekeeping Bridges across the Merced River. The Happy Isles foot bridge should be replaced. If an emergency occurs, to get people out of the upper end of Yosemite Valley, the Stoneman bridge and road will be needed. One road is not enough to get people out with their cars and camping gear from the Upper and Lower Pines campgrounds." (Individual, Mariposa, CA - #20271)

"Keep the bridges, if only for us walkers who are too old to continue the extra hike. We can still enjoy the Park and be able to cross the river. We see no reason to demolish these beautiful bridges!" (Individual, Mill Valley, CA - #2350)

STONEMAN BRIDGE

"It appears that there are plans to remove Stoneman Bridge from the Valley. When in the Park we never use our car to get around. We always walk or take the shuttle bus. We are concerned that if the Stoneman Bridge is removed, we will have trouble getting from Curry to the Village and other parts of the Valley. It appears that our only options would be to walk on the Southside Drive, where there is really not much room for pedestrians, or to go all the way around via Happy Isles. Mostly we choose to walk rather than wait for the bus. This plan seems very inconvenient for those of us at Curry. We realize that you are trying to save the river, but wondered if you have considered this impact on those of us at Curry." (Individual, No Address - #30016)

"The removal of Stoneman Bridge would leave only a single vehicle bridge to connect the north and south sides of the river, Sentinel Bridge. We believe that this would have two serious deleterious effects. First, it would result in greater traffic congestion at Sentinel Bridge. Second, it would pose a significant potential safety problem, e.g., if any emergency or disaster impaired or prevented the use of Sentinel Bridge, there would be no vehicle escape route for individuals on the north side of the river. This unfortunate fact could result in the loss of life in the event of a fire or other natural disaster." (Individual, Santa Barbara, CA - #109)

BAY BRIDGE

"I would like to see the Bay Bridge kept at Housekeeping. Now, the bridge doesn't have to be the same one, but it's nice to have the bridges to maintain the bike trails to get across." (Public Hearing, San Jose, CA - #20530)

GAUGING STATION BRIDGE

"Replace the damaged gauging station bridge in the same location with a classic back-country 'parkitecture' style steel beam-supported wooden bridge." (Individual, Lafayette, CA - #4499)

“Sacrificing one ‘Outstandingly Remarkable Value’ in order to preserve another offers no net gain. Without conclusive evidence that the bridges alone have a significant negative affect on the river ecology, and that their removal will significantly improve the river ecology, the National Trust believes that any removal of historic bridges would be premature. We remain adamant that all other ecological restoration actions be implemented and their effects studied before consideration is given to the removal of historic bridges in Yosemite Valley.” (Non-Governmental Organization, San Francisco, CA - #7885)

Response: In the *Final Yosemite Valley Plan/SEIS*, the decisions to retain or remove bridges from Yosemite Valley were based on an analysis of roadway capacities, hydrologic impacts, cultural resource impacts, and biological impacts. Several bridges in Yosemite Valley would be retained or replaced. Specifically, Clark’s, Ahwahnee, Housekeeping, Sentinel, Superintendent’s, El Capitan, and Pohono Bridges would be retained. Happy Isles Bridge and Swinging Bridge would be replaced.

The *Draft Yosemite Valley Plan/SEIS* identified three bridges (including Stoneman Bridge) for removal in the Preferred Alternative due to their severe impacts on Merced River hydrologic processes. In response to public comments, the *Final Yosemite Valley Plan/SEIS* proposes, instead, a phased approach to bridge removal. Sugar Pine Bridge, which is causing the most significant ecological degradation would be removed first. Stoneman Bridge would be removed only if the removal of Sugar Pine Bridge does not restore natural river dynamics to the river to a sufficient degree. If Stoneman Bridge remains, it would continue to provide a multi-use trail link between Curry Village and Yosemite Village. If removed, the inconvenience to many visitors that would be caused by rerouting the trail would be offset by their enhanced experience of a river restored to a more free-flowing character.

The bridges that would be retained provide the required capacity for vehicle traffic without causing unacceptable traffic congestion. In addition, enough pedestrian bridges would remain to provide access to the two sides of the Merced River for foot and bicycle traffic, as well as vista points for viewing and photographing the majestic scenery of Yosemite Valley. Sentinel and Ahwahnee Bridges would provide access for pedestrians and bicyclists between Curry Village and Yosemite Village. Also, Housekeeping Bridge would be retained to provide additional pedestrian access across the stretch of the Merced River between those two larger bridges. The damaged bridge at Happy Isles would be replaced with a new bridge in the same location. Although the style of construction would be determined during the site design process, the bridge would be designed to harmonize with the existing architectural styles in Yosemite Valley. In the event of an emergency, there is sufficient capacity on Southside Drive to handle an evacuation from the east end of the Valley. Also, if Sentinel Bridge is not accessible, emergency vehicles as well as evacuating visitors and employees can travel on the proposed multi-use paved trail where Northside Drive is currently located.

In the *Merced River Plan/FEIS*, management zoning does allow for bridge crossings of the river where necessary for access, improved circulation, safety, and resource protection. The historic bridges, collectively, are also part of the outstandingly remarkable cultural resource values of the Merced Wild and Scenic River. However, the River Protection Overlay protects the river channel and its immediate surroundings from future development, and encourages removal of facilities such as bridge abutments or riprap that affect the free flow of the river or have direct and adverse impact on other Outstandingly Remarkable Values.

(Also see response to concerns #12 and #753.)

479. Public Concern: The *Yosemite Valley Plan* should retain Ahwahnee Bridge as an automobile route between Lower Pines and Rivers campgrounds.

“The YVP preferred alternative calls for the retention of Ahwahnee Bridge for a multi-use path. I suspect this path linked to the Ahwahnee road will be used for a secondary emergency access to the Curry Village and campground areas so it will have to accommodate fire trucks and snowplows and will probably have to accommodate two-way traffic for evacuation and emergency responses. If this is the case, then why not just make it a road from the



proposed campground entrance through the Lower Pines area across Ahwahnee Bridge to Rivers Campground? The redevelopment of Rivers Campground is proposed in Alternative 5 but this routing traffic is not proposed. By routing traffic to Rivers Campground over Ahwahnee Bridge, the campground could be developed to accommodate visitor enjoyment and resource improvements could also be implemented. The Ahwahnee meadow could be restored without a road and the campsites within the River Protection Overlay could be eliminated and this area restored. The Rivers Campground should be redeveloped with the Ahwahnee Bridge as the access route in order to meet the GMP goal for number of campsites in Yosemite Valley.” (National Park Service Employee, Mariposa, CA - #6240)

Response: The *Final Yosemite Valley Plan/SEIS* calls for the removal of Sugar Pine Bridge and, if necessary to restore natural river processes, Stoneman Bridge. The Preferred Alternative also calls for the construction of a multi-use paved trail connecting the Lower Pines area to the Upper and Lower River Campgrounds. This multi-use paved trail would cross over the Ahwahnee Bridge and replace vehicle uses on the existing roadway with recreational and pedestrian uses.

Based on traffic flow analysis for the Valley, existing roadways in the east Valley would provide sufficient capacity to the campground areas and no new vehicle access would be needed in the area. The multi-use paved trail connecting Lower Pines to the Upper and Lower River Campgrounds would provide access for nonvehicle uses. The *Final Yosemite Valley Plan/SEIS* also calls for the removal of roads through Stoneman and Ahwahnee Meadows and the restoration of these meadows.

682. Public Concern: The National Park Service should replace river-constricting automobile bridges with pedestrian suspension bridges in Yosemite Valley.

“Consider replacing river-constricting automobile bridges with pedestrian suspension bridges. We want to increase visitors’ ability to savor and learn about this special place, and one of the best ways is on foot or by bicycle. While I do agree that poorly planned bridges need to be removed to restore natural river systems, the access impacts to Yosemite’s hiking trail system are considerable. Has the NPS researched alternative bridge construction designs that would not constrict or hinder the river’s natural flow?” (Individual, El Portal, CA - #9013)

Response: As discussed in the water resources section of Vol. IA, Chapter 3, Affected Environment, of the *Final Yosemite Valley Plan/SEIS*, bridges can affect river flow by narrowing the channel and causing scour and upstream flooding to occur. Any bridges, whether vehicle, pedestrian, or bicycle, constructed in Yosemite Valley would be designed to avoid impacts to the free-flowing condition of the Merced Wild and Scenic River and to the river’s Outstandingly Remarkable Values.

The *Draft Yosemite Valley Plan/SEIS* identified three bridges (including Stoneman Bridge) for removal in the Preferred Alternative due to their severe impacts on Merced River hydrologic processes. In response to public comments, the *Final Yosemite Valley Plan/SEIS* proposes, instead, a phased approach to bridge removal. Sugar Pine Bridge, which is causing the most significant ecological degradation would be removed first. Stoneman Bridge would be removed if the removal of Sugar Pine Bridge does not restore natural river dynamics to the river to a sufficient degree. If Stoneman Bridge remains, it would continue to provide a multi-use trail link between Curry Village and Yosemite Village. If removed, the inconvenience to many visitors that would be caused by rerouting the trail would be offset by their enhanced experience of a river restored to a more free-flowing character.

Suspension bridges have been used in Yosemite Valley: Swinging Bridge was originally a suspension bridge. However, suspension bridges require abutments that can interfere with the free-flowing condition of the river, and long spans require tall towers which may have an impact on scenic vistas. The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* decreases the amount of vehicle roadways in Yosemite Valley thereby increasing the portion of Yosemite Valley that can be accessed on foot or bicycle without the sight, sound, and emissions from vehicles. Additionally, the Preferred Alternative also improves and extends the system of multi-use paved trails throughout the Valley.

308. Public Concern: The *Yosemite Valley Plan* should ensure that new bridges accommodate pedestrians.

“Bridge Design: Given that any new bridge in the Valley floor must be designed primarily to accommodate flood waters and not adversely impact the environment of the river scope, it is important that thought must be given to the experience of pedestrians. Design so that an adult can easily lean on the parapet and a child can step on a ledge so as also be able to lean on the top—in that way being able to watch for fish, floating leaves, and water ouzels.” (Individual, La Mesa, CA - # 1314)

Response: When new bridges are constructed in Yosemite Valley, they would be designed to accommodate both pedestrian and vehicle traffic (when both are appropriate uses) and in accordance with safety and accessibility standards, and within those standards to accommodate optimum pedestrian experiences. Exact design specifications are outside the scope of the *Yosemite Valley Plan*, but this concern would be considered during subsequent design activities.

573. Public Concern: The *Yosemite Valley Plan* should require construction of seasonal bridges for hikers and bicyclists in Yosemite Valley.

“Traffic along the highways is the big problem and though there are bike trails, the vehicles, bikes, and hikers all cross the river by the same bridges. Would it be possible to install seasonal bridges for the hikers and bikers and thus keep them from competing with the autos when crossing the river. Jebediah Smith State Park in Del Norte County uses seasonal bridges quite successfully.” (Individual, Redding, CA - #487)

Response: Planning for Yosemite Valley has for the most part looked at removing bridges in Yosemite Valley west of the Happy Isles area. New seasonal bridges would be required to be completely out of the Merced River, particularly during the very busy spring season when river runoff levels are high. Therefore, bridges of the length required to cross the Merced River would be both costly and difficult to install and remove. The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* has been revised to allow for the retention of Housekeeping Bridge, which would reduce bicycling and pedestrian demand on Sentinel Bridge. Vehicle traffic reductions would also reduce conflicts on Sentinel Bridge.

519. Public Concern: The *Yosemite Valley Plan* should require the construction of a footbridge at Happy Isles.

“The construction of a footbridge at Happy Isles to provide direct access to John Muir Trail and Mist Trail is a must for any Yosemite Valley Plan adopted.” (Individual, No Address - #6998)

Response: The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* (see Vol. IA, Chapter 2, Alternatives, Visitor Experience—Recreation—Trail Use) proposes to replace the Happy Isles Bridge, which was damaged by rockfall and flood. It would be replaced with an appropriately constructed (so as not to impede stream flow) pedestrian bridge in order to maintain historic trailhead access and to provide an alternative for pedestrians to the vehicle bridge on the shuttle bus road further downstream.

679. Public Concern: The *Yosemite Valley Plan* should require the construction of a pedestrian overpass at the Yosemite Lodge/Yosemite Falls bus parking intersection.

“Construct a pedestrian overpass/overcrossing at the Yosemite Lodge/Yosemite Falls bus parking intersection.” (Individual, Pasadena, CA - #5618)

Response: Improvements are planned for the Yosemite Falls and Yosemite Lodge area. Conceptual plans for Yosemite Falls include improved pedestrian circulation in an effort to minimize conflicts between pedestrians and vehicles. The section of Northside Drive that runs between the Yosemite Falls parking lot and Yosemite Lodge would be rerouted to the south of Yosemite Lodge, in part to eliminate such conflicts. Commercial tour bus loading, unloading, and parking would also be moved out of the Yosemite



Falls area and moved to Yosemite Village. The parking lot at Yosemite Falls would be removed and the area restored to natural vegetation with an interpretive site added. By removing the parking lot and road through this area, an overpass would not be necessary. If the road were to remain, an overpass would not be appropriate because of adverse visual and aesthetic impacts.

681. Public Concern: The National Park Service should replace the current Yosemite Creek Bridge near Yosemite Falls parking lot with a more rustic structure.

“Please replace that abomination of a glue-lam foot-bridge over Yosemite Creek at the east end of the Yosemite Falls parking lot with a more rustic one, like those at Happy Isles.” (Individual, Oakland, CA - #7749)

Response: The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* calls for the removal of the existing pedestrian bridge at Yosemite Creek and the conversion of the adjacent historic vehicle bridge to a multi-purpose paved trail. A new bridge would be constructed downstream for vehicular access to the realigned access road at Yosemite Lodge.

(Also see response to concerns #102 and #160.)

102. Public Concern: The *Yosemite Valley Plan* should not implement the Yosemite Creek Bridge Project.

“This [Yosemite Creek Bridge Project] is a major engineering construction project, similar to the Sentinel Bridge project, that could last several years. The bridge would have to be of sufficient length and height to prevent hydrologic alteration of Yosemite Creek, and to withstand future floods. It would have to withstand multiple heavy loads, such as large diesel buses and heavy commercial trucking. Its construction would cause a major disruption in the Yosemite Lodge area. . . This project would be located within an area defined as a Highly Valued Resource. The sensitive and beautiful oak and fern forest area just south of Yosemite Creek is one of the unique scenic treasures of Yosemite National Park. This project should not take place, and the area [should be] left undisturbed. The time of bridge building and road construction in Yosemite belongs in the past.” (Individual, Los Angeles, CA - #470)

“If Northside Drive is a dead end, why is NPS adding a new vehicle bridge at Yosemite Creek? The traffic there will be greatly reduced since only shuttle buses and Yosemite Lodge guests should be driving across it. In my mind, the cost outweighs the benefits of building this new bridge. There appear to be three bridges in a 50-yard section of Yosemite Creek.” (Individual, Fresno, CA - #20511)

Response: The proposed bridge over Yosemite Creek would be designed to accommodate large vehicles without disrupting the flows of Yosemite Creek. The construction of the new bridge would be coordinated with the proposed relocation of Northside Drive, the rehabilitation of the Yosemite Falls area, and redevelopment of Yosemite Lodge. Construction would be staged so as to minimize disruption. Upon completion of the proposed roadway bridge, the existing bridge would be converted to pedestrian use and the wooden pedestrian bridge would be removed. The use of the historic Yosemite Creek Bridge for nonmotorized travel would greatly enhance visitor experience and the removal of the existing wooden bridge greatly enhance the view of Yosemite Creek bridge from the north. The net effect of the projects would be to restore natural hydraulic processes along the creek.

During design, removal, and construction, every effort would be made to minimize impacts to and improve conditions for the black oak woodland.

(Also see response to concern #160.)

4.13.5 ~ Parking

Parking is one of the most frequently addressed transportation topics by respondents. This section includes public concerns covering general parking management and proposals for parking facilities both within and outside Yosemite Valley. The reader should note that all out-of-park parking concerns are included in the out-of-Valley section (4.13.5.c) since many respondents blur the distinction between in-park and out-of-park parking.

4.13.5.a ~ General Management Direction

The constellation of general parking management comments can be distilled into either non site-specific or user group specific concerns. Regarding non-site specific concerns, respondents offer a number of broad suggestions. Some individuals advise caution when it comes to removing or modifying parking infrastructure. “It is vital that existing parking not be removed nor existing roads converted to other uses until replacement parking and transportation systems are in place and ready to operate,” writes one person. Part of being cautious, according to some, requires that the National Park Service explain how satellite (out-of-Valley) parking lots will replace in-Valley lots or what management strategies will be used for times when Yosemite Valley parking lots reach capacity (e.g., whether or not cars will be turned away at traffic check stations). Others question the adequacy of the National Park Service’s analysis of environmental impacts of idling vehicles waiting to enter the Valley. “Lines of idling vehicles at the traffic check points are no better than the current lines of idling vehicles seeking day-visitor spaces deeper in the Valley,” writes one individual. Whether referencing existing or proposed parking lots, a number of people request that the National Park Service develop design standards that make them less obtrusive in the Valley. Proposals include painting pavement green, planting trees that obscure lots from Valley overlooks, or following the design principles outlined in the 1994 *Draft Yosemite Valley Implementation Plan*. For some, however, nothing short of a complete ban on new parking lots in Yosemite National Park will suffice. The parking lots are essentially a blight on a work of art that no amount of landscaping will remedy. In the words of one respondent, “Would you spit on Renoir?”

Some individuals offer parking proposals for specific user groups. One civic organization suggests that a Yosemite Institute parking area be established at Crane Flat, or some other location, rather than moving the entire camp. And speaking on behalf of those who ride motorcycles, one person at a public hearing asks the park service to designate special motorcycle parking spaces.

364. Public Concern: The National Park Service should not remove or modify existing roads and parking until new transportation infrastructure is in place.

“It is vital that existing parking not be removed nor existing roads converted to other uses until replacement parking and transportation systems are in place and ready to operate. The implementation schedule should be expanded and the removal of existing systems (particularly as involves transportation) be made contingent upon completion of replacement systems.” (Business, Yosemite National Park, CA - #3962)

Response: Roadway, parking, transit center, and bridge changes will be conducted in incremental steps according to a sequencing plan for Valley transportation improvements. (See Vol. II, Appendix M of the *Final Yosemite Valley Plan/SEIS*). The sequencing plan will examine the safest and most efficient methods and timing of changes to minimize the impacts to Valley visitors and park resources.

687. Public Concern: The *Yosemite Valley Plan* should assure that out-of-Valley parking will permanently replace in-Valley parking.

“Satellite parking: While I support this concept the final NPS document needs to outlined in detail how NPS will assure out-of-Valley parking will truly replace in-Valley parking rather than add to it. If NPS closes some parking areas in the Valley because it has opened new parking areas out of the Valley, how will it guarantee pressure to allow more people in and reopen those closed parking areas? Assure that new out-of-Valley satellite parking lots do not themselves lead to a lot of new, additional development and more profit centers (of which there are too many now). Such specific assurances are badly needed in the final plan if the public interest is to be well served.” (Individual, San Francisco, CA - #7154)



Response: Out-of-Valley parking is proposed in the *Final Yosemite Valley Plan/SEIS* to accomplish the goal of reducing congestion in Yosemite Valley. To not remove in-Valley parking after the development of out-of-Valley parking would be inconsistent with this goal, and thereby inconsistent with the purpose of the *Yosemite Valley Plan*. Out-of-Valley parking is intended to permanently replace parking removed from Yosemite Valley.

Additionally, the *Final Yosemite Valley Plan/SEIS* Preferred Alternative proposes to reduce vehicle traffic in the Valley to afford visitors a more nature-oriented experience that is less affected by motorized vehicles. Parking in the Valley would be reduced and relocated to a single lot, sufficient to accommodate Valley visitors during the months from November to March. Out-of-Valley shuttles would not operate during these months. Eliminating all in-Valley parking was considered but determined to be infeasible (see Vol. IA, Chapter 2, Alternatives, Alternatives Considered But Dismissed). Out-of-Valley parking lots would be designed to supplement Valley parking during the busier summer season. Shuttle service to out-of-Valley parking lots would start in April and continue through the peak summer visitation months. Out-of-Valley parking would not eliminate Valley parking, but would supplement the reduced level of Valley parking proposed under the *Yosemite Valley Plan*.

The sequencing plan (see Vol. II, Appendix M) outlines the sequence of actions to occur over a period of years. Projects would be accomplished sequentially according to the physical links between developing replacement facilities outside Yosemite Valley, relocating functions, rehabilitating or removing structures, and redeveloping and restoring areas to natural conditions.

604. Public Concern: The *Yosemite Valley Plan* should address traffic management strategies for times when Yosemite Valley parking lots reach capacity.

“The SEIS fails to address the way visitors will be handled when in-Valley day-use lots near capacity. Turning cars around in the Valley is unacceptable. Visitors should not drive into the Valley before being directed to the Out-of-Valley lots (Alternatives 2, 4,5) or being told no parking is available (Alternative 3). Lines of idling vehicles at the traffic check points are no better than the current lines of idling vehicles seeking day use spaces deeper in the Valley. That method of traffic management has avoidable impacts on air quality, water quality, energy consumption, etc.” (Individual, Union City, CA - #4404)

Response: In Vol. IA, Chapter 2, Alternatives, Actions Common to All Action Alternatives, the *Final Yosemite Valley Plan/SEIS* addresses this issue. A traveler information and traffic management system would be developed to provide current information on parking availability. Visitors would be informed at the park entrance gates regarding where parking is available. This system would be designed before the parking reductions occur in Yosemite Valley, and that design would include a public involvement process. Although the details of this system have not been developed, an important element of it would be to prevent visitors from having to be directed to out-of-Valley parking after having already driven to Yosemite Valley.

161. Public Concern: The *Yosemite Valley Plan* should specify design requirements for proposed parking facilities both inside and outside of Yosemite Valley.

“Alternative 2 provides for four new parking areas, three outside of and one within the Valley. While the YVP offers detailed treatments of the location and amount of parking, it is silent on important considerations of design quality. . . The 1997 Draft Yosemite Valley Implementation Plan offers good advice for any parking area that does in fact need to be built (page 43). . . These design principles should be written into the plan to apply to all four parking areas.” (Individual, Oberlin, OH - #580)

“The Curry parking lot is one of the most visible landmarks from Glacier Point, but is going to be left in place for obvious reasons: its use for Curry lodgers and the new location for the ice rink. Therefore it is important to improve its looks, which at first, sounds silly, but is really possible, practical, relatively simple, and necessary. First, the lot should be repaved, along with the south side pedestrian walkway, which is long overdue. It should then be painted

green so as to blend in with the Stoneman Meadow green. The parking stripes would be painted a darker color green. This would not only improve its looks, but it would be cooler in the summer which would be an added plus. It would also be less noticeable, if not invisible, from Glacier Point. Second, the first row of parked cars running east/west along the north side of the lot should be placed as close under the apple trees as possible so as to be hidden from above. The double row of cars in the center of the lot should have a closely spaced row of local shade trees planted between them. Again, this would make the cars less visible. The single row of cars along the south side of the lot should also have a row of closely spaced local shade trees planted along the front bumper line, making the cars less visible. What an improvement this would make, and it is relatively inexpensive.” (Individual, American Canyon, CA - #907)

Response: The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* establishes land-use changes in Yosemite Valley and in areas where facilities for use by Valley visitors are proposed. The Preferred Alternative also establishes general concepts for parking, shuttle services, and other operating systems and facilities that would serve visitors to Yosemite Valley. It does not determine or prescribe detailed designs, including design standards for facilities. These elements would be developed in subsequent site planning and design projects.

557. Public Concern: The *Yosemite Valley Plan* should prohibit the construction of parking lots in Yosemite National Park.

“I do not want parking lots in Yosemite Valley, nor elsewhere in Yosemite National Park, especially at Yosemite Village! Would you spit on Renoir?” (Individual, Los Angeles, CA - #96)

Response: At this time there is not a feasible alternative to providing visitor access to Yosemite National Park and to accomplishing the five goals of the *General Management Plan* without providing some parking facilities. The *Final Yosemite Valley Plan/SEIS* recognizes the impacts of parking lots on both the landscape and visitor experience. It therefore calls for the removal of facilities, particularly those that have the greatest impact to natural and cultural resources. The *Final Yosemite Valley Plan/SEIS* considered but dismissed an alternative that would remove all private vehicles from Yosemite Valley, thereby eliminating the need for the construction of parking facilities. Providing all parking for day visitors to Yosemite Valley in locations outside the Valley and providing out-of-Valley parking for overnight visitors was also considered but dismissed. Serving all day visitors with shuttles from remote locations would require a very large fleet of buses, large parking areas outside the Valley, and year-round operation of the shuttle bus system. The roads leading to the Valley from the north and the south traverse high elevations that are subject to heavy snows in the winter. Operating shuttle buses on these routes in the winter and keeping parking areas cleared of snow would be difficult and expensive. Weather conditions in the winter would make waiting for shuttle buses uncomfortable. (See Vol. IA, Chapter 2, Alternatives, Alternatives Considered but Dismissed.) The number of parking spaces provided in the Valley for day visitors is adequate to serve all day users from November through March, when the heaviest snows occur. Day visitors in the peak season would use the parking provided in the Valley for day users in the winter, along with out-of-Valley parking.

602. Public Concern: The National Park Service should build a parking lot for Yosemite Institute attendees rather than relocating their facilities.

“I have one suggestion that I wish you would consider. In an effort to reduce traffic related to YI, rather than moving the entire camp and facilities, couldn’t a parking area at Crane Flat or another area be established for the attendees of YI? That area could be secured with a perimeter fence. It could remain dirt, less impact on the environment. A shuttle service could provide transportation to and from the vehicles.” (Civic Organization, Citrus Heights, CA - #1358)

Response: The Yosemite Institute’s Crane Flat facility is not considered in the *Yosemite Valley Plan*. However, their administrative office, which is located in Yosemite Valley, is proposed for relocation from the Valley, similar to administrative offices of the National Park Service and other park partners. The



Yosemite Institute would still be able to maintain a field office, associated with the National Park Service's Valley district interpretation facilities in Yosemite Village.

258. Public Concern: The *Yosemite Valley Plan* should designate more parking spaces for motorcycles.

"I would like to see more designated motorcycle parking spaces; since there are none at this point time, we take up a full car space." (Public Hearing, Merced, CA - #20104)

Response: The *Final Yosemite Valley Plan/SEIS* recommends general changes in the number of parking spaces and the location of those spaces both in and out-of-the Valley. The specific parking configuration in the recommended locations, however, is beyond the scope of this plan and will be addressed in subsequent parking site plans for the Valley.

4.13.5.b ~ In-Valley Parking

Comments pertaining to Yosemite Valley parking fall into five general categories: clarification and analysis, retention of existing parking facilities, construction of new parking facilities, limitations on parking, and prohibitions on parking facility construction. Although for the purposes of this analysis explicit references to transfer facilities are treated separately from other parking facilities, there is overlap. Hence, parking facility concerns should be viewed as the more general of the two since they encompass all parking lots not otherwise denoted as transfer facilities or in the location of proposed transfer facilities.

A number of people request that the National Park Service clarify plans for in-Valley parking. One person asks for clarification of whether or not west Valley day-visitor parking will be eliminated under the Preferred Alternative. Other respondents, though, feel that the *Draft Yosemite Valley Plan/SEIS* does a poor job of explaining why parking lots are proposed for elimination in Yosemite Valley: "The problem solving here reminds me that a camel is a horse designed by a committee," writes one individual. Similarly, a few respondents, skeptical of *Yosemite Valley Plan* estimates, ask the National Park Service to re-evaluate the adequacy of proposed day-visitor parking. They offer their own minimum levels of parking such as 1,000 or 1,600 spaces.

Eliminating parking to reduce congestion is "a very draconian measure to take for a situation that appears a couple of times in the summer," according to one person. This sentiment is shared by many others who see no good reason to reduce the number of parking spaces in the Valley. Some suggest that the root of the problem with the National Park Service's analysis is basing summer day use on peak winter use. One way to avoid this problem during peak seasons and times, states another, might be to require vehicles, once parked, to remain at lots (also see Section 4.13.7 for related public concerns on seasonality and transportation). Many people note specific types of parking, or locations of existing parking lots, they would like retained in the Valley. For instance, one conservation organization feels that it is simply inefficient to trade dispersed parking for concentrated parking, with the end result being fewer parking spaces. For others, roadside parking should be retained in the Valley to enhance visitor experience and reduce congestion. This is especially important to many climbers who feel they need the flexibility afforded by parking near the base of their climbs. Without this option, one climber asserts, "many long climbs in the park will become impossible without greatly increasing the risk of becoming stranded by dark." Finally, Curry Orchard is yet another area where some respondents believe parking should be retained.

Far from simply preserving existing parking opportunities, many others offer suggestions for new parking facility sites throughout Yosemite Valley, including the following sites:

- Camp 6
- Ice Rink area
- National Park Service Stable area
- Camp Curry
- Camp 7 and 15
- Lower River Campground
- Trailheads

Among those who propose new parking lots in the Valley, some individuals specifically request construction of public transportation transfer facilities. Respondents mention three locations: Taft Toe, Yosemite Village, and the Bridalveil Falls area. A few people who advocate the Bridalveil location take exception with claims that such a facility might negatively impact scenic views. Landscaping, they claim, could ameliorate such impacts.

Others outline general proposals for new parking facilities in the Valley. These include providing more spaces for disabled visitors, constructing high-density San Francisco-style valet parking facilities, and constructing Los Angeles-style underground lots. Both valet-style parking and underground lots are intended to eliminate the need for a more costly out-of-Valley shuttle system. However, instead of building new lots, one respondent outlines a parking space reservation system that assigns visitors a specific space where their vehicle must remain until exiting the park. “From [their] time of arrival they must use public transportation, hike, bike . . . etc.”

Contrary to those who believe additional parking facilities should be built in Yosemite Valley, many others request strict limitations on parking, including both programmatic goals and site-specific requests. On a programmatic level, people suggest various proposals: “consolidation and eventual elimination of in-Valley parking,” prohibition of constructing new permanent lots, restriction of parking to recognized areas within the park, and prohibition of siting new parking facilities in previously undeveloped areas. To minimize negative environmental impacts and increase visitor convenience, a number of respondents suggest that the *Yosemite Valley Plan* emphasize the use of small, unobtrusive parking lots throughout Yosemite Valley. In the words of one person, “turning huge meadows into asphalt parking lots . . . is far more ruinous of the environment than small parking lots nestled among the trees.”

Respondents mention several areas where parking should either be prohibited or eliminated, including Taft Toe, Yosemite Village, and Camp 6. Though calls for the prohibition of new facilities or removal of existing parking at these sites are often founded upon ecological reasons, one person states that “the amount of noise, excitement, hubub, and commotion [at Yosemite Village] would far exceed anything known before. . . It is not Grand Central Station, nor should the ambience of one be created here.” And one conservation organization calls for the National Park Service to include criteria for eliminating parking at Camp 6 in its Record of Decision for the *Yosemite Valley Plan*. To this end, the group writes, “the NPS could commit to closing Camp 6 (and restoring the area) as soon as the satellite parking lots are in use and YARTS is operating at full capacity.”



613. Public Concern: The *Yosemite Valley Plan* should clarify whether current west Valley day-visitor parking will be eliminated under the Preferred Alternative.

“At present there are 654-758 parking spaces for day users along the west Valley, says the EIS. Will this area be off limits to parking under the Preferred Alternative?” (Individual, Carmichael, CA - #30006)

Response: The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* calls for limited parking in the east end of Yosemite Valley. The number of parking spaces would be reduced and parking would be located to allow the restoration of highly valued resources. Visitors traveling to the east Valley in private vehicles would be directed to parking areas at their overnight accommodations or at the designated day-visitor parking area. Once visitors park, they would travel by shuttle or by nonmotorized means to other Valley destinations. No parking would be provided at individual destinations to discourage travel in the Valley by private vehicles. The Preferred Alternative proposes to locate all day-visitor parking in the east Valley in a single parking lot near the Camp 6 area. Roadside parking would continue to be available in the west Valley for safety reasons and to provide short-term access to historic viewpoints. To accomplish the goals of the Preferred Alternative of the *Final Yosemite Valley Plan/SEIS*, long-term roadside parking would be discouraged or prohibited and replaced with improved Valley-wide shuttle access.

103. Public Concern: The *Yosemite Valley Plan* should clarify the rationale for eliminating parking lots in Yosemite Valley.

“I saw the parking lot in front of the post office/visitor center/Village store area eliminated. Evidently the parking at Mirror Lake has been eliminated. Evidently the parking at Curry Village is to be eliminated. Why, when there really isn’t a traffic problem . . . ? The problem solving here reminds me that a camel is a horse designed by a committee. . . Does it make sense to reduce the parking to a 500 car lot at Camp 6 and then create three huge staging areas at Badger Pass, Crane Flat and El Portal? (Individual, Ahwahnee, CA - #329)

Response: Parking lots have been removed in the past as actions to implement the *General Management Plan* and to solve localized existing congestion problems. Parking at Mirror Lake was removed as part of an action to remove private vehicle traffic from the Happy Isles Loop Road and the road to Mirror Lake. Automobile access was replaced by access on Valley shuttle buses (visitors with disabilities and an approved placard can still access Mirror Lake in a private vehicle). The demand for parking at Mirror Lake was far greater than the number of parking spaces. As a result, vehicles were parked along the roadside on the Happy Isles Loop Road and vehicle traffic was increased by visitors looking for parking. By doing away with private vehicle access and providing shuttle service, the visitor experience has been improved, and traffic congestion in the Mirror Lake and Happy Isles Loop area has been eliminated. Parking was removed from the front of the post office and visitor center to provide a pedestrian-oriented experience in the core of Yosemite Village and to allow restoration of oak woodland habitat. The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* proposes to further reduce parking in Yosemite Valley to help achieve the goals of the *General Management Plan* as outlined in Vol. IA, Chapter 1, Purpose and Need. The number of parking spaces would be reduced to allow the restoration of highly valued resources.

The *Yosemite Valley Plan* proposes to remove day-visitor parking from the Curry Orchard and expand parking in the Yosemite Village area. The specific location and design of the parking area near Yosemite Village would be determined in subsequent design activities. The location near Yosemite Village would be more convenient for day visitors, since it would be within walking distance of the Visitor Center and other visitor support facilities. Visitors would have easier access to information on activities in the Valley and they would be able to board shuttle buses to all destinations in the Valley. The parking location in Yosemite Village would significantly reduce the distance driven in the Valley by day visitors, resulting in lower vehicle emissions and in less noise from private vehicle traffic.

The proposed improvements to parking and the implementation of a traveler information and traffic management system would reduce recurring problems with traffic congestion in Yosemite Village and at Yosemite Lodge.

242. Public Concern: The *Yosemite Valley Plan* should re-evaluate the amount of day-visitor parking available in Yosemite Valley.

“If the total amount of overnight visitors is being reduced, why can’t the number of day users be increased? The 18241 limit of the 1980 GMP was based on the number of parking spots available. However, if there are less overnights and employees parking, then that would free up parking for day users, so there would be parking for many more than 550-800 day use cars. If more day users take the bus, then they are not limited by number of parking spaces, and the justification for the 18241 limit no longer exists.” (Individual, San Diego, CA - #3479)

“Maintain at least 1,000 parking places in the Valley.” (Individual, Oakhurst, CA - #129)

“We also request that day-use parking spots be continued to a minimum of 1,600 spaces and employee parking be in addition to and separate from the public parking spots.” (Individual, Oakhurst, CA - #6157)

Response: The *Final Yosemite Valley Plan/SEIS* alternatives would provide parking to support varying levels of day-visitor use. Alternatives with less overnight accommodations would provide more day-visitor parking. The plan does not propose limits on total visitation.

To accomplish the five broad goals of the *General Management Plan*, the *Final Yosemite Valley Plan/SEIS* proposes to reduce parking in Yosemite Valley, thereby reducing traffic congestion and allowing the restoration of highly valued resources. This document recognizes that for the foreseeable future, parking will continue to be needed in Yosemite Valley but could be reduced and relocated to diminish its impacts. The alternatives in the *Final Yosemite Valley Plan/SEIS* would provide a range in the number of day-visitor parking spaces in the Valley with additional parking for day visitors at out-of-Valley locations, where needed. The Preferred Alternative would provide 550 day-visitor parking spaces in the Valley.

8. Public Concern: The *Yosemite Valley Plan* should not reduce the number of parking spaces in Yosemite Valley.

“I am writing this letter to voice my opposition to the recently unveiled Yosemite Management Plan. Although a flexible secondary transportation system into the Park would be desirable for high volume days, removing so many parking spaces from the Valley floor and essentially markedly reducing car traffic seems a very draconian measure to take for a situation that appears a couple of times in the summer. This measure will markedly reduce access to the Park for daytime users such as photographers and rock climbers, who use their cars to traverse the valley floor.” (Individual, Camarillo, CA - #9)

“I am against reducing the day-use parking in the Valley to only 550 cars, less than 10% of the original parking that was dispersed throughout the Valley.” (Individual, Somis, CA - #1808)

“I have serious concerns regarding the proposed number of parking spaces at Yosemite Valley that would be eliminated under the preferred alternative. Like you, I agree that at times Yosemite Valley experiences severe traffic congestion. Such congestion is neither good for the Park, nor the visitor. However, it is my understanding that congestion of this nature only exists a few days a year. While it is clear that for those days a different, more efficient transportation management strategy is needed. I believe that permanently reducing the number of parking spaces to 550 would only result in unnecessarily hampering the ease of visitation for many day-use travelers during times of the year in which visitation does not result in traffic congestion.” (U.S. Representative, Washington, DC - #4292)

“Please leave the amount of parking spaces that are in place now, less causes more gridlock. I can’t think of anyone wanting to drive all the way to Badger Pass to get on a bus to then go down to the Valley. Wouldn’t it be better to park in a large designated lot or structure in the Valley floor and be shuttled around on electric trams? Some parking



lots are still needed as the traffic is only bad a few days out of the year. On those days travelers could be notified by the signs in Mariposa and Oakhurst.” (Individual, Bass Lake, CA - #54)

Response: The alternatives considered in the *Draft Yosemite Valley Plan/SEIS* were developed in part to implement the *General Management Plan* goal of reducing traffic and its related congestion.

The *Final Yosemite Valley Plan/SEIS* Preferred Alternative does call for a reduction in day-visitor parking spaces and consolidation of day-visitor parking into a single parking lot in Yosemite Valley. However, this reduction of in-Valley parking and the related plans for out-of-Valley parking and shuttles, restoration, and visitor information are designed to render great improvements both in visitor experience and in ecological restoration. Given the popularity of Yosemite Valley, these efforts would help the National Park Service move toward the ultimate goal of freeing the Valley from the environmental and experiential degradation caused by thousands of vehicles, and facilitating nonmotorized modes of transportation around the Valley.

The reduction in parking in Yosemite Valley would allow portions of Northside Drive to be closed to traffic and converted to a multi-use paved trail. Northside Drive from Stoneman Bridge to Yosemite Village would be removed to restore the natural flow of ground water and surface water between the Merced River and the Ahwahnee Meadow. Northside Drive would be closed to vehicle traffic between Yosemite Lodge and the El Capitan crossover, and would be converted to a multi-use paved trail. Removing traffic from these parts of the Valley would offer visitors safe areas for biking and would provide large areas of the Valley near the Merced River that would be unaffected by the sight, sound, and exhaust of vehicles. Removing day-visitor parking spaces would reduce traffic congestion which is consistent with the goals of the 1980 *General Management Plan*.

To ensure access, the *Final Yosemite Valley Plan/SEIS* would greatly expand shuttle bus service. Photographers, rock climbers, and general visitors undertaking other activities would be able to travel throughout the Valley via shuttle buses.

566. Public Concern: The *Yosemite Valley Plan* should not base day-visitor parking levels on peak winter use.

“The day-visitor parking premise in alternatives 2 and 4 are an unbelievable leap of logic. It is fundamental error to use ‘the number of day-visitor vehicles that enter the Valley on a peak winter day to establish the number of 550 for peak summer day-use, because at peak winter season there is no need for out of Valley visitor parking in wintertime.’ This is maladroitness at its worst. The NPS administrators either won’t look for or can’t see the simple ways to fix the basic parking problems in Yosemite Valley.” (Individual, Mountain View, CA - #6140)

Response: To allow the restoration of highly valued resources, the *Final Yosemite Valley Plan/SEIS* calls for limited parking in Yosemite Valley.

Parking levels within the Valley would be designed to accommodate the smaller visitation levels experienced from November through March. Shuttles from out-of-Valley parking sites to the Valley would not need to operate from November through March when parking in Yosemite Valley would be sufficient to serve day visitors. Out-of-Valley shuttle service would start in April, beginning with the weekends. As visitation increased and the demand for parking rose, out-of-Valley parking lots would meet this demand and shuttle service would be expanded, reaching a maximum level on weekends during the summer. The combination of some in-Valley parking, out-of-Valley parking, and shuttle service would be designed to meet the summer parking demand.

Generally, the peak visitation season for Yosemite National Park occurs from mid-June through Labor Day weekend. April, May, September, and October comprise the "shoulder" season, with intermediate levels of visitor use. Visitation is lowest from November through March.

235. Public Concern: The *Yosemite Valley Plan* should assign vehicles to specific parking lots during peak times and seasons.

“Here is how I see a better plan; retain about 5 or 6 day parking lots with about 1500 spaces. Some can be in the west end of the Valley. During all busy times and peak seasons, each day use car would be assigned to a certain parking lot so they can’t drive around the Valley. The Park can figure out how to monitor the lots to tell when they are filled.” (Individual, San Diego, CA - #3479)

Response: The Preferred Alternative includes a traveler information and traffic management system that would manage the number of vehicles in Yosemite Valley so as not to exceed the capacity of parking areas and roads. On days when visitor use is equal to or less than the capacity of the parking areas and roads, vehicles would be directed to parking areas in the Valley. When visitor use exceeds the capacity of facilities in activity areas in the park, primarily during the peak season months, the traveler information and traffic management system would use a variety of tools to guide people to available parking. Though many ideas exist for these tools (assigning spaces, reservations, etc.) final decisions will be made in subsequent planning efforts. The Preferred Alternative of the *Final Yosemite Valley Plan/SEIS* calls for parking to be consolidated into one lot in Yosemite Valley to achieve restoration and visitor experience goals that cannot be achieved through dispersed parking (see Chapter 4, Environmental Consequences).

582. Public Concern: The *Yosemite Valley Plan* should retain dispersed parking in Yosemite Valley.

“Blanket restriction on parking should not be necessary. We feel that even within the East Valley there is no need to completely eliminate 1600 parking spaces as discussed in the Draft Plan. Parking restrictions should be implemented on a case-by-case basis if (after implementation of plans to reduce auto presence in the East Valley) there are still locations with objectionable concentrations of automobiles. The Draft Plan recognizes that for the foreseeable future there will be automobile presence in the East Valley. With this in mind, we feel it is inefficient to eliminate the scattered parking while recreating parking in a central location.” (Recreational Organization, No Address - #3800)

Response: Small parking lots are less visually intrusive than larger parking lots, but they can cause increases in resource damage. Multiple scattered small parking areas are less efficient than larger, less numerous parking lots and as a result require more total parking spaces. Scattered parking areas spread air and other pollutants from autos (e.g., fluid leaks) over a larger area; drivers spend more time and travel longer distances searching for parking; visitors tend to drive from location to location, rather than parking their vehicles in one location and walking or traveling by shuttle to sites in the Valley; more roads are needed to connect small parking lots to one another.

The Preferred Alternative of the *Final Yosemite Valley Plan/SEIS* calls for day-visitor parking in the Valley to be consolidated into a single parking lot to allow the restoration of highly valued resources.

228. Public Concern: The *Yosemite Valley Plan* should retain roadside parking in Yosemite Valley.

“While we recognize that there have been problems with East Valley parking overflowing the lots and spreading willy-nilly along the roads (cf. the plan on page 3-96) this should not be a problem when enough day-visit vehicles are diverted. And while it may be necessary to carefully prescribe parking at selected East Valley locations (e.g., Lower Yosemite Falls, Yosemite Village, etc.) it would be counterproductive to limit roadside parking in general—elimination of these parking spaces would actually worsen congestion and parking problems in the East Valley since vehicles which are in the Valley but not destined for intensively used areas would be forced to use prescribed lots in the East Valley.” (Recreational Organization, No Address - #3800)

“Little or no justification is provided in the plan for the elimination of roadside parking in the Valley. The roads are already there, the turnouts and shoulders are already there, and little if any environmental impact would occur if they are used. The plan assumes in a general way that there is a correlation between the number of vehicles in the valley and the amount of traffic congestion in problem areas such as Curry Village and Yosemite Village. But a climber



who parks at the roadside and is on the rocks all day does not add to the traffic problems experienced at the Villages.” (Recreational Organization, San Marcos, CA - #4584)

“Leave the parking pull outs now existing west of Yosemite Lodge alone. Off-season visitors should not have to walk 5 miles to view some scene, especially since the parking already exists. It will be hard to ‘continue to enjoy the diverse recreational and social experiences currently available’ if the access to these experiences becomes limited due to the loss of road systems, pull-out parking areas, picnic areas, etc. As it is now, when we drive in, we always stop at several of the pull-outs along the road from Bridalveil Falls until we finally get to Curry Village. Each of these pull-outs gives a unique view of the different features of the Valley—Ribbon Falls, Sentinel Falls, Yosemite Falls, El Capitan (and the climbers), etc., plus different flora and fauna—all vying for attention, contemplation, and photographs. If these pull-outs are eliminated and/or bypassed by your bus system, you will certainly not be enhancing the people’s enjoyment of the Valley.” (Individual, Oakhurst, CA - #3379)

FOR CLIMBERS

“It appears under the Preferred Alternative 2 that there will be no roadside parking for climbing. But even if shuttle service is expanded, this will make it difficult or impossible to climb many routes in Yosemite. Often I have left Camp 4 at 4 or 5 in the morning, parked my car at the base of Middle Cathedral, or El Cap, and begun climbing. I doubt there will be shuttles running often at 4 a.m., and since many of these climbs need an early start in order to finish in daylight, it will effectively mean I cannot climb those routes. Of course, I could begin them later, but that might mean I’d be unable to finish by dark, which would make the climb more dangerous, and might even result in more rescues. Without the ability to park at the base of climbs, many long climbs in the Park will become impossible without greatly increasing the risk of becoming stranded by dark.” (Individual, Santa Cruz, CA - #1642)

Response: Currently, many roadside parking locations throughout the Valley degrade natural resources, especially those near meadows. In other areas the presence of vehicles along scenic viewpoints, in open space, and in discovery areas detract from the visitor experience. There are other areas where roadside parking contributes to traffic congestion and presents safety hazards. There are areas in the Valley where roadside parking may be appropriate, and these roadside parking areas, such as Southside Drive in the Bridalveil Fall area, will be retained for the most part. The National Park Service will retain other turnout areas as necessary for safety reasons or to provide access to historic viewpoints. To accomplish the goals of the Preferred Alternative of the *Final Yosemite Valley Plan/SEIS*, long-term roadside parking would be discouraged or prohibited and replaced with improved Valley-wide shuttle access.

Additionally, National Park Staff will study the safest and most convenient way to improve access to major Valley attractions for all visitors. Special provisions may be made for people with particular destinations and activities who are unable to use the shuttle bus system. Special provisions could include allowing people to travel in private vehicles and park at some destinations, or special shuttle trips to meet the unique schedule needs of climbers and other visitors.

548. Public Concern: The *Yosemite Valley Plan* should retain parking at Curry Orchard.

“Historic Curry Orchard: Retain the Parking . . .” (Individual, Seattle, WA - #1354)

Response: During development of the *Draft Yosemite Valley Plan/SEIS*, many considerations were used to determine suitable locations for parking, including highly valued resources, cultural landscape, rockfalls, floodplains, the River Protection Overlay, visitor experience, and traffic circulation.

In the *Draft Yosemite Valley Plan/SEIS*, Alternatives 1 and 5 included day-visitor parking at Curry Orchard. However, as described in Vol. IA, Chapter 2 of the *Final Yosemite Valley Plan/SEIS*, day-visitor parking is not provided at Curry Orchard in any of the action alternatives due to the zoning prescribed in the *Merced River Plan/FEIS*. Curry Orchard is zoned as 3B Visitor Base and Lodging, which does not allow for day-visitor parking.

214. Public Concern: The *Yosemite Valley Plan* should require the construction of parking facilities in Yosemite Valley.

CAMP 6

“Those cars that do park for the day inside the Valley should be parked at old Camp Six. This former campground was destroyed by the flood of 1997. The parking lot there should be temporary, to be used only until transit facilities are in place to accommodate all day-use visitors.” (Individual, Inkster, MI - #425)

ICE RINK AREA

“In the space left by the removal of the rafting concession headquarters (at the ice rink), I would like to see a large bus parking lot for day tour busses, overnight tour buses, and perhaps even NPS shuttle buses that are parked for the night along with a light bus maintenance facility.” (Individual, Columbia, CA - #7149)

NATIONAL PARK SERVICE STABLE

“By removing the NPS stable from its current site, more day-use parking for private vehicles could be available in the Yosemite Village area and thus also help to avoid the use of Camp 6.” (Individual, Columbia, CA - #7149)

CAMP CURRY

“Portions of Alternative 5 might also be worth keeping alive. Parking near Camp Curry would make it convenient for tent campers, most of whom arrive late in the day, to have their car near their camp site.” (Individual, San Francisco, CA - #131)

CAMP 7 AND CAMP 15

“Why don’t you use Camp 7 and Camp 15 for parking for the two months or three months of the year instead of having people being bused in for 15 or 20 miles or more, it’s ridiculous.” (Public Hearing, San Francisco, CA - #20019)

LOWER RIVER CAMPGROUND

“The current practice of using the Curry Village parking lot as the primary day-use parking lot has created a parking lot that is too crowded and congested, not only with cars, and shuttle buses, but also with pedestrians. A simple resolution to this dilemma is to take all the day-use parking areas for the entire Valley, and place them into the Lower River Campground, which is already in place, level and under tree cover so as not to be visible from Glacier Point. This is a natural location as it is within walking distance to almost all of the east Valley areas of interest, and would not require the creation of a new day-use parking lot at either Taft Toe or Pohono Quarry. Restrooms are already on site.” (Individual, American Canyon, CA - #907)

TRAILHEADS

“There is not enough parking for wilderness backpacking or day-use hiking to Nevada Falls, Half Dome, etc. There will not be shuttle service early enough in the day for those who wish to get a very early start on their hikes.” (Individual, Pacific Grove, CA - #156)

Response: During the development of the *Final Yosemite Valley Plan/SEIS* the suitability of numerous locations for parking and transportation-related facilities was evaluated. There are a limited number of areas available for development in Yosemite Valley out of the rockfall and highly valued resource zones. These limited areas were also considered for other services and operational needs such as lodging, camping, and maintenance areas. The Preferred Alternative of the *Final Yosemite Valley Plan/SEIS* offers a balance of development types and recreational areas in the most suitable locations.



The Preferred Alternative proposes to construct a day-visitor parking area in the Yosemite Village area, including a portion of the Camp 6 area. The plan also includes parking for day visitors at three new out-of-Valley parking areas on the approach routes to the Valley. Day-visitor parking near Yosemite Village is proposed because it would result in the development of fewer facilities in undisturbed areas. It would also reduce the impacts associated with introducing intensive visitor use in relatively lightly visited areas and would bring visitor parking in the Valley within walking distance of more popular destinations.

The number of Valley parking spaces provided in the plan was determined through an analysis of parking needs in each month of the year and was designed to meet the demand for day-visitor parking from November through March. Increased parking demand from April to October would be met through the out-of-Valley facilities and shuttle service. Underground and multi-level parking structures were considered for the Valley but were not proposed due to high costs and the natural resource constraints of the area.

564. Public Concern: The *Yosemite Valley Plan* should require the construction of transfer facilities in Yosemite Valley.

TAFT TOE

“I favor Taft Toe for main all season day-use parking. . . When [Yosemite Village lots] get full we stop allowing entrance to east Valley and use Taft Toe and only then, when very full and only on big days and summer jam ups do we revert to out-of-Valley parking.” (Individual, La Verne, CA - #324)

“Recommendation: That the National Park Service consider adding to Alternative 3 a variation that includes an attractive, combined parking garage, visitor center, and year-round service station at Taft Toe instead of the parking lot that is now contemplated. A semicircular design is envisioned, with 3 to 5 stories nestled near or into the hillside, partially shielded by trees, with picture windows or an open-air porch in the front of the visitor center looking out on a great view of El Capitan.” (Individual, Berkeley, CA - #3480)

YOSEMITE VILLAGE

“The need for a centrally located transit hub located at the visitor center as displayed in Alternative 2, we strongly support. We believe that by locating the transit hub at the center of visitor activity, the needs of Park visitors will be better met than what currently exists. The associated day-use parking facility located nearby will also meet the needs of visitors both during the busy summer months as well as in the off-season.” (Merced County Board of Supervisors, Merced, CA - #20114)

BRIDALVEIL FALLS

“The placement of a transit center at Bridalveil had no good reason for elimination. The claim that future fire or beetle infestation would make it visible is lame. This is true for almost any facility in the West end. It could be screened from view if carefully sited and screening could be augmented by planting more native trees.” (Individual, North Fork, CA - #6377)

“One alternative to provide some day visitor parking in the Bridalveil Fall area was dismissed because of its high potential to affect visual quality and the cultural landscape from two significant vantage points—Tunnel View and Valley View, due to a catastrophic event (e.g., wildfire). An easy solution to this potential visual problem would be to put up a thick net such as those used alongside golf driving ranges and tennis courts. The net would be dark green to blend in with the background. New trees can be planted and will grow high enough in 15 years that the net can be removed.” (Individual, San Diego, CA - #3479)

Response: The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* calls for the location of a transfer facility to allow visitors convenient access to the park’s primary visitor center for information and orientation, and to shuttle services and popular destinations within walking distance in Yosemite Valley. The facility would be located in an area zoned for this type of activity in the *Merced River Plan/FEIS*.

Its proposed location in Yosemite Village places the transfer facility in an area with existing intensive visitor use and a concentration of visitor support facilities. By concentrating transportation in an appropriate location, the potential impacts of buses and private vehicles can be significantly reduced elsewhere in the Valley. The level of vehicle activity in the vicinity of the transfer facility would be similar to or lower than that at the existing day-visitor parking areas in the Valley. Greater concentrations of pedestrians would occur at the transfer facility, but pedestrian facilities would be designed to accommodate the expected number of people while maintaining less crowded conditions.

By reducing vehicle traffic in other visitor-use areas, this facility would increase the opportunity for quiet contemplation and would enhance the ability of visitors to appreciate the natural resource values of the Valley. The proposed transfer facility locations at Yosemite Village would not be visible from Tunnel View.

683. Public Concern: The *Yosemite Valley Plan* should increase parking in Yosemite Valley for disabled visitors.

“I encourage you to consider assigning a large proportion of parking spaces to disabled parking, since it is harder for people with disabilities to use the mass transit options. Clearly you can monitor the demand for parking spaces among the disabled community and assign parking appropriately.” (Individual, Brisbane, CA - #6846)

Response: The *Final Yosemite Valley Plan/SEIS* proposes to reduce vehicle traffic in the Valley to allow visitors a more nature-oriented experience, one that is less affected by the presence of motorized vehicles. Special provisions, however, may be made for people with disabilities who are unable to use the shuttle bus system in the Valley. Special provisions could include allowing people with disabilities to use private vehicles to access some destinations (similar to the current management of the Happy Isles Loop and Mirror Lake Road) or making special vehicles available for people with disabilities.

131. Public Concern: The National Park Service should build underground parking facilities in Yosemite Valley.

“I do want one- or two-story underground parking facilities. One under the ‘orchard’ at Camp Curry. One under the existing parking lot adjacent to Yosemite Village market, and one somewhere near the old gas station location. Once these are built they require little maintenance, unlike your bus system. Parking fees can be per hour or per day. There will be less bear damage to cars with food left inside. The ground level or ‘roof’ can be planted in native or garden plants with picnic areas. . . I envision a parking structure similar to Pershing Square parking garage in downtown Los Angeles.” (Individual, El Dorado, CA - #243)

Response: Underground parking facilities are very expensive to construct. The construction of such facilities would have a significant impact on groundwater movement, and create significant volumes of soil that would require disposal. In addition, should the need for parking be reduced due to future increased use of regional transit to the Valley, surface parking would be much easier to remove. For these reasons, underground parking facilities were not considered in the *Draft* or *Final Yosemite Valley Plan/SEIS*.

327. Public Concern: The *Yosemite Valley Plan* should provide for high-density valet parking in Yosemite Valley.

“Day use parking at Yosemite Village or Taft toe should be San Francisco valet-style (super dense) with people leaving their keys. If super dense valet parking at Yosemite Village could eliminate the need for out-of-valley shuttles, any cost would pale compared to the cost of a bus system. If visitors are asked, valet-style parking will always be chosen over out-of-Valley parking.” (Individual, Fresno, CA - #20511)

Response: The operation of parking facilities is beyond the scope of the *Yosemite Valley Plan*. Operational issues such as how access to parking facilities are managed will be addressed during the



planning of the travel information and traffic management system which will be developed with extensive public input following completion of the *Yosemite Valley Plan*.

625. Public Concern: The *Yosemite Valley Plan* should include a parking space reservation system that requires visitors to leave cars parked during their visit.

“Assign incoming visitors to a definite parking spot either from previous reservation, or from a present park vacancy. At the ‘staging area’ outside the Valley proper, each visitor will receive a windshield sticker showing boldly his assigned site and number showing the date of arrival and the definite date of his departure and literature advising them that once in their assigned space their vehicle cannot be moved from there until date of departure and leaving the Valley--under penalty of a \$500 fine. From time of arrival they must use public transportation, hike, bike, horseback riding, etc., enjoying the beauty of the Valley and their surroundings. This plan would enhance the visitors visit. He would be able to drive to his assigned space, unload his family, food, clothing and equipment and take off to explore with a sense of freedom and enjoyment. Visitors without a space or reservation would have to go on a list for a vacancy, marking time outside of the Valley in a hotel, motel or campground.” (Individual, Yosemite National Park, CA - #255)

Response: The *Final Yosemite Valley Plan/SEIS* action alternatives include the implementation of a traveler information and traffic management system. This system could use reservations as part of a strategy to equitably allocate access to areas in Yosemite National Park when the demand for visitor use is higher than the capacity of visitor facilities or park resources. However, no decision has been reached regarding the use of reservations or other means of allocating access. The traveler information and traffic management system would be designed to encourage visitors to remain parked in the designated parking area until they left the Valley. The traveler information and traffic management system would be implemented after a planning and environmental compliance process that would include extensive public involvement.

31. Public Concern: The *Yosemite Valley Plan* should limit parking in Yosemite Valley.

“All those parking in the Yosemite Valley are a joke: They destroy [the] nature people are coming to experience. . . Looking down from the road leading up into the mountains, the Valley looked like any parking place in front of any parking place in front of any super-mall: cars everywhere, the whole valley filled with them.” (Individual, Groebenzell, Germany - #30022)

“If the powers-that-be in Yosemite have to eliminate parking in the Valley, how about eliminating the parking spaces at the large hotels? Let these hotel guests ride the transit buses into the Valley. Let’s see if the guests at the fancy hotels in Yosemite Valley are keen for their new transit experience.” (Individual, San Carlos, CA - #99)

“The consolidation and eventual elimination of in-Valley parking is crucial to the Park Service’s efforts to reduce the air pollution, water pollution, noise, automobile accidents, pedestrian accidents, and severe traffic congestion caused by too many vehicles in the Valley.” (Conservation Organization, San Francisco, CA - #4594)

Response: The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* calls for limited parking in Yosemite Valley. The number of parking spaces would be reduced and parking would be located to allow the restoration of highly valued resources to occur in currently impacted areas. Visitors traveling to the Valley in private vehicles would be directed to parking areas at their overnight accommodations or at the designated day-visitor parking area. Once visitors park, they would travel by shuttle or by nonmotorized means to other Valley destinations. No parking would be provided at individual destinations to discourage travel in the Valley by private vehicles.

Providing parking outside the Valley for overnight visitors was considered but dismissed due to the high cost and logistical complexity of transporting baggage and camping supplies for overnight visitors. Also, it was assumed that overnight visitors, especially campers, would be reluctant to leave their vehicles parked in a remote location. Vehicles act as supplemental storage areas for overnight visitors and, in the

case of recreational vehicles, the private vehicle provides overnight sleeping and cooking facilities. Furthermore, providing parking in remote sites for overnight visitors would require 24-hour security services at several remote locations, which would be expensive and labor intensive. Vehicle trips of overnight visitors represent a proportionally small amount of the traffic in the valley. The expense and visitor impacts of eliminating these vehicle trips were judged to be too great to justify the related benefits.

Day visitors who do not park in the Valley would arrive by shuttle bus from out-of-Valley parking areas approximately a half-hour from the Valley.

684. Public Concern: The *Yosemite Valley Plan* should prohibit the construction of new permanent parking facilities in Yosemite Valley.

“Prohibit construction of any new permanent parking lots in the Valley.” (Conservation Organization, San Francisco, CA - #4594)

Response: At this time there is not a feasible alternative to providing visitor access to Yosemite National Park and to accomplishing the five goals of the *General Management Plan* without the construction of additional parking facilities. The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* calls for day-visitor parking in Yosemite Valley to be consolidated into a single parking lot to allow the restoration of highly valued resources. The development of this single parking lot would be part of the design changes to the Yosemite Village area, one of the most highly visited areas in the Valley. In the Preferred Alternative, this parking lot would be in a similar location to what exists today at Yosemite Village. Additional parking lots would not be constructed in the Valley. Visitor facilities in the Village would be placed adjacent to visitor parking and shuttle operations so that it is not necessary for pedestrians to cross Yosemite Village Drive. Yosemite Village Drive would be rerouted around the perimeter of the Village so as to avoid potential conflicts between pedestrians and vehicles.

130. Public Concern: The *Yosemite Valley Plan* should restrict parking to recognized parking areas in Yosemite National Park.

“How can you believe that removing people and restricting travel will cure the Park’s problems? By restricting the parking to only recognized parking areas you can restrict both the overcrowding problem and the traffic problem. It does, however, require more oversight to work correctly: (1) Tow cars parked in inappropriate areas; (2) Restrict access by trail permits and enforce their use (no permit, no hike); (3) Restrict vehicular traffic, bikes included, to only those areas where this kind of traffic is allowed; (4) Enforce the laws and regulations currently on the books. Most of the current management problems are due to the Park Service being reluctant to use items 1 to 4 above.” (Individual, No Address - #415)

Response: The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* proposes to restrict visitor parking and traffic to designated areas. Consolidating day-visitor parking into a single in-Valley parking lot with three out-of-Valley parking areas would enable the National Park Service to better manage and monitor parking. Increased management would be used to prevent unauthorized vehicle parking and travel in unauthorized areas. Simply enforcing existing regulations would not solve the problem of having inadequate facilities for the number of people visiting the Valley. Roadside parking and parking in nonendorsed areas occurs because the parking demand is greater than the supply. The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* proposes to provide shuttle bus service from designated parking locations outside the Valley as an alternative means of access. By providing the shuttle service and controlling the number of vehicles that enter the Valley, parking in areas other than designated lots would be reduced.



158. Public Concern: The *Yosemite Valley Plan* should not propose the construction of parking facilities in undeveloped areas of Yosemite Valley.

“I cannot understand why established parking areas within the Valley should be ripped up and restored to natural conditions while relatively pristine areas elsewhere in the Valley are destroyed for parking. . . Far better than one 550-site lot at Camp 6 would be to retain the 50 Yosemite Falls sites and the 219 day-visitor Yosemite Lodge sites, and to expand and reconfigure the existing Village Store lot from 130 sites to 281 sites.” (Individual, Oberlin, OH - #580)

Response: The 550-space parking area proposed in the Yosemite Village area in the Preferred Alternative would be located on land that is largely already disturbed. Final designs have not been prepared for the parking area; however, it could use land now occupied by the Village Store lot or land that is currently used for day-visitor parking in the Camp 6 area. The final design and location of parking would be selected to maximize the restoration of highly valued resources, to give the best opportunity for the natural processes of the Valley to prevail, and to provide convenient access for visitors in a natural setting that emphasizes the scenic and other natural values of Yosemite Valley.

A single parking area is proposed, rather than multiple smaller lots, because it would be easier to direct visitors to such a lot and because all day visitors would be able to walk from the parking area to the Visitor Center. Locating day-visitor parking in the Yosemite Falls area and at Yosemite Lodge would introduce day-visitor traffic into an area that otherwise would be relatively free of the influence of high volumes of traffic. By consolidating parking in one location, overall traffic volume in the Valley would be reduced by eliminating cars traveling from one lot to another searching for a place to park. Also, fewer parking spaces would be needed because a single lot would be more efficient than scattered parking.

173. Public Concern: The *Yosemite Valley Plan* should emphasize the use of small, unobtrusive parking lots throughout Yosemite Valley.

“Turning huge meadows into asphalt parking lots, as we did near Camp Curry so that we could force people to abandon their cars and take the bus to Happy Isles, is far more ruinous of the environment than small parking lots nestled among the trees. We still have smaller lots at places like Bridalveil and we used to have them at Happy Isles, Indian Caves and Mirror Lake. We need fewer big open parking areas and more secluded small ones.” (Individual, Pacific Palisades, CA - #17)

“I think it may be possible to build some scattered small parking lots at places like Taft Toe or near El Cap (existing parking) that have minimal impact. It may be useful to have some parking outside the east end of the Valley, if day parking is cut way back in the east end. Another advantage is that this would provide somewhere in the west end of the Valley to park, at times when the shuttle won’t run, possibly winter, rather than have to walk from the parking at the Village.” (Individual, Arroyo Grande, CA - #3555)

Response: The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* calls for day-visitor parking in the Valley to be consolidated into a single parking lot.

The advantages of locating parking for day visitors in a single lot were considered in developing the action alternatives for the *Yosemite Valley Plan* (see Vol. IA, Chapter 2). A given number of parking spaces in scattered parking lots would require more development area than the same number of spaces in a single lot. The space required for circulation, buffers from adjacent uses, drainage, and access to and from the lot is minimized with a single parking lot. Providing parking in one location also reduces the vehicle traffic associated with visitor travel to and from parking, including the potential need to travel among scattered locations in search of empty spaces.

These advantages were considered more important than the advantages of potentially less visibility and, for some visitors, the ability to park closer to Valley destinations with scattered parking. As a result, the action alternatives provide parking for day visitors in a single lot that can be managed to maximize access for day visitors.

32. Public Concern: The *Yosemite Valley Plan* should prohibit the construction of transfer facilities in Yosemite Valley.

“I am against a huge super parking structure in Yosemite Valley. Tunnel View should remain as is for future generations to enjoy.” (Individual, No Address - #99)

TAFT TOE

“We are opposed to Alternatives 3 and 4 because of the proposed Parking at Taft Toe.” (Individual, Santa Barbara, CA - #109)

“[The Taft Toe development] expands the footprint of developed area in Yosemite Valley by about 2.1 miles in a westerly direction, into previously and historically undeveloped areas. Would degrade the magnificent and sweeping views of the Valley floor . . . from elevated positions and from positions on or along the rim, which would be preserved for future generations of Park visitors. Would also bring new development very close to areas along the south bank of the Merced River in the vicinity of El Capitan View, and the sandy riverbank area east of there for some distance, the locale of some of the finest scenic views of El Capitan and the River. This development should not take place.” (Individual, Los Angeles, CA - #470)

YOSEMITE VILLAGE

“A central transit facility should not be constructed in Yosemite Village. This would result in a large concentration of people in a small area. The indicated transport interval was a bus arriving or departing every 39 to 45 seconds. The amount of noise, excitement, hubub, and commotion here would far exceed anything known before. This is Yosemite Village. It is not Grand Central Station, nor should the ambience of one be created here. Visitors do not come to Yosemite for that type of experience. Conditions should remain quiet and peaceful, consistent with the magnificence of the natural surroundings.” (Individual, Los Angeles, CA - #470)

Response: At this time there is not a feasible alternative to providing visitor access to Yosemite National Park and to accomplishing the five goals of the *General Management Plan* without the construction of parking and transit facilities.

A transfer facility is required to afford visitors convenient access to shuttle services and walking routes within Yosemite Valley. The facility would be located in an area zoned for this type of activity in the *Merced River Plan/FEIS*.

The Preferred Alternative places the transfer facility in Yosemite Village, an area with existing intensive visitor use and a concentration of visitor support facilities. By concentrating transportation in an appropriate location, the potential impacts of buses and private vehicles can be significantly reduced elsewhere in the Valley. The level of vehicle activity in the vicinity of the transfer facility would be similar to or lower than that at the existing day-visitor parking areas in the Valley. Greater concentrations of pedestrians would occur at the transfer facility, but pedestrian facilities would be designed to accommodate the expected number of people while maintaining uncrowded conditions.

By reducing vehicle traffic in other visitor-use areas, this facility would increase the opportunity for quiet contemplation and would enhance the ability of visitors to appreciate the natural resource values of the Valley. The proposed transfer facility location at Yosemite Village is not visible from Tunnel View.

709. Public Concern: The *Yosemite Valley Plan* should require the removal of parking at Camp 6.

“Parking at Camp 6 should be removed and that area restored to natural conditions. It might make a good picnic area.” (Individual, Modesto, CA - #3538)

“To eliminate the parking lot use of Camp 6 is desirable because I believe that it is important to have a continuous connection of wetlands between the east end of Yosemite Valley to Bridalveil Meadow because this would enhance



the natural processes between the main Merced River channel, riparian borders, and meadows and promote healthy wetlands in the area and provide a corridor of wildlife through the length of the Valley. I believe this is important enough to justify expanding day-use parking in the Yosemite Village area other than Camp 6 by any means possible.” (Individual, Columbia, CA - #7149)

Response: During development of the *Draft Yosemite Valley Plan/SEIS*, many considerations were used to determine suitable locations for parking, including highly valued resources, cultural landscapes, rockfalls, floodplains, the River Protection Overlay, visitor experience, and traffic circulation.

The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* proposes to reduce the number of parking spaces in Yosemite Valley for day visitors and to locate day-visitor parking in a single parking lot. This lot would be located in what is now Yosemite Village and Camp 6. However, parking at Camp 6 would be reconfigured and portions of the area restored, including establishing a 150-foot River Protection Overlay adjacent to the Merced River. The River Protection Overlay would create a continuous riparian corridor through Yosemite Valley (see Vol. IB, Chapter 4, Environmental Consequences).

The development of this single parking lot would be a component of the development plans for the Yosemite Village area, one of the most highly visited areas in the Valley. Concept development plans place visitor facilities in this area adjacent to visitor parking and shuttle operations so that it would not be necessary for pedestrians to cross Yosemite Village Drive. Yosemite Village Drive would be rerouted around the perimeter of the Village (potentially into a portion of Camp 6) so as to avoid potential pedestrian conflicts. Site design and specific plans for the area are beyond the scope of the *Yosemite Valley Plan* and will be addressed in subsequent planning processes.

515. Public Concern: The *Yosemite Valley Plan* should include criteria for eliminating parking at Camp 6.

“The Record of Decision must include criteria for ending the use of Camp 6 for day-use parking. The NPS must explain what circumstances will finally trigger the end of day-use parking in the Valley and fulfill the GMP’s ultimate goal of removing all private vehicles from Yosemite. Our organizations believe the NPS could commit to closing Camp 6 (and restoring the area) as soon as the satellite parking lots are in use and YARTS is operating at full capacity, such that out-of-Valley parking can fully accommodate all day-use visitors.” (Conservation Organization, San Francisco, CA - #4594)

Response: Establishing additional criteria to guide future development or restoration projects, such as elimination of parking at Camp 6, is beyond the scope of the *Yosemite Valley Plan*. At this time, there is not a feasible alternative to providing visitor access to Yosemite National Park without the presence of some parking in Yosemite Valley (see Vol. IA, Chapter 2, Alternatives, Alternatives Considered but Dismissed).

The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* proposes to reduce the number of parking spaces in Yosemite Valley for day visitors and to locate day-visitor parking in a single parking lot. This lot would be located in what is now Yosemite Village and Camp 6. However, parking at Camp 6 would be reconfigured and portions of the area restored, including establishing a 150-foot River Protection Overlay adjacent to the Merced River. The River Protection Overlay would create a continuous riparian corridor through Yosemite Valley (see Vol. IB, Chapter 4, Environmental Consequences).

During development of the *Draft Yosemite Valley Plan/SEIS*, the criteria used to determine the suitable locations for parking included highly valued resources, cultural landscape, rockfall, floodplains, River Protection Overlay, visitor experience, and traffic circulation. In the future, the National Park Service would continue to refine visitor use levels and land management zoning in the Valley. The *Final Yosemite Valley Plan/SEIS* identifies a process for identifying future sociological, ecological, and cultural preservation conditions (see Chapter 2, Alternatives, Actions Common to All Action Alternatives).

4.13.5.c ~ Out-of-Valley Parking

As with Yosemite Valley parking, respondents commenting on out-of-Valley parking suggest a number of sites where facilities either should or should not be built and request several points of clarification in the *Final Yosemite Valley Plan/SEIS* regarding such sites. Respondents request satellite parking facilities at various locations:

- Badger Pass
- Chinquapin Junction
- Henness Ridge
- Yosemite West
- Wawona
- El Portal
- Hazel Green

Hazel Green, in particular, is the subject of extensive comment. A number of individuals argue that Hazel Green is a superior site to South Landing based on several factors: lower vehicle emissions resulting from reduced travel time for visitors entering the park from the west, mutually beneficial use by both the National Park Service and the University of California, Merced, Sierra Research Institute, and potential great grey owl conflicts at the Preferred Alternative's South Landing site. But, according to one conservation organization, wherever parking facilities are proposed, "they should be planned, purchased, and completed within a year of the ROD [record of decision]."

Proposals to limit parking vary from numerical limitations to complete prohibitions on developing or expanding parking facilities in areas such as Hazel Green, Foresta, Oakhurst, South Landing, Inspiration Point, and Badger Pass. More often than not, respondents exhort the National Park Service to avoid developing these sites because such projects would disturb pristine land. This, according to one individual, is contrary to the 1916 Organic Act "mandating the unimpaired preservation of this land, the scenery, natural objects, and wildlife contained therein for all time." Three additional reasons respondents offer for not developing out-of-Valley sites include the National Park Service's alleged lack of jurisdiction in areas outside of Yosemite, the potential for rush hour traffic into the Valley caused by those not opting to ride a bus, and the detrimental effect on visitor experience.

Respondents request that the *Final Yosemite Valley Plan/SEIS* do a better job of addressing the scope and impact of parking facilities at both Hazel Green and in El Portal. In the case of Hazel Green, one person questions the appropriateness of approving a parking lot before the completion of an environmental impact study. Regarding El Portal, respondents seek clarification of the cost, design, operation, and recreational vehicle use of any proposed parking facility.

91. Public Concern: The *Yosemite Valley Plan* should require the construction of parking facilities outside of Yosemite Valley.

"Many years ago I commented on the original Yosemite Valley Plan, and supported the alternative that required all day visitors to park outside of the Valley. I still think that this is the best plan, and would be happy to park outside of the Valley myself when making a day visit. In fact, I would prefer it because I would then not have to deal with finding a parking place, particularly with snow on the ground. Therefore I support Alternative 2." (Individual, Danville, CA - #371)



“Day-use vehicles should be parked in suitable parking structures outside of the Valley and the visitors shuttled by bus or tram into the Valley. The Transportation service should be improved and a nominal fee charged to cover increased costs.” (Individual, La Crescenta, CA - #515)

“Establish out-of-Valley reception areas with well designed parking areas, bus service to the Valley, visitor centers, retail sales, and food service at Badger Pass, South Landing, and El Portal.” (Individual, Oberlin, OH - #580)

BADGER PASS

“I especially like use of Badger Pass as an out-of-Valley parking location.” (Individual, Pacific Grove, CA - #156)

“Since out-of-Valley parking seems to be really necessary, I think it should all be in El Portal because El Portal will be connected to the Valley by the best, newest, and shortest road. Any road accidents involving large numbers of bus passengers for example would be limited to the El Portal Road and emergency services would be available sooner.” (Individual, Columbia, CA - #7149)

CHINQUAPIN JUNCTION

“The use of Badger Pass for parking for visitors coming from the south would seem to add 45 minutes (possibly an hour) to get to the Valley. Why not have parking in the Chinquapin Junction vicinity (old gas station, restroom, ranger property)?” (Individual, Del Mar, CA - #64)

HENNESS RIDGE

“An expanded Henness Ridge parking area would be superior to Badger Pass if out-of-Valley parking is required for the south entrance route, because Badger Pass is quite a ways out of the way.” (Individual, Oakhurst, CA - #3379)

YOSEMITE WEST

“I believe that you have overlooked the value of the areas known as Yosemite West in the Draft of the Valley Implementation Plan, and, I would like once again to offer the values of this strategically located, privately owned, and undeveloped 752 acres of land for your consideration before your final acceptance of the Yosemite Valley Plan. We have the potential to reduce day-use parking and traffic congestion in the Valley by providing another, perhaps more convenient, economical, and desirable parking site for day use visitors, who could then be bused to the various points of interest from this centrally located site.” (Individual, San Jose, CA - #5604)

WAWONA

“Why isn’t Wawona given consideration for out-of-Valley parking? Wawona seems ideal because a substantial infrastructure already exists, including gas station, grocery, Park offices, etc. Wawona seems preferable to Badger as time and energy lost in the Chinquapin to Badger merry-go-round, more than offsets the slightly increased time. The argument against Wawona might be that day use by 150 cars would be growth inducing; however, virtually all car parking at Badger would also stop at Wawona for groceries, gas, restrooms, and directions. In short, why wasn’t Wawona even considered for out-of-Valley parking?” (Individual, Monroe, OR - #404)

EL PORTAL

“If Park administrators feel compelled to accommodate 18,000 visitors, there should be one out-of-Valley lot in El Portal. Asking cars at Cascades Dam to drive to El Portal to get to the Valley is no more out of the way than asking cars at Chinquapin to drive to Badger Pass. In Oakhurst, cars could be directed to El Portal.” (Individual, Fresno, CA - #20511)

HAZEL GREEN

“The County of Merced is supportive of the proposed staging area on Highway 120 at Hazel Green Meadow. This staging area will allow for visitors to park outside the congested Valley and ride a transit bus from this location which provides service both for east bound and west bound Park visitors. The placement of a staging area on this

property also provides for the development of a research station for UC Merced in partnership with the National Park Service's Sierra Studies Institute." (Merced County Board of Supervisors, Merced, CA - #20114)

"The Economic Development Corporation of Mariposa County endorses the Hazel Green project designed by Destination Villages. We request that you consider the Hazel Green staging area suggested in Alternative 4 in your final plan for the following reasons: It is essential to this region that UC Merced and Yosemite National Park cement their relationship during this development period for both entities. Co-locating a Yosemite staging area with the UC Merced Sierra Research Institute is a practical step in this direction. The developer for Hazel Green has offered facilities consistent with the plans of both organizations at no cost to either, a savings for state and federal taxpayers. Moving the parking and staging area from South Landing to Hazel Green will save emissions from vehicles coming from the west. It is true that cars from the east will have to drive farther to get to the staging area if their drivers wish to park and ride. However, snow eliminates vehicles coming from the east during a significant portion of the year, and, during summer, some riders from Lee Vining have the option of coming on YARTS buses directly to the Valley. It seems logical that cutting the number of vehicle emissions coming from the west takes priority over reducing emissions from the east." (Business, Mariposa, CA - #1797)

"Our studies indicate that we do not have a Great Grey Owl problem, but that one may exist at South Landing. The Draft Plan makes clear that parking facilities at South Landing will require significant further environmental impact studies, as well as substantial construction; this is not so at Hazel Green. We know that if the parking is changed to Hazel Green, it will happen; but if it stays at South Landing the environmental constraints may prohibit it. Placing the Parking on private rather than Park property just makes more sense. We believe that we are entitled to access from Hazel Green to Highway 120 in any event. And, finally, Highway 120 is already enlarged at the Hazel Green location." (Public Hearing, Fresno, CA - #20482)

Response: The Preferred alternative in the *Final Yosemite Valley Plan/SEIS* calls for parking for day visitors to be located along each of the approach routes to Yosemite Valley and in the Valley in designated locations (Badger Pass, El Portal, and Hazel Green or Foresta). Parking locations are identified for each approach route to the Valley to provide convenient parking for all day visitors. Visitors parking outside the Valley would be transported to the Valley on shuttle buses. Alternatives 4 and 5 include day-visitor parking at other candidate sites (Foresta and South Landing on Big Oak Flat Road; and Henness Ridge, near Yosemite West and the Chinquapin intersection on Wawona Road).

Candidate sites for out-of-Valley parking were identified by locating areas of adequate size to meet the expected parking demand. Sites with steep slopes, sites within designated Wilderness, and sites that were more than one mile from a major park road were not considered. Meadows and meadow edges were not considered to be appropriate sites because of potential wildlife impacts and loss of valuable natural resources. Wawona was not identified as a candidate site for parking for day visitors to Yosemite Valley because the existing parking areas are fully utilized by visitors to Wawona and users of the shuttle from Wawona to the Mariposa Grove of Giant Sequoias. There was not adequate flat land available outside of meadows and other highly valued resources to accommodate the expected parking demand in Wawona. In addition, the long travel distance from Wawona to the Valley would make the shuttle fleet larger and more expensive to operate.

Trade-offs exist among the alternative locations identified in the *Final Yosemite Valley Plan/SEIS* for parking areas along the Wawona Road and Big Oak Flat Road. Locations closer to the Valley offer the advantage of quicker travel times to the Valley and the need for a smaller fleet of shuttle buses. Some of the alternatives, like Badger Pass and Hazel Green, have the disadvantage of requiring some visitors to travel out of their way to reach the staging area. However, these alternatives have the advantage of requiring less development on previously undisturbed land and the opportunity for multiple uses, reducing the overall need for development in and near the park. All of the advantages and disadvantages of the alternative out-of-valley parking locations were considered in identifying the Preferred Alternative in the *Final Yosemite Valley Plan/SEIS*.

Providing all parking for day visitors to Yosemite Valley in locations outside the Valley was considered but dismissed in the *Final Yosemite Valley Plan/SEIS*. Serving all day visitors with shuttles from remote



locations would require a very large fleet of buses, large parking areas outside the Valley, and year-round operation of the shuttle bus system. The roads leading to the Valley from the north and the south traverse high elevations that are subject to heavy snows in the winter. Operating shuttle buses on these routes in the winter and keeping parking areas cleared of snow would be difficult and expensive. Weather conditions in the winter would make waiting for shuttle buses uncomfortable. The number of parking spaces provided in the Valley for day visitors is adequate from November through March, when the heaviest snows occur. Day visitors on a typically busy day would use the parking provided in the Valley for day visitors in the winter, along with out-of-Valley parking. As a result, a balance of access by shuttle buses and by private vehicles would be provided for day visitors in the peak season.

520. Public Concern: The *Yosemite Valley Plan* should require the National Park Service to implement out-of-Valley parking facility plans within one year of the Record of Decision.

“We believe satellite lots should be planned, purchased, and completed within a year after the ROD—not in Phase 3 of the implementation. We support satellite lots at Badger Pass, El Portal, and Hazel Green with a small lot, if necessary, at Crane Flat.” (Conservation Organization, San Francisco, CA - #4594)

Response: The sequencing plan (see Vol. II, Appendix M) outlines the sequence of actions that will occur over a period of years. Actions such as out-of-Valley parking do not stand alone as independent actions, but are linked to several supporting actions to reach a fully functional out-of-Valley transit system. The associated support projects include establishing an in-Valley drop-off system, purchasing buses, establishing maintenance facilities for buses, and hiring and constructing housing for bus drivers. The projects will be sequenced according to the physical and operational links between developing replacement facilities outside Yosemite Valley, relocating functions, and rehabilitating or removing structures. (See Appendix M for more information.)

614. Public Concern: The *Yosemite Valley Plan* should limit parking outside of Yosemite Valley.

“Provide no more than 600 parking places outside the Valley.” (Individual, Oakhurst, CA - #129)

Response: To provide visitor access to Yosemite National Park and to accomplish the five goals of the *General Management Plan* it would be necessary to construct additional parking facilities so that areas with highly valued resources could be restored. Since the Preferred Alternative of the *Final Yosemite Valley Plan/SEIS* proposes to reduce the number of day-visitor parking spaces in Yosemite Valley, it is necessary to replace these parking spaces with parking in other locations. Providing only 600 parking spaces outside of Yosemite Valley is insufficient to provide parking accommodations to meet the visitor use levels projected in the *General Management Plan*. During the period from November through March, parking spaces in the Valley are expected to be adequate to meet the demand of day visitors. During these months, out-of-Valley parking lots would not be used. During the summer months of higher visitation, the park would operate out-of-Valley parking lots with shuttle service to the Valley. These out-of-Valley lots would be designed to accommodate the increased number of visitors during the peak summer season.

Out-of-Valley parking is limited by several factors: site specific limitations due to geography and ecological concerns, shuttle system capacity, identified need based on day use of Yosemite Valley, seasonal variations in visitation, and the effects on visitor experience.

56. Public Concern: The *Yosemite Valley Plan* should prohibit the construction of parking facilities outside of Yosemite Valley.

“Action: Construct out-of-Valley parking areas. Result: Resource mismanagement. Prohibited destructive development of Park land. Would cut down forests, irreversibly destroy natural topography, and reduce natural habitat into parking to development that should remain in preservation. Contrary to the Act of Congress of October 1, 1890, designating this land as a forest reservation, to protect from injury all timber contained therein. Contrary to the Organic Act of August 25, 1916, mandating the unimpaired preservation of this land, the scenery, natural objects, and wildlife contained therein for all time. Day-visitors can be bused in from outside the Park by regional transportation.” (Individual, Los Angeles, CA - #470)

“The remote parking is by definition out-of-Valley and forces the visitors to change mode of travel before they get even a glimpse of their destination. Thus much excitement and family fun (particularly for young visitors) is greatly reduced.” (Individual, Phoenix, AZ - #2534)

“As long as there is parking for anyone in the Valley, adding parking lots outside the Valley will only make things worse. You are going to end up with a rush hour every morning because most people are not going to want to ride a bus into Yosemite Valley.” (Individual, No Address - #188)

HAZEL GREEN

“I urge you not to allow development of parking at Hazel Green, as shown in Alternative 4.” (Individual, Mariposa, CA - #68)

“Hazel Green is a bad place for parking. The trip to the Valley is longer than South Landing, and therefore more expensive, and more undisturbed area will be converted to pavement because of the need for a new road. It will promote yet another hotel complex on Yosemite’s border that further hinders wildlife movement.” (Individual, Fresno, CA - #20511)

“Action: Out-of-Valley parking development at Hazel Green. Result: Private land outside of Yosemite National Park. Outside of the legal jurisdiction of the National Park Service.” (Individual, Los Angeles, CA - #470)

FORESTA

“The proposed 520-space parking lot in Foresta. This facility would require at least 6 acres of presently undeveloped land. In addition, the cumulative impact of this lot, combined with the proposed other new uses in Foresta . . . would have a significant and devastating impact on the Foresta/Big Meadow environment, and would dramatically reduce the quality of the Park experience and life style in this fragile area. The use of 13 shuttle buses, making multiple trips a day, combined with over 500 vehicles coming to and from the parking lot each day, would result in a tremendously increased traffic flow and air pollution in the area with resulting negative impacts on the vegetation and wildlife in the area.” (Individual, Santa Barbara, CA - #109)

OAKHURST

“I live in the Oakhurst area just outside the Park and do not want or need a city parking lot here, plus there is no place to put one that will not harm the scenic beauty and environment in the Oakhurst/Bass Lake/Ahwahnee area.” (Individual, Oakhurst, CA - #2228)

SOUTH LANDING

“Action: Out-of-Valley parking development at South Landing. Result: Insufficient level terrain in this vicinity without extensive terracing and grading. Destructive development located close to the Merced Grove of Giant Sequoias, a highly valued and protected natural resource of Yosemite National Park. This area should not be disturbed.” (Individual, Los Angeles, CA - #470)

Response: During the development of the *Final Yosemite Valley Plan/SEIS* the National Park Service considered numerous locations throughout Yosemite Valley and along park roadways for the location of



parking facilities. The 1980 *General Management Plan* called for reducing impacts of parking in Yosemite Valley, primarily through the removal of parking. The *Final Yosemite Valley Plan/SEIS* recognizes that for the foreseeable future, some parking will continue to be needed. At this time there is not a feasible alternative to providing visitor access to Yosemite National Park without the construction of parking facilities. The National Park Service is working with the Yosemite Area Regional Transportation System Authority (YARTS) to plan and develop a regional transportation system. It is through that planning process that a regional transit system and associated parking outside park boundaries would be created. In the region surrounding Yosemite, local communities control the process for deciding if, or where, parking, transit stops, or transit centers would be located. The four action alternatives presented in this *Final Yosemite Valley Plan/SEIS* are independent of a regional transportation system (although several of the alternatives present various options for accommodating the needs of such a system). Options are presented for creating a transfer facility in Yosemite Valley that would accommodate visitors coming from gateway communities. The National Park Service does not control the investment of private funds or have the legislative authority to create and operate a transportation system outside the boundaries of the park. Due to the continued need to provide access to Yosemite Valley, parking facilities are being proposed that are within the jurisdiction of the National Park Service.

172. Public Concern: The *Yosemite Valley Plan* should prohibit enlarging the parking area at Tunnel View (Inspiration Point).

“No more huge asphalt eyesores please, especially near the entrance to the Valley. The present parking area at Inspiration Point is very adequate for a first and last view of the Valley. Let’s not make it bigger.” (Individual, Pacific Palisades, CA - #17)

Response: The *Final Yosemite Valley Plan/SEIS* does not propose any changes to the Tunnel View (Inspiration Point) area.

408. Public Concern: The National Park Service should prohibit enlarging the parking area at Badger Pass.

“I do not like having a bigger lot built at Badger Pass. Keep that Glacier Point Road for hikers and skiers. Put your bigger secondary parking lot at the Wawona area.” (Individual, No Address - #1168)

“If we can use Badger Pass [as a parking area] without spending money on it, then it’s good. However, in the long run, it’s making people drive five miles farther. It’s going to cost a lot more because the buses have to go farther. It’s going to be hard to operate during May and June snowstorms.” (Public Hearing, Fresno, CA - #20489)

Response: The Preferred Alternative of the *Final Yosemite Valley Plan/SEIS* proposes to use the existing parking lot at Badger Pass to support day visitors during the peak summer months. The expansion of this lot is not necessary based on the anticipated demand for visitor parking. The Preferred Alternative of the *Final Yosemite Valley Plan/SEIS* calls for 410 day-visitor parking spaces to be located at Badger Pass. This is less than the 750 existing winter use parking spaces. It is anticipated that upgrades are necessary to Badger Pass to ensure facilities (such as the waste water system) are suitable for summer use.

491. Public Concern: The *Yosemite Valley Plan* should address the scope and impacts of the proposed Hazel Green parking facility.

“What is the scope of the SNRI facility being offered by Hazel Green? How can you approve a parking lot at Hazel Green without an environmental impact study.” (Individual, Merced, CA - #9329)

Response: The *Final Yosemite Valley Plan/SEIS* Preferred Alternative (Alternative 2) proposes to reduce the number of parking spaces in Yosemite Valley for day visitors and to locate Valley parking in a single parking lot. Additional day-visitor parking would be located in out-of-Valley parking lots at Hazel Green,

El Portal, and Badger Pass. These areas would be designed to accommodate day-visitor parking and shuttle operations serving the Valley.

The Preferred Alternative includes both an access road into the Hazel Green site as well as the National Park Service parking lot. Impacts of these actions are addressed in Vol. IB, Chapter 4, Environmental Consequences. The Sierra Nevada Research Institute—University of California, Merced facility and private development proposed at the site are outside the scope of this planning effort. Development on this private property would be subject to approval by Mariposa County. Impacts from these actions are addressed only under cumulative impacts analysis. Specific design plans for the out-of-Valley parking areas are beyond the scope of the *Yosemite Valley Plan* and will be part of subsequent site design plans.

374. Public Concern: The *Yosemite Valley Plan* should provide additional detail regarding proposed development in El Portal.

“The location of El Portal parking spaces has not been identified within the Plan. In fact, much about the El Portal portion of the Plan is undefined. Greater specificity is needed in order to determine practical costs, design and operations.” (Business, Yosemite National Park, CA - #3962)

Response: The National Park Service realizes that the El Portal Administrative Site is an intricate part of being able to implement many actions called for in the *Final Yosemite Valley Plan/SEIS*. A comprehensive, land based, development plan is needed for the El Portal community. However, a detailed development plan for the area is beyond the scope of the *Yosemite Valley Plan*. Consequently, the development plan would be prepared as a separate future planning effort. That planning effort would include alternatives for El Portal based on actions being called for in this plan such as relocations of National Park Service and concessioner headquarters/administrative functions, employee housing, out-of-Valley parking and employee commuter lots. An El Portal development concept plan would include appropriate environmental compliance as well as ample public participation.

627. Public Concern: The *Yosemite Valley Plan* should clarify recreational vehicle parking opportunities in El Portal.

“We are told that limited parking lots will be placed at El Portal. Are there planned spaces for RV parking in these lots? If not, where do the ‘closed out of camping’ RVers park to ride in on the day buses.” (Individual, Graham, NC - #113)

Response: The Preferred Alternative (Alternative 2) in the *Final Yosemite Valley Plan/SEIS* proposes to reduce the number of parking spaces in Yosemite Valley for day visitors and to locate Valley parking in a single parking lot. Additional day-visitor parking would be located in out-of-Valley parking lots, serviced by a Valley shuttle. At each of these parking locations, both in and out-of-Valley, a portion of the proposed spaces would be allocated for oversize vehicles including recreational vehicles. Specific plans to improve recreational vehicle facilities in El Portal are beyond the scope of the *Yosemite Valley Plan*, but will be addressed in subsequent planning efforts.

4.13.6 ~ Traffic Management

Although roads, trails, bridges, parking, and public transportation all affect traffic in Yosemite Valley, this section focuses on general traffic management concerns and aspects of traffic management that are less infrastructure-dependent than the above topics. The three groups of concerns found below address planning and analysis, improved signage, and enforcement. To ease congestion in the Valley, one public hearing speaker suggests that the National Park Service develop a specific transportation management system. For another respondent, sociological considerations—such as how visitor response to private vehicle restrictions will affect traffic patterns in Yosemite Valley—have not been adequately addressed in the *Draft Yosemite Valley*



Plan/SEIS. This person claims that such an analysis might better inform decisions regarding the location of out-of-Valley parking.

Road signage, some say, is one aspect of traffic management long overdue for improvement in Yosemite Valley. To remedy this deficiency, respondents propose such measures as improving the visibility of existing signs and establishing traffic lights. For some, this is a much more economical approach than building new roads or adding buses to the Valley. However, one person strongly believes traffic lights should not be used, though no rationale for this position is given.

Another facet of traffic management that respondents address is enforcement. Respondents urge the National Park Service to both enforce parking regulations in the Valley (especially Yosemite Village) and ensure adequate security for out-of-Valley lots. Also, in the case of speed limits, before they are enforced, they must first be lowered. “Instead of widening Southside Drive,” writes one person, “the speed limit should be reduced.” However, in order to accomplish any of the above enforcement measures, adequate enforcement officers must be present in the Valley. One individual poses the following challenge: “If you do not believe that more traffic enforcement and better signs are needed, sit at the Sentinel Bridge intersection for just one hour on a Wednesday.”

Finally, a number of people question the need for traffic check stations in west Yosemite Valley—especially at Taft Toe. The *Draft Yosemite Valley Plan/SEIS* should clarify the need for and impacts of such a traffic check station in what is arguably an “exciting and rich habitat,” according to one person. Similarly, another person urges the National Park Service to abandon all plans to build a west Valley traffic check station because such a facility constitutes “intrusive and inappropriate development.” If a west Valley check station is built near El Capitan crossover, writes another, this facility should not sully the view from Taft Point.

605. Public Concern: The National Park Service should develop a comprehensive traffic management system for Yosemite Valley.

“Develop a complete traffic management system to lessen the impact of the vehicles in the Valley.” (Public Hearing, Costa Mesa, CA - #20310)

Response: The traveler information and traffic management system included in Alternatives 2, 3, 4, and 5 would manage the number of vehicles in Yosemite Valley and, potentially, the park so as not to exceed the capacity of parking areas and roads. A reservation system, or other means of allocating access, could be a component of this system and would be considered in the planning process. Development of the traveler information and traffic management system is beyond the scope of the *Yosemite Valley Plan*. It would be undertaken with further environmental compliance and public involvement after a Record of Decision for the *Yosemite Valley Plan* (see Vol. IA, Chapter 2, Introduction, Actions Common to All Alternatives – Traveler Information and Traffic Management).

Proposed traffic management efforts and in-Valley shuttles would be designed to allow visitors to find parking spaces efficiently, park their vehicles in one location, and travel throughout the Valley by a variety of means.

(Also see response to concern #354.)

373. Public Concern: The *Yosemite Valley Plan* should address how visitor response to private vehicle restrictions will affect traffic patterns in Yosemite Valley.

“Sociological considerations as they affect traffic do not seem to have been adequately addressed in the Plan. That is, how will people change their travel patterns when they are removed from their cars? Will they seek the lot closest

to where they are recreating? It is common sense that people may elect to park [at] lots closest to Yosemite Valley because they want to reduce travel time to and from their cars. The El Portal lot will be 20 minutes closer to Yosemite Valley than the Badger Pass lot and 12 minutes closer than the lot at South Landing. This is likely to make the El Portal lot the most used and therefore supports an argument for increasing parking there.” (Business, Yosemite National Park, CA - #3962)

Response: The effects of changing travel patterns into Yosemite Valley would be the subject of ongoing data collection and analysis at Yosemite National Park. The effects of providing out-of-Valley parking and shuttle service on the visitor's experience would be evaluated in conjunction with the traveler information and traffic management system. The traveler information and traffic management system could monitor the travel patterns of visitors and use various strategies to allocate access among parking areas when the demand is high. However, no decision has been reached regarding the use of reservations or other means of allocating access. The operational and policy details of the system would be defined during a subsequent planning process, which would include extensive opportunities for public involvement.

A sequencing plan, indicating the sequence and likely timing of actions, including elements of the traveler information and traffic management system, is presented in the *Final Yosemite Valley Plan/SEIS*. (Also see response to concern #605.)

324. Public Concern: The National Park Service should improve road signage in Yosemite Valley.

“Improved signage in the Valley will improve not only the seasonal/holiday traffic problems, but the overall enjoyment of the visitor’s experience as well. A huge reduction in cost will also result, new road signs vs. new roads and fleets of buses.” (Individual, San Jose, CA - #1323)

“Road signs are most confusing and stop signs are often hidden by trees or bushes. More stop signs.” (Individual, Yosemite National Park, CA - #5869)

“Put flashing red emergency lights and signs on Southside Drive that flash and warn drivers when emergency vehicles use Southside in the opposite direction. (Lights that only flash during an emergency—drivers are warned of on coming traffic.)” (Individual, Yosemite National Park, CA - #5898)

Response: National Park staff in Yosemite Valley is currently working to identify transportation improvements in the Valley, including better roadway signs identifying Valley activity areas, improvements to shuttle stops, and the clearing away of tree branches along the road for improved safety. Changes to visitor directional signs will continue to be examined. Specific roadway sign design or the placement of those signs throughout the Valley, however, is beyond the scope of the *Yosemite Valley Plan* and will be addressed in ongoing operational efforts and subsequent design and operational plans.

612. Public Concern: The *Yosemite Valley Plan* should prohibit the installation of traffic lights in Yosemite Valley.

“We don’t need stop lights in the Valley. I’d certainly hate to see that happen.” (Individual, San Francisco, CA - #67)

Response: Traffic management measures would be developed under the traveler information and traffic management system included in Alternatives 2 through 5. This system would manage the number of vehicles in Yosemite Valley and, potentially, through the park so as not to exceed the capacity of parking areas and roads. The *Final Yosemite Valley Plan/SEIS* would also reduce the number of parking spaces in the Valley and locate day-visitor parking in a single parking lot. Removing day-visitor parking from the Valley and implementing the traveler information and traffic management system would markedly reduce traffic congestion, in accordance with the goals of the 1980 *General Management Plan*. It is anticipated that by reducing traffic levels in the Valley, additional traffic control measures would not be necessary.



However, the operational details of traveler information and the traffic management system are beyond the scope of the *Final Yosemite Valley Plan/SEIS* and would be determined in subsequent planning processes.
(Also see response to concern #605.)

84. Public Concern: The *Yosemite Valley Plan* should address enforcement of parking regulations in Yosemite Valley.

“Would the day-use lot in Yosemite Village be completely free of vehicles by evening? How would this be enforced?” (Individual, Carmichael, CA - #30006)

Response: This concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan*. The traveler information and traffic management system would manage all traffic entering the east Valley and related parking. Use of day-visitor parking lots would vary by user; visitors on an extended day hike or day climb may return to a parking lot late in the evening, while other visitors may spend only a couple hours in the Valley. Enforcement of parking regulations would be required for the system to operate effectively, but the exact methods to be used would be determined subsequent to or concurrent with the traveler information and traffic management system.
(Also see response to concern #605.)

555. Public Concern: The *Yosemite Valley Plan* should ensure security for out-of-Valley parking lots.

“I believe parking lots outside of the Valley are fine for preserving the naturalness of the Valley floor. However, they should be well-policed for theft of automobiles and their contents.” (Individual, Woodland Hills, CA - #479)

Response: The National Park Service will address this operational issue to ensure the safety of visitors once the out-of-Valley parking lots are complete and used for Valley day visitors.

156. Public Concern: The *Yosemite Valley Plan* should establish reduced speed limits on Southside Drive.

“Instead of widening Southside Drive, the speed limit should be reduced. Southside Drive was, after all, designed for two-way traffic and only converted to one-way traffic in 1970.” (Individual, Oberlin, OH - #580)

Response: After adoption of the *Yosemite Valley Plan*, a detailed engineering study would be conducted for Southside Drive. This study would consider operational changes such as speed limits and physical improvements, including wider lanes and safety turnouts. Improvement of the roadway to accommodate 11-foot travel lanes and 2-foot shoulders on each side is the maximum extent of physical improvement that would be considered.

580. Public Concern: The National Park Service should hire additional law enforcement officers to enforce traffic laws in Yosemite National Park.

“Why not use the money to employ law enforcement to specifically enforce the traffic laws in Yosemite. If you do not believe that more traffic enforcement and better signs are needed, sit at the Sentinel Bridge intersection for just one hour on a Wednesday.” (Non-NPS Yosemite National Park Employee, Yosemite National Park, CA - #4827)

Response: This concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan*. Details of day-to-day park operations, such as levels of traffic law enforcement, are not relevant to the purpose and need or goals of the *Yosemite Valley Plan*. Each year, Yosemite National Park undergoes a park management priority setting process, including funding of operations such as law enforcement. Based on yearly priorities, a budget is established for each program area. It is not possible to fund all programs to the extent desired without an increase in the park’s annual operational budget.

Note: One response is provided for concerns #635 and #113, and is placed following concern #113.

635. Public Concern: The *Yosemite Valley Plan* should clarify the need for and impacts of a traffic check station near Taft Toe.

“Vague references are made in the Draft Plan. If this is simply a traffic check point in the middle of Southside Drive, it seems odd that in Table 4-72 the traffic check station is listed as having ‘moderate adverse’ biological impacts and ‘moderate adverse’ cultural impacts of ‘archeological deposits and a gathering area.’ If the ‘traffic check station’ is atop Southside Drive why would it have adverse effects on Native American sites, which presumably are off in the woods? Given that there have been no traffic diversions at the gates in about five years and given that visitation to Yosemite has declined since 1996, what is the impetus for such a ‘station?’ The ‘traffic check station,’ which must at minimum encompass 10 acres, is suspiciously close to the woods of Taft Toe, one of the most pristine sections of the Yosemite Valley floor. Not only is the Taft Toe locale an exciting and rich habitat because it encompasses major acreage, but it is a section with the ambience of seeming wilderness that is reminiscent of what it must have been like for John Muir. References also appear in the Draft Plan to ancillary structures for the ‘traffic check station.’ Something tells me this involves asphalt.” (Individual, San Francisco, CA - #30241)

Response: See response following concern #113 below.

113. Public Concern: The *Yosemite Valley Plan* should prohibit the construction of traffic check stations in west Yosemite Valley.

“Similar to the Taft Toe development, [constructing a traffic check station] brings intrusive and inappropriate development into the western Yosemite Valley. The indicated facility would be not unlike entrance facilities at amusement parks or racetracks. Its function appears limited to diverting day-use traffic from Yosemite Valley, once the available parking spaces for them are filled.” (Individual, Los Angeles, CA - #470)

Response: The traffic management station that may be developed at the El Capitan crossover would be an integral part of a traveler information and traffic management system that would be implemented as part of the *Yosemite Valley Plan*. The traveler information and traffic management system would be designed to provide visitors with the most accurate information possible regarding the real-time availability of parking and overnight accommodations in the Valley and in the rest of Yosemite National Park. Visitors would be informed when they arrived at park entrance stations, and potentially en-route to the park, of the availability of parking spaces for day visits in Yosemite Valley and the status of campgrounds and lodgings. Visitors would be informed of the most convenient locations to park and the shuttle services that would take them to destinations throughout the park. Incentives, such as reduced fees might be provided for visitors who choose to travel to the Valley on out-of-Valley shuttles.

Information would be provided to visitors along the routes they would take from the entrance stations to the out-of-Valley parking areas and on to Yosemite Valley. Visitors would be educated about the convenience of the shuttle service and other advantages so that those visitors who would be better served using shuttles would choose to do so without the need for a control point. The intent of the traveler information and traffic management system would be to minimize the number of visitors who would arrive at the El Capitan crossover without overnight reservations or without having a day-visitor parking space in the east end of the Valley.

If the incentives and visitor information elements of the traveler information and traffic management system are not successful in managing the number of vehicles that travel east of El Capitan crossover so as not to exceed the available parking, and if visitor traffic in the east end of the Valley results in congestion on the roads, only then would a traffic management station be constructed at the El Capitan crossover.

The function of the traffic management station proposed at El Capitan crossover would be to manage entries of all vehicles into the eastern portion of the Valley. Vehicles driven by visitors with overnight



accommodations as well as vehicles used by day visitors using dedicated parking spaces in the east Valley would be allowed to pass through the station. The station also would accommodate shuttle and tour bus vehicles as well as administrative traffic entering the Valley. Visitors without overnight accommodations would be directed to the closest available parking when in-Valley parking was full. The function of the traffic management station is to improve the ability of park staff to safely manage traffic and inform visitors of the choices they have for travel to the Valley when day visitor parking is full.

When the restricted access plan has been implemented, El Capitan crossover has been used as a checkpoint. The existing roadway layout and lack of facilities make the job of traffic control difficult and hazardous for park staff and visitors alike. Because there are not multiple lanes and a convenient means for visitors to turn around, all traffic frequently has been directed to leave the Valley, including visitors with overnight accommodations.

The traffic management station would be designed to provide the appropriate capacity to check vehicles, provide by-pass lanes for shuttles and to harmonize with the surrounding environment. This response also applies to concern #635. (Also see response to concern #605.)

603. Public Concern: The *Yosemite Valley Plan* should require that the El Capitan crossover traffic check station not be visible from Taft Point.

“Corresponding design principles should apply to the El Capitan crossover traffic check station. For example, the multiple lanes leading to the traffic check station should not be adjacent, but should be separated by strips of ‘forested and vegetated areas for screening.’ The plan should contain the design criterion that the resulting check station must not be visible from Taft Point (compare YVP, page 4.2-46).” (Individual, Oberlin, OH - #580)

Response: If built, the traffic check station proposed for El Capitan crossover is not expected to be visible from Glacier Point. The traffic check station may be visible from Taft Point. The proposed station is located to a great extent in a forested area and facilities associated with the check station would be minimal. The specific design of the check station, however, is beyond the scope of the *Final Yosemite Valley Plan/SEIS* and would be determined in subsequent planning processes. (Also see response to concern #113.)

4.13.7 ~ Vehicle Management

This subsection compiles comments regarding potential vehicle restrictions in Yosemite Valley. Comments include proposals for limiting day-use visitation through reservation systems and specific management for overnight vehicles.

4.13.7.a ~ General Management Direction

Proposed transportation plans inspire widely divergent concerns and solutions to congestion in Yosemite Valley, including proposals to limit access. One agency is concerned about the consequences that limits on vehicles in Yosemite National Park could have on nearby National Forest recreation sites. Among proposals to exclude or allow vehicles from the park lie scattered suggestions to try experimental no-car days in the Valley. One person asks for three days out of the year to experience “Yosemite like it was in the old days.” Another person makes “a pitch for extending the vehicle-free zone through the El Cap Meadow . . . to raise the water table in the meadow and help things thrive there.”

In contrast, other people feel strongly that automobile access must be retained in order to preserve a convenient, affordable, and individualized visitor experience. The convenience of private autos for people with disabilities, senior citizens, and families with children are important to many, especially hobbyists who need to bring “lots of gear.” Similar sentiments are reflected

in comments on mandatory public transportation discussed in Section 4.13.10 ~ Public Transportation.

Respondents suggest means other than limiting access to reduce the number of cars permitted to enter the park. One person demands a solution to the “intolerable auto situation.” Not convinced that Yosemite has a continual traffic congestion problem, many people comment that limits are only necessary during peak periods. Others suggest that it would be easier to limit vehicle access to early morning and late evening hours.

Although receptive to bus transportation, respondents recommend the use of alternative transportation solutions that reflect the seasonal fluctuations of vehicle traffic. A year-round transportation program might, one surmises, “discourage park visitation during the off season.” Rather than purchase a fleet of buses, one respondent asks, “couldn’t some buses be leased or rented for the busy summer season?”

Restrictions, some argue, are necessary for recreational vehicles. Such large vehicles, “should be banned,” declare many. Others say that recreational vehicles are not only hazards on the roads but they take up parking and block the view for other campers. One respondent suggests that “special arrival and departure hours for people with RVs” would help ease congestion on the roads.

One person protests the pass-thru fee policy: “A \$20 pass valid for seven days only angers those who need to get across the mountains and turns the road into the most expensive toll road I’ve ever seen.”

676. Public Concern: The *Yosemite Valley Plan* should address the impact of traffic reduction in Yosemite National Park on adjacent National Forests.

“Auto touring is currently the #1 recreation activity on National Forests. If use of private vehicles is reduced within the Park, adjacent National Forests are likely to see an increase. . . If waiting occurs at the entrance stations, nearby National Forest sites will be heavily impacted.” (USDA Forest Service, Sonora, CA - #9221)

Response: The action alternatives in the *Final Yosemite Valley Plan/SEIS* would affect auto touring opportunities for day visitors to Yosemite National Park only on the few miles of park roads east of the El Capitan crossover. Auto touring opportunities would continue to exist, with no restriction, on more than 110 miles of major park roads. There would be no change in the ability of visitors to travel through Yosemite National Park from one entrance to another.

Because of limited parking currently available at the major features in eastern Yosemite Valley, auto touring represents only a small portion of the visitor use in this portion of the Valley. Because of the unique features of the east Valley, there are no equivalent substitute experiences outside the park that those who would visit via auto touring could be expected to visit.

The minor impact on parkwide auto touring associated with the action alternatives and the relatively less important role of auto touring to visitation east of El Capitan crossover led to the conclusion that the proposed changes in vehicle access in the action alternatives would have no appreciable effect on auto touring or other recreational use outside Yosemite National Park.

The action alternatives include redevelopment of the park entrance stations to reduce existing queuing problems. It is expected that displacement of recreation use due to queuing at entrance stations would be reduced by the action alternatives in the Yosemite National Park.



143. Public Concern: The National Park Service should evaluate the feasibility of auto-free time periods in Yosemite Valley.

“I support auto-free time periods in the Valley. Cades Cove in Great Smokey Mountain National Park is auto-free until 10 AM each Saturday and Wednesday morning. The situation in Cades Cove is not precisely the same as that in Yosemite Valley, but the basic idea could be tested. For example, the El Capitan crossover traffic check station could prohibit cars from entering the upper Valley until 10 AM.” (Individual, Oberlin, OH - #580)

“I would like the Park Service to consider an experiment . . . where . . . at either the beginning or the end of the summer we create a special holiday with no cars in Yosemite, and you can go down as far as Tunnel View or maybe Bridalveil . . . And from therein, you walk in, and we can have three days a year where Yosemite is like it was in the old days.” (Public Hearing, Los Angeles, CA - #20339)

Response: The Preferred Alternative includes a traveler information and traffic management system that would manage the number of vehicles in Yosemite Valley and, potentially, the park so as not to exceed the capacity of parking areas and roads. The traveler information and traffic management system would not be used to limit travel through Yosemite. Because trips between the South Entrance and the Arch Rock, Big Oak Flat, and Tioga Road Entrances must travel through the west end of Yosemite Valley, it would not be possible to create auto-free time periods west of El Capitan Crossover. The operational details of the tools in the traveler information and traffic management system, including the possibility of prohibiting vehicle access to the east Valley during certain time periods, are beyond the scope of the *Yosemite Valley Plan*. The traveler information and traffic management system would be defined during a subsequent planning process that would include opportunities for public involvement.

256. Public Concern: The National Park Service should extend the vehicle free zone to the lower end of El Cap Meadows.

“I’d like to put in a pitch for extending the vehicle-free zone through the El Cap Meadow, the north side there. I think that would be spectacular and, in the process, be able to maybe lower the water table in the black oak woodland and raise it in the El Cap Meadow and help things thrive there, and help the pedestrians be happy there.” (Public Hearing, Sonora, CA - #20280)

Response: Extending the vehicle-free zone beyond El Capitan crossover west to Pohono Bridge was considered but dismissed for several reasons. In lieu of Northside Drive being available for vehicle use, several alterations to Southside Drive would be necessary, including the realignment of the Wawona Road/Southside Drive intersection and the replacement of Pohono Bridge to accommodate increased two-way traffic. The designation of the River Protection Overlay zone established in the *Merced River Plan/FEIS* would prohibit the realignment of Southside Drive at its intersection with the Wawona Road, which would be necessary to accommodate the increase in traffic associated with the closing of Northside Drive to vehicle traffic.

35. Public Concern: The *Yosemite Valley Plan* should not limit the number of vehicles allowed into Yosemite Valley.

“We are opposed to future restriction of private vehicle access into the Park. If this restriction is imposed it will profoundly restrict the disabled population and also families with seniors and young children. Many of the above population have personal needs that will be impossible to address on a crowded transit bus.” (Individual, Ahwahnee, CA - #20235)

“Despite being a life long conservationist and a Sierra Club member, I vastly prefer the opportunity to drive up and around Yosemite Valley in a car, from sight to sight. Please [leave] room for day visitors to drive in, around and all over the valley. Do not restrict visitors to those who arrive in a bus.” (Individual, San Francisco, CA - #148) “As a disabled, aging person I find myself being restricted to seeing what is readily visible from my private vehicle (much less to see). If I’m forced to ride a bus, I can’t come to the Park. Riding in a bus is not a viable option for me, and I suspect thousands of others.” (Individual, Mariposa, CA - 348)

“If we . . . see a deer in the bushes and decide to stop the car for a moment to take his picture or just watch him. Tell me how this is possible on a bus? If we decide to have a picnic lunch along the way what do we do, tell the bus driver stop here?” (Individual, Rolling Hills, CA - #1222)

“As a semi-professional photographer who carries lots of gear in my vehicle, I do not want to be forced to park outside the park and be bussed in. . . I realize you cannot single out photographers and give them an exemption as all visitors would claim they are photographers! . . . I feel that forcing me to leave gear in the vehicle in order to get on the bus would be unfair. I am voicing a strong opinion in favor of cars still being allowed in the valley.” (Individual, No Address, - #4950)

Response: The *Yosemite Valley Plan* would not ban private vehicles in the Valley. Most overnight visitors and many day visitors would be able to drive their private vehicles to designated parking areas in Yosemite Valley. After parking their vehicles, visitors would be able to travel to destinations in the Valley by shuttle bus, by walking, and by bicycle. The shuttle bus system would be accessible to people with disabilities and would operate frequently throughout Yosemite Valley.

The *Final Yosemite Valley Plan/SEIS* proposes to reduce vehicle traffic in the Valley to afford visitors a more nature-oriented experience that is less affected by the noise, pollution emissions, and visual presence of motorized vehicles. If visitors were allowed to drive throughout the Valley to any destination, traffic congestion would occur at the most popular destinations, and a greatly expanded number of parking spaces would be needed to accommodate vehicles at scattered destinations. Visitors enjoying the sights in the Valley would be affected by automobiles to an unacceptable extent. To achieve a more nature-oriented experience in Yosemite Valley, the Preferred Alternative would manage the number of vehicles traveling east of El Capitan Crossover to assure that the number of vehicles would not exceed the number of parking spaces. Under the Preferred Alternative, the existing one-way loop along Southside drive from Pohono Bridge, past Bridalveil Fall, across El Capitan Bridge and along Northside Drive to Valley View and Pohono Bridge would remain open to all visitor vehicles.

Special provisions may be made for people with disabilities who are unable to use the accessible shuttle bus system. Special provisions could include allowing people with disabilities to travel in private vehicles to some destinations (similar to current management of the Happy Isles Loop and Mirror Lake Roads) or the availability of electric carts or other special vehicles for people with disabilities.

45. Public Concern: The *Yosemite Valley Plan* should restrict the number of vehicles allowed into Yosemite National Park.

“Limit the number of cars permitted to enter the Park on any given day. All other later arrivals would be directed to outside parking areas from which the passengers would be taken by shuttle bus into the Valley. Other suggestions, although worthy ones, are considered far less important when compared to the intolerable auto situation.” (Individual, Whittier, CA - #127)

LIMIT NUMBER OF VEHICLES ALLOWED IN YOSEMITE VALLEY

“I strongly support the proposed plan’s call for a 60% reduction in the number of cars in Yosemite Valley. This is necessary to preserve the valley’s natural features and create a more positive experience for visitors there and should be supported.” (Individual, Inkster, MI - #425)

“Significantly reduce the number of cars that enter the Valley, with the objective of eliminating all private automobiles as in-Valley and out-of-Valley Transit systems are developed.” (Conservation Organization, San Francisco, CA - #4594)

“In my opinion, the Draft Yosemite Valley Plan doesn’t go quite far enough. I think that the only cars that should be allowed to have access to the Yosemite Valley are those used by the handicapped or the elderly. Everyone else should have to take a shuttle bus. Hopefully the model of bus chosen would be one of the quieter and less polluting varieties.” (Individual, San Diego, CA - #25)



PEAK HOURS

“The Draft Plan does a careful job of describing the influx and outflow of cars on peak days. It demonstrates that the primary problem lies with the large influx of day-use vehicles during the course of a summer day. Before and after peak hours, however, there would be no problem with allowing automobile access - the number of vehicles would not be that great in the early morning and late evening hours. We feel that a system restricting automobile access only during peak hours (such as that in use in Devil’s Postpile) would be easier to implement and inconvenience fewer park visitors.” (Recreational Organization, Washington, DC - #3800)

Response: The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* includes a traveler information and traffic management system that would manage the number of vehicles in Yosemite Valley, and potentially the park, so as not to exceed the capacity of parking areas and roads. On days when the number of vehicles is equal to or less than the capacity of the parking areas and roads, a set of management tools would be used to guide people to parking. During the period from November through March, parking for day visitors in Yosemite Valley is expected to be adequate to meet the demand. During the months with higher visitation levels, different management tools would be needed to guide people to available parking. The operational details of the tools in the traveler information and traffic management system are beyond the scope of this planning effort. The traveler information and traffic management system would be defined during a subsequent planning process and would include opportunities for public involvement. Banning all vehicles from Yosemite Valley was an alternative originally considered but was dismissed as described in Vol. IA, Chapter 2 of the *Final Yosemite Valley Plan/SEIS*.

36. Concern: The National Park Service should consider transportation alternatives which address the seasonal fluctuations in traffic volume.

“Traffic is a ‘seasonal’ problem in the Valley, and in fact throughout most of the year traffic is not an issue at all. Alternative 2 does not appear to address the seasonality of the traffic problem and in fact may discourage park visitation during the off season.” (Individual, Eugene, OR - #326)

RENT EXTRA BUSES DURING PEAK SEASONS

“I have experienced some terrible traffic problems in late May and early June, but not other times. . . Why purchase a whole fleet of buses that will probably not see much use 8 months out of the year? Couldn’t some buses be leased or rented for the busy summer season?” (Individual, Capitola, CA - #165)

ONLY LIMIT PRIVATE VEHICLES DURING PEAK SEASONS

“I simply do not see the need to mount an all-out attack on motor vehicle use. Under any plan there will come days when the threat of gridlock will require halting all Park access for a time. When this happens there is a twofold effect: (1) immediate drop in visitor access, and (2) a longer term, albeit temporary, drop in visitation. I believe it is better to shut the gates at times, rather than impose arbitrary restrictions all of the time.” (Individual, Riverside, CA - #121)

Response: The Preferred Alternative includes a traveler information and traffic management system that would manage the number of vehicles in Yosemite Valley and, potentially, the park so as not to exceed the capacity of parking areas and roads. On days when the number of cars is equal to or less than the capacity of the parking areas and roads, one set of management tools would be used to guide people to parking. During the period from November through March, parking for day visitors to Yosemite Valley is expected to be adequate to meet the demand. During these months, and during other times when visitation is lower than in the peak season, there would be no restrictions on vehicle access to Yosemite Valley. During the months with higher visitation, different management tools would be needed to guide people to available parking. The operational details of the tools in the traveler information and traffic management system are beyond the scope of the *Yosemite Valley Plan*. The traveler information and traffic

management system would be defined during a subsequent planning process, which would include opportunities for public involvement.

304. Public Concern: The *Yosemite Valley Plan* should restrict recreational vehicle use in Yosemite National Park.

BAN RECREATIONAL VEHICLES

“Certainly, all RVs should be banned.” (Individual, Aptos, CA - 3093)

“I do not think that park values should suffer because some. . . people choose to buy huge vehicles and clog our roads and make them unsafe. The simple solution is to ban such vehicles from the road. There are plenty of new vehicles which are small. . . All of ‘Today’s Vehicles’ do not find it difficult to use that road. Only the giant ones have trouble. Please protect the Park and do not grovel before giant SUV and Winnebago destroyer of the earth. Other places where these giant vehicles have an impact include: Parking places which are very large and take up valuable park land. Poor visibility for people near them (including bikes.) More pollution in the Park. Campgrounds dominated by vehicles blocking views and taking up valuable space.” (Individual, Stanford, CA - #2963)

RESTRICT ARRIVAL AND DEPARTURE TIMES HOURS FOR RECREATIONAL VEHICLES

“Establish special arrival and departure hours for people with RVs on a first-come first-served basis, to ease and regulate road traffic.” (Conservation Organization, Camarillo, CA - #2627)

Response: The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* includes development of a traveler information and traffic management system that would manage the number and types of vehicles in the Valley so as not to exceed capacity of parking areas and roads. Recreational vehicles would be addressed as part of this system. The traveler information and traffic management system would be developed subsequent to the Record of Decision for the *Yosemite Valley Plan*, and would include additional environmental compliance with ample opportunity for public involvement. Equal consideration would be given to all user groups addressed by the traffic management system.

718. Public Concern: The National Park Service should consider changing the thru-park fee policy for Yosemite National Park.

“The result of your fee policy is to penalize those of us who followed the pass-through rules. . . A \$20 pass valid for seven days only angers those who need to get across the mountains and turns the road into the most expensive toll road I’ve ever seen.” (Individual, Groveland, CA - #4787)

Response: This concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan*. The primary purpose of roads in parks is to provide access to the park for visitor enjoyment. Fees policy for Yosemite National Park is directed by the Secretary of Interior and Congress and, in part, in recognition of the purpose of park roads. Fee policy is set in Washington, D.C., to ensure uniformity of policy (such as fees on roads that cross parks) across the National Park System.

4.13.7.b ~ Day-visitor Vehicles and Day-visitor Reservations

Concerns regarding day-visitor vehicles are repeatedly connected to suggestions for day-visitor reservations as a means to reduce congestion in the Valley. A day-visitor reservation system, many people propose, could help limit cars and tour buses. One respondent perceives reservation systems as the first phase of vehicle restriction and asks when that might occur. Others state that the National Park Service should require all day visitors to use buses.



137. Public Concern: The *Yosemite Valley Plan* should establish a day-visitor reservation system in Yosemite Valley.

“We recommend a daily limit on cars and tour buses. We suggest that a reservation be made in advance to drive into the park and when the limit has been reached, no more vehicles should be allowed in for that day. This will require advance planning for the visitors but will help with congestion and pollution.” (Individual, Tehachapi, CA - #26)

“As a traffic management solution, day use automobile reservations would be vastly preferable.” (Individual, Long Beach, CA - #5644)

Response: The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* includes development of a traveler information and traffic management system that would manage the number of vehicles in Yosemite Valley and, potentially, the park so as not to exceed the capacity of parking areas and roads. Reservations or other means of allocating access would be considered in the planning process for the traveler information and traffic management system, which would include extensive public involvement. (Also see response to concerns #5 and #6.)

5. Public Concern: The *Yosemite Valley Plan* should clarify the implementation timeframe for the day-visitor reservation system.

“It appears that the day-use reservation system will be the first phase of any plan to restrict automobile traffic. What is a realistic time table for implementation of a day-use system?” (Individual, No Address - #30002)

Response: A day-visitor reservation system is not specifically called for in the *Final Yosemite Valley Plan/SEIS* and it is uncertain if and/or when a system would be developed or implemented. The *Final Yosemite Valley Plan/SEIS* Preferred Alternative calls for the design and implementation of a traveler information and traffic management system. This system would be implemented after a planning and environmental compliance process that would include extensive opportunities for public involvement. When the demand for visitor use is higher than the capacity of visitor facilities or park resources. The traveler information and traffic management system could use reservations as part of a strategy to equitably allocate access to areas in Yosemite National Park. However, no decision has been reached regarding the use of reservations or other means of allocating access.

A sequencing plan, indicating the sequence and likely timing of improvements, including elements of the traveler information and traffic management system, is presented as Vol. II, Appendix M in the *Final Yosemite Valley Plan/SEIS*.

6. Public Concern: The *Yosemite Valley Plan* should clarify the connection between the day-visitor reservation system and the campground reservation system.

“It appears that the day-use reservation system will be the first phase of any plan to restrict automobile traffic. . . How will it tie to your campground reservation system?” (Individual, No Address - #30002)

Response: The *Final Yosemite Valley Plan/SEIS* Preferred Alternative (Alternative 2) includes the design and implementation of a traveler information and traffic management system. The traveler information and traffic management system would be implemented after a planning and environmental compliance process that would include extensive opportunities for public involvement. The traveler information and traffic management system could use reservations as part of a strategy to equitably allocate access to areas in Yosemite National Park when the demand for visitor use is higher than the capacity of visitor facilities or park resources. However, no decision has been reached regarding the use of reservations or other means of allocating access. The traveler information and traffic management system would need to be coordinated with the parkwide campground and lodging reservation systems. In any case, visitors with camping or lodging reservations in Yosemite Valley would be able to drive to their accommodations without the need for additional Valley reservations.

253. Public Concern: The *Yosemite Valley Plan* should require day visitors to use buses to access Yosemite Valley.

“Require day visitors to use the buses to get in. Only overnight guests should drive in (for now).” (Individual, No Address - #1453)

Response: The *Final Yosemite Valley Plan/SEIS* considered but dismissed an alternative that would remove all private vehicles of day visitors from Yosemite Valley. Providing parking for all day visitors to Yosemite Valley in locations outside the Valley and requiring day visitors to ride shuttles to the Valley was also considered but dismissed. Serving all day visitors with shuttles from remote locations would require a large fleet of buses, large parking areas outside the Valley, and year-round operation of the system. The roads leading to the Valley from the north and the south traverse high elevations that are subject to heavy snows in the winter. Operating shuttle buses on these routes in the winter and keeping parking areas cleared of snow would be difficult and expensive. Potential winter road closures could keep some visitors away from their personal vehicles for extended periods, a potential safety hazard. The number of parking spaces provided in the Valley for day visitors is adequate to meet demand from November through March, when the heaviest snows occur. Day visitors in the peak season would use the same in-Valley parking provided, along with out-of-Valley parking.

4.13.7.c ~ Overnight Vehicles

The management of vehicle use for overnight stays concerns many individuals. People question whether vehicle restrictions for campers will also apply to overnight lodgers. Anyone staying overnight in the Valley, many assert, should be required to use alternative or public transportation during their stay. A system similar to the one used in Denali National Park, one person offers, could restrict vehicle traffic east of Taft Toe. Another person suggests windshield stickers to identify overnight vehicles that would remain parked until departure.

59. Public Concern: The *Yosemite Valley Plan* should clarify whether the travel restrictions for campers in Yosemite Valley also apply to overnight lodgers.

“I noticed that campers would have to park their cars when they arrive at campsites, and not use them again until they leave. Does this also apply to persons who will be staying at the Ahwahnee and Yosemite Lodge?” (Individual, Walnut Creek, CA - #84)

Response: The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* discusses parking for all visitors staying overnight in Yosemite Valley. Visitors to Yosemite Valley, whether staying for the day or overnight, would find parking only at lodging, camping, or day-visitor facilities. Parking would be eliminated from other Valley destinations (except, in the short term, for visitors with disabilities and appropriate parking permits).

136. Public Concern: The *Yosemite Valley Plan* should require overnight visitors to use public transportation in Yosemite Valley.

“Restrict campers from driving around during their stay other than to come to the campground upon arrival and to depart . . . No private vehicle travel after arrival.” (Individual, Fresno, CA - #291)

“Vehicles should be used only to enter and leave the park. . . Those staying in the Park whether camping or staying at Camp Curry or the Ahwahnee should walk, bike or take the public transport. Cars need to be parked until you leave.” (Individual, Redding, CA - #487)

“Campers should be allowed only entrance and exit privileges—no driving in [the] Park during their stay—same rule should apply to all lodgers (from tent cabins to the Ahwahnee): One entrance, one exit: everything [all travel] during stay [should be] on public transportation.” (Individual, Arroyo Grande, CA - #3555)



“The hotel people are the people that need their cars the least, and they should be provided valet-type experiences to move their cars out of the Valley because they don’t need them. . . So I would encourage external parking with shuttles and vans and valet-type experiences for the hotels.” (Public Hearing, San Diego, CA - #20434)

Response: The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* does not propose to restrict vehicle use by overnight visitors traveling to and from the Valley from locations outside the Valley. As for all visitors, travel within the Valley by overnight visitors would generally occur via shuttle buses or nonmotorized means, with the possible exception of people with disabilities. Refer to the transportation discussion under Alternative 2 in Vol. IA, Chapter 2, Alternatives, for additional information regarding use of shuttle buses by park visitors.

333. Public Concern: The *Yosemite Valley Plan* should restrict vehicle use east of Taft Toe for the purpose of accessing lodging.

“Transportation—Restrict the use of private vehicles in the Valley east of Taft Toe to entrance and exit only to your reserved place of lodge in. For example, if you are going to stay at Housekeeping, you are allowed to drive in on the day you arrive and park. You unload and leave your car unused until the day of your departure. Then you are allowed to load up again and depart directly to the West. This is the system that is currently in use in Denali National Park to reduce congestion on their one road and it works excellently. . . What about day trip to the high country? I would suggest that people plan them either before or after their Valley visit, or alternatively, use provided public transportation. . . Of course, it goes without saying that an adequate number of Valley shuttles would need to be provided for this plan to work.” (Individual, Palo Alto, CA - #3143)

Response: Restricting vehicle use in the Valley east of Taft Toe was considered. A ban on private vehicles in the Valley was found infeasible because of the high cost of providing year-round shuttle service to all Valley visitors. The size and cost of the required fleet of transit vehicles and parking facilities were considered unacceptable at the time.

Alternative 2, the Preferred Alternative in the *Final Yosemite Valley Plan/SEIS*, instead calls for limited parking in Yosemite Valley designed to meet the parking demand for the off-season months of November through March when visitation is relatively low. This would eliminate the need for costly shuttle service during the off-season. During the peak season, visitors traveling to the Valley in private vehicles would be directed to parking areas at their overnight accommodations or at the designated day-visitor parking area. Once parked, visitors would travel by shuttle or by nonmotorized means to activity areas in the Valley. In order to discourage travel in the Valley by private vehicles, no parking would be available at the activity areas. Day visitors who didn’t park in the Valley would arrive by shuttle bus from parking areas outside the Valley. As a result, a balance of access by shuttle buses and by private vehicles would be provided for day visitors in the peak season. (See the description of Alternative 2 in Vol. IA, Chapter 2 of the *Final Yosemite Valley Plan/SEIS*.)

514. Public Concern: The *Yosemite Valley Plan* should institute a windshield sticker system indicating each vehicle’s Yosemite Valley destination.

“Why not consider attachment of windshield stickers at entrances specifying Valley destination. Cars would not be allowed to leave destination parking until date of departure except for specially arranged day trips (i.e. Wawona, Glacier Point, etc.). All travel after arrival in the Valley to be by foot or shuttle bus.” (Individual, San Francisco, CA - #2811)

Response: The Preferred Alternative of the *Final Yosemite Valley Plan/SEIS* includes a traveler information and traffic management system that would manage the number of vehicles in Yosemite Valley and, potentially, the park so as not to exceed the capacity of parking areas and roads. Window stickers or other means of allocating access would be considered in the planning process for the traveler information and traffic management system.

4.13.8 ~ Employee Transportation

Transportation for employees is also addressed in Park Operations under Section 3.16.2 ~ Employee Housing. This section contains a few comments that address the space taken by employee vehicles. One respondent asks that an analysis of the benefits of moving employees out of the Valley and providing a shuttle system for them be included in the *Final Yosemite Valley Plan/SEIS*. Employees working early and late shifts would be better served, another person suggests, by smaller shuttles “to ensure that out-of-Valley employees can reach work via regional transit rather than private automobiles.”

714. Public Concern: The *Yosemite Valley Plan* should establish shuttle transportation for employees who live outside Yosemite Valley.

“You estimate that there are about 800 day use parking spaces . . . in the Valley. It’s easy to envision many of these spaces occupied by the cars of resident and commuting employees, as you estimate that there are over 1300 of them. How much of the parking problem that dominates your alternatives would be alleviated by relocating some employees and their vehicles to out-of-Valley communities and providing adequate transport from their new abodes back to the Valley? Your analysis is vague on this most crucial point.” (Individual, Oakland, CA - #3835)

USE SMALL SHUTTLE VEHICLES

“Our organizations do not believe . . . that the employee transportation system should be so dependent on large buses that late-night and early morning shift workers can not be included. By incorporating jitneys and smaller shuttle vans into the fleet and the TMS, we hope the Park Service can ensure that out-of-Valley employees can reach work via regional transit rather than private automobiles.” (Conservation Organization, San Francisco, CA - #4594)

Response: Employee transportation is an important component of the *Yosemite Valley Plan* transportation system. The *Yosemite Valley Plan* calls for the development of an employee transportation system to reduce the number of vehicles commuting into the Valley and therefore the amount of employee parking needed. It is expected that some employees would continue to drive private vehicles when working off-hours when the operation of transit service is not feasible.

Currently the park and the Yosemite Regional Transportation System (YARTS) are working together to encourage the use of a voluntary demonstration regional transit system although this system does not meet the needs of all commuters. Specific operating characteristics of the employee transportation system are beyond the scope of the *Yosemite Valley Plan* and would be addressed as part of a comprehensive operational plan for employee transportation into the Valley.

4.13.9 ~ Alternative Transportation and Fuels

Members of the public note that there are a variety of alternatives to using diesel buses or private autos. Comments in this section discuss the merits of various methods of transportation and make suggestions to incorporate them in the transportation plan.

4.13.9.a ~ Alternative Transportation

Although acceptance of required public transportation is common, many people want the National Park Service to explore other transportation options because of pollution caused by “the proposed diesel bus invasion.” They offer a multitude of suggestions:

- Electric buses
- Electric trains
- Natural gas vehicles



- Bicycles
- Horses and Carts
- Golf carts
- Gondolas
- Blimps
- People-powered shuttles

Others express concerns about the use of alternative transportation. Conflict between buses and other types of transportation—such as bicycles—must be expected, states one person. Many who comment include recommendations that shuttle buses be able to accommodate the transport of bicycles to out-of-Valley destinations. Although some respondents suggest light rail, others specifically request restoration of the Yosemite Valley Railroad in order to include the use of regional transportation to Merced.

“The Park Service refuses to consider a rail option . . . while much of California is turning to rail for environmentally sound travel,” claims an individual who declares it imperative that the park planners assess this alternative. “Rather than a parade of diesel-spewing buses roaring by every few minutes, a train could arrive every hour leaving the park in peace the rest of the time,” states another rail proponent.

The environmental benefits of monorails or trams from Glacier Point to other locations in the park, some suggest, make up for the visual impact of towers and lines. Further benefits could be realized, notes one person, by a solar monorail. With goodwill in mind, one person would like the Park Service to establish a car pool system. “Parking areas might be set up,” they assert, “by states, countries, etc., so that tourists can choose to go with someone from their own ‘neck of the woods’ or a foreign country.”

41. Public Concern: The *Yosemite Valley Plan* should establish low-impact transportation alternatives for Yosemite Valley.

“The technical reasons for continuing diesel bus use are clear; however it would be helpful to have a commitment to exploring other options as technology changes. Has the Park Service considered attempting a major initiative with the transportation industry to develop low impact transportation systems for wide-spread use?” (Individual, Athens, OH - #37)

ELECTRIC BUSES

“One thing I’d like to add: if it’s possible could you please run electric busses in the Valley? I find the constant roaring drone of the buses to be hard to get away from, no matter how high you hike above the Valley floor.” (Individual, No Address - #30089)

“Diesel shuttle buses? Are you nuts? They are loud, obnoxious, and they stink. Wait until you have some fuel cell/electric prototypes in hand, and try them for a while before committing to a major upheaval of the transportation system.” (Individual, San Jose, CA - #30088)

“The SEIS rejected the concept of operating electric shuttle buses to and from the Valley because current battery technology does not meet operation requirements and the cost exceeds diesel service. . . Considering the 20 years (from the 1980 *General Management Plan*) it has taken to reach this draft planning phase, the out-of-hand rejection of cleaner bus operations seems short sighted . . . The Plan should encourage the use of cleaner energy buses both in and out of the Valley by identifying them as environmentally superior choices.” (Individual, Union City, CA - #4404)

ELECTRIC TRAIN

“Would an electric train be environmentally sound coming up the Merced along the old RR bed? For use of day visitors. It would help road traffic.” (Individual, Lakewood, CA - #30066)

“Build a train/monorail line that goes around the loop and stops often for people to get on and off and runs every 10 minutes during the peak season. The train can be powered by hydroelectric power from the Hetch Hetchy dam.” (Individual, FPO AP - #403)

NATURAL GAS VEHICLES

“I am also concerned to hear of the proposal for 231 new diesel buses per day. While it is laudable to reduce private car trips in favor of mass transit, diesel buses are serious polluters and the Park Service should consider alternatives such as natural gas-powered vehicles.” (Individual, Berkeley, CA - #257)

BICYCLES

“I hope you will consider the important role that bicycling could play in terms of both enhancing the visitor experience and preserving the natural environment . . . To maximize bicycling’s potential in Yosemite Valley, I urge you to take the following steps: Offer free community bikes to all park visitors at transfer facilities as an inexpensive, fun and healthy complement to walking and the valley shuttle. Ensure sufficient lane width on Southside Drive so that drivers of cars, SUV’s, buses and RV’s can safely share the road with bicyclists. Convert Northside Drive to a multi-use facility for non-motorized transportation. Construct a separate Class I path for novice riders near Southside Drive, with design treatment as secondary roadways at all intersections. Install secure bicycle parking at all trailheads. Allow bike access to shared trails where appropriate. Provide bicycle carriage devices on transit and shuttle systems.” (Individual, Los Angeles, CA - #110)

“I would suggest that the bike paths circumnavigate the entire Valley and that there be several types of bikes available including the three wheel variety and the four wheel variety. Having a variety of bikes available would make it possible for visitors of varying ability to use the bicycles to tour the valley and carry their picnic baskets and other amenities—giving patrons the ability to travel throughout the valley without having to adhere to bus schedules and the problem of on and off loading.” (Recreational Organization, Oakland, CA - #495)

HORSES AND CARTS

“Maybe as one part of the solution, you could get area ranchers to contract with you to be there at certain hours daily to take people in. Horseback or carts. You could say, hey, see it the ‘old fashioned way.’ You could make the ranchers carry insurance and contract with them on a renewable basis. (It is hard to think of too many horses in an area.) Now not all people will want to do this, but a fair amount will. You can get some good fees from the ranchers, say like a straight 70%-30% split or 75-25 ranchers of course getting the lion’s share. I believe it would help to raise money for the Park.” (Individual, Olympia, WA - #3173)

GOLF CARTS

“I feel it is the Southside Road that should be closed to bus and vehicle traffic as this is the most scenic for pedestrians and bikers. Electric small golf cart type vehicles could be available for families and one lane provided for these. They are very quiet.” (Individual, North Fork, CA - #6377)

GONDOLAS

“Our personal preference would have been 4-seat closed gondolas connecting the Valley with both the Foresta area and an area near Glacier Point. Gondolas with handicap access could move large numbers of visitors with minimal impact on wildlife, air quality and the scenic values of the Park. Camouflaged among trees and crevices, gondolas are by far the most silent, energy efficient and non-polluting form of transportation. . . A railroad is sometimes proposed by environmentally sensitive people. This would involve as much physical disruption, noise and impact on wildlife as a road. . . No alternative has the efficiency of gondolas in moving people up and down a mountain with minimum impact.” (Individual, Sonora, CA - #2974)



BLIMPS

“It doesn’t make sense to increase buses and reduce autos. Currently there are enough buses on highway 41. . . [buses] also produce pollution and are not designed for curved mountain roads. . . Perhaps in the future using blimps (airships) would be a welcome alternative.” (Individual, Fish Camp, CA - #2247)

PEOPLE-POWERED SHUTTLES

“I feel it is time for people-powered shuttles in the Valley. Since the Valley is so flat, tremendous amounts of horsepower don’t seem needed. I would like to see buses in the valley that have a set of pedals at every seat. . . All pedals would be connected to a main drive shaft and an employee would steer.” (Individual, Wilton, CA - #5488)

Response: The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* proposes the use of rubber-tired transit technology to transport visitors to the Valley from out-of-Valley parking areas as well as transporting visitors within the Valley. Other technologies were considered but dismissed because of high costs and the potential for significant environmental impacts from construction. Fixed guideway transit systems would cost \$10 to \$20 million per mile for at-grade systems, with elevated systems costing up to three times more. In the case of elevated systems (such as monorail), light rail (which is powered by overhead electric wires), and gondola transit (which is propelled using a cable drawn by electric or other types of motors along an aerial guideway), the visual impacts of the systems caused them to be dismissed. Most fixed guideway transit technologies would not be feasible to transport visitors into the Valley because of the steep grades that must be crossed. Specialized transit systems, like cog railways and cable-suspended transit, might be feasible, but they would be very expensive, would require new construction in undisturbed areas, and they could be visually disruptive. Human powered transit and blimps were dismissed because they have not been proven to be feasible for the type of service needed in Yosemite. Horse-powered transportation was dismissed due its incompatibility with motorized transportation on roads, low speed, and low capacity. Bus systems would take advantage of the existing roads in the park and allow service to be modified as required during the day and over the course of the year. See Vol. IA, Chapter 2, Alternatives, Alternatives Considered but Dismissed, for additional information regarding rail transit options.

Developing transit systems outside the park, such as restoring the Yosemite Valley Railroad, is beyond the scope of the *Yosemite Valley Plan*. This planning effort does not preclude other agencies and organizations from developing new transportation facilities to bring visitors to the park. The proposed system of shuttle buses from El Portal to the Valley could serve passengers arriving on a new railroad if outside agencies develop such a project.

The emission analysis shows that annual emissions of volatile organic compounds, carbon monoxide, sulfur dioxide, and particulate matter less than 10 microns in size would be reduced under the Preferred Alternative, using diesel engine technology, as well as with alternative fuels. The use of diesel technology for the shuttle bus fleets would slightly increase compounds of nitrogen oxide emissions compared to the No Action Alternative. For some pollutants, such as carbon monoxide, diesel technology would reduce emissions compared to compressed natural gas or propane engines. Proposed regulations regarding diesel fuel composition and diesel engine emissions reductions could substantially reduce emissions from diesel powered shuttle buses after 2007.

The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* does not prescribe or preclude the use of specific engine technologies or propulsion systems for shuttles operating in Yosemite Valley or shuttles serving out-of-Valley parking lots. When shuttle services are implemented, Yosemite National Park would select buses with the required operating characteristics and features that offer the lowest possible pollutant and noise emissions that provide reliable service in heavy daily use at an affordable cost.

The federal government, through the Department of Energy, has several programs aimed at the development of alternative fuel technologies. The DOE's Office of Transportation Technologies manages these programs. The programs study the viability of replacing conventional fuels (diesel and gasoline) with alternative fuels, reducing dependence on foreign petroleum and reducing pollutant emissions. The National Park Service has a mandate to use clean technology whenever feasible.

A major consideration in selecting engine and propulsion technology now and in the future is the availability of alternative fuels. There is no practical and economically viable means of obtaining natural gas in Yosemite National Park. Developing natural gas delivery facilities for the park is beyond the scope of the *Yosemite Valley Plan* and beyond the capabilities of the National Park Service.

Yosemite has several battery-electric buses in the fleet of Valley shuttles. These buses have been placed in service in Yosemite Valley as a result of demonstration programs. There have been numerous challenges with the electric buses, including unreliable operation, short operating range, and low passenger-carrying capacity. Current battery technology does not allow adequate energy to be stored on board buses to support all-day service with fully loaded, full-size transit buses. Quick-charging technology may address some of the problems with battery-electric buses, but at present, this technology is considered inappropriate for the requirements of the shuttle systems serving Yosemite Valley.

Fuel-cell technology is being developed for buses. Vehicles are not expected to be commercially available within the next five years. The resource and visitor experience benefits of the Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* are considered to be of significant value. Waiting for the uncertain availability of new transit propulsion technologies would delay those benefits. As new and better transit bus technology becomes available, the park can upgrade and improve the transit system.

The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* presents emissions impacts for the following transit propulsion and fuel systems: diesel internal combustion engine, compressed natural gas internal combustion engine, propane internal combustion engine, and fuel cell with electric motors. Other propulsion technologies, such as hybrids with internal combustion engines and electric motors may be appropriate for use in Yosemite.

Different bus technologies may be selected for the in-Valley and out-of-Valley shuttles because of the different operating environments of the two types of shuttles. The fleet would be upgraded over time when feasible to use the cleanest and quietest available technology.

The National Park Service has committed in Vol. IA, Chapter 1 of the *Final Yosemite Valley Plan/SEIS* to continue strategies to implement technologies that reduce mobile sources of air pollution.

The Preferred Alternative (Alternative 2) in the *Final Yosemite Valley Plan/SEIS* substantially expands the facilities available for bicycle use. Northside Drive is proposed to be converted to a multi-use trail for use by bicyclists and walkers. New multi-use trails are proposed elsewhere in the Valley. Because of topography, developing multi-use trails separate from the existing roadways is difficult west of El Capitan crossover on the north and south sides of the Merced River.

Bicycles are currently available for rent in the Valley. Alternative 2 proposes to provide bicycle rental facilities near the in-Valley parking area for day visitors and the transit hub. Transit buses serving as Valley shuttles and the out-of-Valley shuttle fleet would be equipped to carrying bicycles, perhaps using front and/or rear mounted bike carriers that have been proven in urban use. Providing loaner bicycles for use without charge would be an operational decision that is beyond the scope of the *Yosemite Valley Plan*.



271. Public Concern: The *Yosemite Valley Plan* should address the potential safety hazards of bicycle traffic in Yosemite Valley.

“Undoubtedly, there will be conflict; conflict, that’s a technical term. Conflict is when the car runs over the bicycle. We need to address this issue in our plans. Eventually one of the shuttle buses is going to be involved in conflict. Undoubtedly, there will be a lawsuit. We need to plan for that too.” (Public Hearing, Oakland, CA - #20128)

Response: Bicycle safety in the Valley is an important aspect of the transportation system in the *Final Yosemite Valley Plan/SEIS*. Today bicycles are allowed only on the 12 miles of multi-use paved trails and roads in Yosemite Valley. All of these multi-use trails are shared with hikers, and a few small segments are also shared with horseback riders. No bicycle trails exist in the west Valley, and bicycles must share the narrow and often crowded Northside and Southside Drives with motor vehicles.

Alternatives 2, 3, 4, and 5 of the *Final Yosemite Valley Plan/SEIS* address the need to reduce the level of conflict among bicycles, vehicles, pedestrians, and horseback riders. All alternatives call for the conversion of Northside Drive (one lane in Alternative 5) to a multi-use paved trail, which would be closed to vehicles, and a new multi-use paved trail adjacent to Southside Drive between Swinging Bridge and El Capitan crossover would be constructed. These designated paved trails would allow safe and convenient bicycle access to the west Valley. Visitors would be able to access major Valley attractions and numerous recreational sites without the risk of conflict with Valley traffic.

272. Public Concern: The *Yosemite Valley Plan* should address the need for bicycle shuttle services.

“Now, later on in the afternoon, these same cyclists, let’s say all of them, are going to want to expand their beautiful visit to the Valley Floor, so they’re going to say, ‘Shoot, we’ll just take the bus back up the hill.’ So there’s going to be a big spike in people late in the afternoon wanting to haul their bicycles back up the hill. Now, undoubtedly, these shuttle buses are going to have bumper racks; these bumper racks hold what, three or four? Well, we need to be concerned about this spike in bicycle hauling in our planning.” (Public Hearing, Oakland, CA - #20128)

Response: Bicycle transportation in the Valley is an important component of the transportation system. The *Final Yosemite Valley Plan/SEIS* alternatives include the expansion of bicycle and pedestrian paths throughout the Valley and the retention of bicycle rentals in the Valley. Bicycle parking facilities would be developed as part of the Valley area site design.

With the implementation of out-of-Valley parking areas, the transport of bicycles aboard the shuttle system is important. Out-of Valley shuttle buses would be equipped with bicycle racks. However, the details of this issue would be examined in the operational plan for out-of-Valley shuttle service during scheduling, and in the procurement of shuttle vehicles. The accommodation of bicycles and the potential increases in ridership at certain times of day are aspects of service that would be examined in the operational planning phase but are beyond the scope of the *Yosemite Valley Plan*.

60. Public Concern: The *Yosemite Valley Plan* should require restoration of the Yosemite Valley Railroad.

“Have you considered restoring the Yosemite Valley Railroad between Merced and El Portal? This would allow visitors to use Amtrak to get to Merced and transfer seamlessly to the YVRR. . . Visitors arriving by car would find more parking available at Merced than at El Portal.” (Individual, Walnut Creek, CA - #16)

Response: This concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan*. The Yosemite Valley Railroad was located in the Merced River Canyon and ended at El Portal. Re-establishing the railroad would entail transportation improvements exclusively outside the boundaries of Yosemite National Park. None of the proposed alternatives in the *Final Yosemite Valley Plan/SEIS* would preclude restoration of the Yosemite Valley Railroad by entities outside the National Park Service.

418. Public Concern: The *Yosemite Valley Plan* should include an analysis of rail transportation.

“The YVP simply is not finished until a rail analysis is completed. The entirely appropriate issue of rail to the Park has been dismissed with no alignment study, no sort of cost estimate and no consideration of appropriate technology for such a service. . . We propose a new ‘Yosemite Railroad.’ Not only would rail service be faster than the proposed diesel bus invasion of the park, but would dramatically reduce pollution inside the Park. Mobile source emission is a major issue in Yosemite, which appears to be completely ignored, or exacerbated in the YVP. Sierra’s proposal includes the use of locomotives using liquid natural gas (LNG), a proven technology readily available. LNG eliminates up to 99% of the emissions of equivalent diesel powered engines. Unlike compressed natural gas, the fuel is highly stable and relatively easy to store. And unlike any sort of electric technology, it has the horsepower necessary to climb the grades going into the park. Sierra is building a LNG conversion facility in Oakdale. A single LNG-fueled train can carry up to 1200 passengers in comfort in d-3 hours from Riverbank (this is as at least as fast as someone could drive by car). Rather than a parade of diesel-spewing buses roaring by every few minutes, a train could arrive every hour leaving the park in peace the rest of the time.” (Business, Oakdale, CA - #4495)

“In about six pounds and something like 1,600 pages of *Draft Yosemite Valley Plan*, the Park Service refuses to consider a rail option. This head-in-the-sand approach to ‘planning’ comes while much of California is turning to rail for environmentally sound travel. . . Its time for the National Park Service in Yosemite to look to the future and get on track by considering rail now as a viable alternative.” (Individual, San Francisco, CA - #30241)

Response: The development of new transportation systems to bring visitors to Yosemite National Park from remote out-of-park locations is outside the scope of this planning effort. The *Yosemite Valley Plan* would not preclude organizations other than the National Park Service from developing new transportation systems, including rail lines, to the park. Rail lines have never operated into Yosemite Valley, most likely because there is no economically viable, technically feasible route for trains to follow across the difficult terrain that leads to the Valley from all directions. See Vol. IA, Chapter 2, Alternatives Considered but Dismissed, in the *Final Yosemite Valley Plan/SEIS* for a discussion of the consideration of rail transit options.

Rail transportation was considered as an option for transporting visitors from out-of-Valley parking areas into the Valley. Rail technology was dismissed because of the high cost of developing new rail lines, because standard rail technology cannot be used on grades as steep as those leading into Yosemite Valley, and because the construction of new rail lines would cause disturbance to currently undeveloped land along the entire route of the rail line. In addition, train locomotives, whether powered by diesel or natural gas, are substantially noisier than buses. Electrically powered rail technology, such as that used in the Swiss mountain railway system could have acceptable noise characteristics, but the overhead electric lines would be visually disruptive. Rail technology also was considered for transit service within the Valley, but it was dismissed due to high costs, the need to disturb additional land, and the visual impacts of overhead electric lines.

While air quality in Yosemite National Park is very important, the pollution levels in the park are generally caused by importation of pollutants from other areas, not by mobile source emissions originating in the park.

(Also see response to concern # 41.)

320. Public Concern: The National Park Service should build a tram from Yosemite Valley to Glacier Point.

“We should face and consider some travel facilities which will serve and reserve though now despised. This may include: A tram which will pick up near Vernal Falls and proceed quite well out of sight up Illilouette to Glacier Point, and with no ground access except at top and bottom. This will eliminate most of the urge to have a private car on the Floor.” (Individual, San Rafael, CA - #1609)



Response: Developing a tram from the floor of Yosemite Valley to Glacier Point has been considered in the past. Such a tram would provide an alternative means of traveling to Glacier Point from the Valley in addition to the options of private vehicle transportation and travel on concession-operated buses that are available today. The tram would probably be viewed as a recreational attraction by visitors, rather than as a means of transportation between the two locations. There is no evidence that adding such an attraction would reduce the demand for travel by private vehicles to the Valley, because Glacier Point is not on any of the direct approach routes to the Valley and because parking at Glacier Point is extremely limited. Developing such a tram could marginally reduce the demand for travel by private vehicles to Glacier Point, but this would be achieved at the cost of increasing the demand for parking in Yosemite Valley.

344. Public Concern: The National Park Service should build a monorail from Glacier Point to Wawona.

“We should face and consider some travel facilities which will serve and reserve though now despised. This may include a monorail suspended from inconspicuous supports through beautiful back country from Glacier Point to Wawona and thence on through back country to and through Mariposa Big Trees, with no access to the ground after leaving Wawona.” (Individual, San Rafael, CA - #1609)

“We would like to support a solution of a solar powered monorail system. Yes the overhead power lines would have some visual impacts . . . [but people won’t mind] knowing that this progressive transit system provides cleaner air and water to this precious resource. If the batteries in the winter time are not sufficient, then we could use fuel but this would only be the exception not the rule.” (Individual, Malibu, CA - #3832)

Response: Developing a monorail or other conveyance between Glacier Point and Wawona or between any of the locations outside Yosemite Valley is beyond the scope of the Yosemite Valley planning effort. (Also see Vol. IA, Chapter 2, Alternatives Considered but Dismissed, in the *Final Yosemite Valley Plan/SEIS* for a discussion of monorail and other rail transit options.)

1. Public Concern: The *Yosemite Valley Plan* should establish a car-pool system for Yosemite National Park visitors.

“An idea for a possible alternative or one in conjunction with YARTS would be to promote voluntary state or country car-pooling or a mix of state/country. Since Yosemite is a melting pot of people from all over the world this would be a great opportunity for people to come together to see and help preserve a national treasure at the same time in one vehicle rather than 2 or 3. Possibly an entry discount could be offered or some other small reward as an incentive. Parking areas might be set up by states, countries etc. so that tourists can choose to go with someone from their own ‘neck of the woods’ or a foreign country to learn/promote the good ol’ USA etc.” (Individual, Auburn, PA - #4)

Response: This concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan*. Parkwide transportation solutions would be evaluated subsequent to the *Yosemite Valley Plan* through a traveler information and traffic management system, which would include a separate public involvement process and environmental compliance.

4.13.9.b ~ Alternative Fuels

People are largely adverse to any increase in vehicles that use diesel fuel in Yosemite National Park. In addition to alternative transportation, many people espouse the use of alternative fuels. One person would like to impose vehicle limits with exceptions for users of alternative fuels. A fee structure based on fuel types, another offers, would make “positive results much more likely.” Another responds that any bus system “should use the cleanest and quietest proven technology.” In order to keep up with clean fuel technology one person advises the Plan call for hiring a “consultant to determine the best ‘mix’ of alternative fuel vehicles for Yosemite’s own

use.” A number of people call for the *Yosemite Valley Plan* to “clearly establish specific goals and targets to minimize and reduce use of existing diesel technology.” A respondent points out that the five-year implementation time frame for the plan leaves plenty of room for technological development and the *Yosemite Valley Plan* “should not rule out the possibility of alternative forms of public transportation.” Many respondents request that the *Final Yosemite Valley Plan* should “contain a specific implementation plan to move toward the use of the cleanest and quietest transit vehicles.”

223. Public Concern: The National Park Service should allow special provisions for clean air vehicle users in Yosemite Valley.

“All I would propose is that in limiting the number of vehicles in the Valley, during the peak seasons, that there be some sort of provision allowing an exemption for the cleanest air vehicles mostly as a perk for . . . drivers, as we’re trying to build . . . reasons for people to get these vehicles, but also as say a PR thing for the Park to show their support of the clean air vehicles.” (Public Hearing, Costa Mesa, CA - #20300)

Response: The Preferred Alternative of the *Final Yosemite Valley Plan/SEIS* includes the implementation of a traveler information and traffic management system that would manage the number of vehicles in Yosemite Valley so as not to exceed the capacity of parking areas and roads. Reservations or other means of managing access, such as the use of incentives, would be considered in the future planning process for the traveler information and traffic management system. However, the operational and policy details of the system are beyond the scope of the *Yosemite Valley Plan* and therefore would be defined during a subsequent planning process that would include extensive opportunities for public involvement.

521. Public Concern: The *Yosemite Valley Plan* should require differential fees for vehicles entering Yosemite National Park based on fuel types.

“To ensure that the ‘cleanest’ diesel is used for the shortest period of time, the Park Service should commit to using differential fees for incoming cars, buses, and trucks, depending on fuel types.” (Conservation Organization, San Francisco, CA - #4594)

“[Charge] higher fees for cars that pollute more (big SUVs and older cars) and lower ones for cars that don’t (electric cars). There are plenty of capable economists who could help determine how best to utilize such an approach. I would be happy to help identify such economists for such an effort. The best part about such an approach is that it would not be too drastic and positive results are much more likely.” (Individual, Torrance, CA - #6421)

Response: This concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan*. The Preferred Alternative of the *Final Yosemite Valley Plan/SEIS* includes the implementation of a traveler information and traffic management system that would manage the number of vehicles in Yosemite Valley (and potentially the park) so as not to exceed the capacity of parking areas and roads. Reservations or other means of allocating access, the use of incentives for parking or fuel type, and other matters would be considered in the planning process for the traveler information and traffic management system. Operational and policy details of the system are beyond the scope of the *Yosemite Valley Plan* and would be defined during a subsequent planning process, which would include extensive opportunities for public input.



Note: One response is provided for concerns #516, #522, #296, and #295, and is placed following concern #295.

516. Public Concern: The *Yosemite Valley Plan* should require the National Park Service to replace its motor vehicle fleet with fuel efficient, low polluting vehicles.

“The YVP should also require the Park Service to replace its motor vehicle and motorized equipment fleets (including 4x4s, PWC, snowmobiles, automobiles, trucks, lawn and garden equipment, etc.) upon retirement, with only the most fuel efficient and lowest polluting equipment. Fuel-efficient technologies are highly correlated with lower emission levels, causing less smog and less global warming gases. Increased fuel efficiency will also reduce the NPS gasoline budget, saving money for other important uses. Automobile and snowmobile technology have seen dramatic advancements in the last several years, and moving to cleaner and greener fleets would encourage manufacturers to develop additional improvements. Furthermore, this move would help the Park Service better ensure that Park resources (such as air and water quality) are left unimpaired, while setting an important example and increasing agency credibility with the public.” (Conservation Organization, San Francisco, CA - #4594)

“The valley shuttle bus system should use the cleanest and quietest proven technology.” (Business, San Francisco, CA - #2974)

Response: See response following concern #295 below.

522. Public Concern: The *Yosemite Valley Plan* should require the hiring of an alternative fuel consultant.

“The final plan should also provide for the hiring of a consultant to determine the best ‘mix’ of alternative fuel vehicles for Yosemite’s own use, to take other affirmative steps to stay informed about new technology, and to help achieve a clean, quiet, efficient fleet of satellite lot transit within the next five years.” (Conservation Organization, San Francisco, CA - #4594)

Response: See response following concern #295 below.

296. Public Concern: The *Yosemite Valley Plan* should establish specific goals and targets for reducing use of current diesel technology.

“The Plan should clearly establish specific goals and targets to minimize and reduce use of existing diesel technology. Specifically with regard to the air quality impacts of diesel buses, more detail is needed in the Plan to meet the requirement that, at the time it adopts a final EIS, the NPS state whether all practical mitigation measures and a monitoring and enforcement program have been adopted. See 40 C.F.R. 1505.2.” (California Department of Justice, Sacramento, CA - #5430)

“The technology presently exists to phase-in alternatively fueled shuttles. . . We realize that the Draft is subject to change, and the visitor and resource protection study will take 5 years to complete but in Chapter 2, under Alternatives Considered But dismissed, the Draft rules out the possibility of alternative forms of public transportation , . . A clearer implementation process would be most helpful in understanding this key area of the Draft.” (Recreation Organization, Silver Spring, MD - #7137)

Response: See response following concern #295 below.

295. Public Concern: The *Yosemite Valley Plan* should contain a specific plan for the transition to the use of cleanest and quietest transit vehicles.

“The Yosemite Valley Plan should contain a specific implementation plan to move toward the use of the cleanest and quietest transit vehicles in the Valley as soon as is technologically feasible.” (State Agency, Sacramento, CA - #5430)

“There should be a statement of intent to switch all service vehicles within Yosemite National Park to more environmentally friendly power systems such as fuel cell power.” (Individual, Coulterville, CA - #3724)

Response: Yosemite National Park has consulted with statewide nonprofit organizations and has coordinated with local community groups to discuss the benefits associated with alternative fuels. In addition, numerous transportation studies have been undertaken for Yosemite National Park, and staff is continuing to work with the U.S. Department of Transportation and several transportation consultants to evaluate and test alternative transportation technology.

The *Final Yosemite Valley Plan/SEIS* seeks to accommodate visitor travel needs while protecting natural resources such as air quality and natural soundscapes. The availability of proven transit vehicle technology; supporting infrastructure, such as refueling and maintenance facilities and environmental characteristics, including air emissions and costs, are all major factors in decisions related to transit vehicle selections. The park has conducted a number of studies of transportation alternatives for travel to and in the Valley and continues to work with other federal agencies and transportation consultants to evaluate alternative transportation fuels and technology.

The National Park Service is moving toward using the cleanest and quietest transit vehicles in the Valley. The National Park Service has committed in Vol. IA, Chapter 1 of the *Final Yosemite Valley Plan/SEIS* to continue to implement technologies that reduce mobile sources of air pollution. Vol. II, Appendix M, Sequencing Plan, provides additional information regarding the sequencing and timing of the implementation of a shuttle system. Providing a more specific implementation plan for cleaner, quieter transit vehicles is impractical due to the uncertainties regarding the availability of future transit technologies.

(This response also applies to concerns #516, #522, and #296.)

4.13.10 ~ Public Transportation

Required use of public transportation gets mixed reviews among those who commented on the *Final Yosemite Valley Plan/SEIS*. Contained in this section are a wide variety of comments about the existing and proposed shuttle systems as well as reasons to limit commercial tour bus operations.

4.13.10.a ~ General Management Direction

Issues of quality, affordability, convenience, and safety as they relate to required public transportation are covered in this section. People want a user-friendly system that doesn't inconvenience visitors. Others don't want to be “waiting for a dozen families to load all their stuff on the bus,” and resent “people everywhere in your space.” Accommodations on public transportation, as well as the maintenance of vehicles, safety features, and emergency preparedness concern some people.

A number of people mention the size of tour buses as it relates to safety on the road and space in parking lots. Charging a premium for overwide buses, one respondent suggests, would help discourage companies from using large buses. Since oil seal replacement is more expensive than oil, many bus companies don't perform regular maintenance on buses, states an individual who also asserts that “the NPS must force the bus concessionaire to provide leak-free buses.”

43. Public Concern: The *Yosemite Valley Plan* should establish a convenient, affordable public transportation system for Yosemite National Park visitors.

“If convenient and adequate public transportation is available at a reasonable price in convenient locations, it is the most desired alternative. I believe those coming to Yosemite for a day trip should be required to park at the



entrances. However, public transportation to accommodate their needs should be available (including bicycle transport). If you compare the facility to an amusement park such as Disneyland, attendees park outside of the facility but are given access to a variety of free and convenient transportation facilities to meet their needs.” (Individual, Roseville, CA - #30015)

“We recommend that you phase in a user-friendly, transit system that does not itself create more pollution, overcrowding or sprawling impacts.” (Individual, Bakersfield, CA - #975)

Response: The *Yosemite Valley Plan’s* Preferred Alternative (Alternative 2) provides out-of-Valley parking and convenient in-Valley parking areas. Parking outside the Valley was located where sites are of adequate size to meet expected parking demand, where natural and cultural resource impacts would be minimized, and where the topography would allow cost-effective development. There is not enough flat land near the entrance stations to accommodate the required number of parking spaces.

Transportation and parking actions in the *Yosemite Valley Plan* would be phased to maintain convenient access for day visitors. Out-of-Valley parking areas and shuttle bus service would be in place prior to the restoration of existing in-Valley parking areas or the closure of roads in the Valley.

94. Public Concern: The *Yosemite Valley Plan* should not make public transportation mandatory for visitors to Yosemite Valley.

“Use of the buses from the entry portals should be optional. When adequate public transportation is provided, people will use it when it makes sense, as demonstrated by the success of the existing shuttles on the valley floor.” (Individual, Tucson, AZ - #30183)

Response: Under the Preferred Alternative of the *Final Yosemite Valley Plan/SEIS*, day visitors to Yosemite Valley would have the option of traveling to the Valley on shuttle buses from parking areas along each of the approach routes to the Valley or, if parking in the Valley were available, driving to a designated parking area. When the parking areas in the Valley were full, day visitors would be able to travel to the Valley by shuttle bus or regional transit bus.

The buses that would operate as shuttles to and from the remote parking sites could be leased and, if appropriate, would be vehicles with low emissions and low noise levels. If necessary, the vehicles could be purchased. The decision to purchase or lease the buses is an operational detail that is beyond the scope of the *Yosemite Valley Plan*.

162. Public Concern: The National Park Service should consider the impacts of mandatory public transportation on Yosemite National Park visitors.

“If you don’t have overnight reservations, you have to load all your stuff, backpack, climbing gear, kid stroller, bike, swim fins, whatever, onto a shuttle bus at the gate and pay a fare that covers your admission to the park and shuttle service. You thought your park experience was going to be more serene but now you are waiting for a dozen families to load all their stuff on the bus. Their kids (or your kids) are calling out their needs and dissatisfactions and there are people everywhere in your space.” (Individual, Wawona, CA - #46)

“Ordinary buses for public transportation [are] somewhat of a hassle, but sharing a bus with families and their gear for an all-day outing will be much worse.” (Individual, San Jose, CA - #30088)

Response: All visitors would have the opportunity to drive into the Valley. Visitors staying overnight in the Valley would not be required to travel by shuttle bus. Except for campers using walk-to units, all overnight visitors would have the option of driving private vehicles to designated parking spaces in the Valley.

Some day visitors would be able to drive private vehicles to the Valley and park in designated spaces. When parking in the Valley was full, day visitors would park in areas along each of the approach routes to

the Valley. Shuttle service would be provided on a frequent basis from the parking areas to Yosemite Valley. The shuttle buses would be equipped with baggage areas and, possibly, trailers to accommodate recreational equipment.

Some visitors could find using the bus less convenient than driving because of the need to load recreational gear onto the bus. These visitors could also be inconvenienced by having to transfer the gear from an out-of-Valley shuttle bus onto an in-Valley shuttle. Visitors to whom the convenience of carrying recreational equipment is of primary importance would be likely to adjust their travel schedules or plan ahead to ensure that they could drive to the Valley.

The overall impact of the need to load gear onto buses has been judged to be minor, since most day visitors bring relatively little extra gear and few visitors on busy days are able to park directly at the activity areas they visit. Many visitors today transfer gear onto a Valley shuttle or walk long distances from their cars carrying the gear they need. The added shuttle from out-of-Valley parking locations adds a relatively minor burden. It could actually improve access to popular locations for other visitors.

167. Public Concern: The *Yosemite Valley Plan* should address safety of public transportation vehicles in Yosemite Valley.

“Bus safety features and accommodations will be required to ensure safe travel for numerous passengers. What maintenance schedules are proposed for out-of-Valley buses, and in-Valley shuttles? . . . These buses must be equipped and maintained regularly to navigate mountain passes. Will all buses be equipped with seatbelts . . . Will baby seats and child seats be available on each bus? . . . How will wheelchairs be secured to remain in place while buses travel up and down steep mountain roads? . . . Will each bus be equipped with Global Satellite Positioning units to enable YNP emergency personnel to quickly and accurately determine bus locations in the event of an accident?” (Individual, Malibu, CA - #1164)

Response: Specific buses to be used in the shuttle service, safety features of the buses, the specific means of accommodating passengers and gear, and maintenance schedules for buses are operating issues beyond the scope of this planning effort. Operation of buses would be based on established industry practice, and operators would be required to meet all applicable standards. All buses would meet federal and state safety standards. Buses would be inspected on a regular basis to ensure that they are in safe working order. Buses would be equipped with communication and other safety equipment as required for safe operation and response to emergencies.

448. Public Concern: The National Park Service should encourage the use of eight-foot-wide buses in Yosemite Valley.

“When selling road-use permits to tour operators, we might think about charging a premium for ‘over-wide’ (8’6”) vehicles. If we do, it should be applied across the board to all over-wide vehicles; motor homes should not be exempt. Perhaps this over-width premium could be double the amount charged for standard-width vehicles. Such a premium would encourage the use of 8’ buses. It is possible that this premium could turn into a revenue center for the Park. Some tour operators have standardized their entire fleet to 8’6” buses. Other tour operators may refuse to compromise the comfort of their passengers on a cross-country tour . . . just to save a few bucks in one national park.” (Individual, Pittsburg, CA - #6224)

Response: This concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan*. Regulations or incentives regarding vehicle size in Yosemite Valley are operational details that are not consistent with the purpose and need or goals of the *Yosemite Valley Plan*. Vehicle size restrictions are based on safety considerations in Yosemite National Park, and this would continue under any alternative in the *Final Yosemite Valley Plan/SEIS*. Fee policy is set by the National Park Service headquarters in Washington, D.C., under the direction of the Secretary of Interior and Congress.



427. Public Concern: The *Yosemite Valley Plan* should include maintenance requirements for buses in Yosemite Valley.

“The current fleet of shuttle buses leak engine oil and gear oil in great quantities. A look at the street in front of the Village Store or any other shuttle bus stop will confirm this problem. Much of the oil that leaks from vehicles eventually ends up in the river. The reason that a bus leaks oil is due to poor maintenance. Oil seals in engines, transmissions, and final drive units can and should be replaced on a regular basis. This and other common maintenance procedures will keep even old buses from leaking. But oil is cheap compared to oil seal replacement, so the bus concessionaire is not going to keep up with necessary maintenance unless required to do so. The NPS must force the bus concessionaire to provide leak-free buses. Any new contract must specify oil spill limits, measurement technologies, enforcement procedures, and significant and severe fines for non-compliance.” (Individual, Lodi, CA - #4474)

Response: This concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan*. Numerous transportation studies have been conducted for Yosemite Valley and have found that the rubber-tired, over-the-road vehicles should be the primary mode of transportation for moving people into, out of, and around Yosemite. The operation and maintenance of buses would be based on established industry practice and the operator would be required to meet all applicable standards. All buses would meet federal and state safety standards and would be inspected on a regular basis to ensure that they are in safe and efficient working order.

4.13.10.b ~ Shuttle Buses

Public reaction to the proposed transportation system is mixed, although many respondents suggest measures to improve the proposed system. Existing shuttle service, many say, should be increased to include walk-in campsites, Bridalveil Fall, the lower river area, and El Capitan. Others would like the shuttles to run for extended hours for the convenience of people, such as climbers, going to remote sites. In addition to these suggestions some people would like the shuttle service extended outside the Valley to outlying communities.

For other Park visitors “buses are a mediocre solution.” People want to bring recreational equipment and “need someplace safe to keep belongings.” Experienced respondents find the buses “nowhere near efficient enough to be a reasonable alternative” for getting to trailheads because they don’t run on time and are overcrowded. Some feel that it takes too much time to use public transportation. Another respondent worries that foreign tourists will get split up and lost. If the National Park Service enforces the 10,530-visitor limit proposed in the *Draft Yosemite Valley Plan*, a respondent contends, “there would be no need for a for a bus or shuttle system.”

People express a variety of concerns about the transition to public transportation. Some say the Park Service should encourage sightseers to ride the bus by offering incentives. They suggest partial rebates on fees, panoramic views through glass domes, better bus design, and low fares as good incentives. Others feel that the “seasonal use of the transportation system is unclear” and want to know how transportation will be handled in the off-season. A few people feel that winter operation of shuttle buses on Badger Pass and Glacier Point Road will prove unsafe.

Respondents offer various suggestions to make shuttle service more popular such as closing Northside Drive to all but shuttle and foot traffic. Many ask that any shuttle service include stops at Tunnel View because “the omission . . . could be so great a loss that it would likely motivate people to . . . avoid riding a bus to the Valley.” Buses should make random stops, others feel, especially in the West Valley. Requests that adaptations for bikes and wheelchairs be made on shuttles come from people who want to be able to visit sights outside of the Valley. Afraid that mandatory shuttle systems might affect schoolchildren, an individual advocates that school buses “must have access at all times to the park schools.”

17. Public Concern: The *Yosemite Valley Plan* should increase shuttle services for Yosemite National Park visitors.

“Shuttles should be increased to help campers get to their walk-in campsites.” (Individual, Fullerton, CA - #39)

“Please increase the local bus service to include Bridalveil Falls and the lower river area.” (Individual, Newcastle, CA - #541)

“The shuttle should extend to the base of El Capitan also.” (Individual, Fort Bragg, CA - #7304)

“We are especially in favor of the expanded shuttle bus service to Bridalveil Fall which is part of Alternative 2-5.” (Individual, Oakland, CA - #4419)

EXTEND HOURS OF OPERATION

“Failure to address these issues could have the deleterious effect of denigrating the experience of climbers by concentrating climbing use in areas easily accessed by shuttle buses and by making it difficult to climb at more remote areas or to climb longer climbs requiring an extended day. A transportation system should service the entire valley during all hours in order to maintain the current climbing experience. Tired climbers should not have to find themselves miles from transportation after epic climbs.” (Individual, Adelphi, MD - #6959)

“Adequate shuttle service from parking lots is important. . . Shuttle service should start early, end late, and be frequent.” (Individual, Mammoth Lakes, CA - #7014)

PROVIDE SERVICE OUTSIDE YOSEMITE VALLEY

“Would it be possible to extend the free bus system to the outlying areas of the park? We might stay / camp in the Crane area if there was a way to get to the valley floor for both us and our bikes. We try to not drive our vehicle after we arrive.” (Individual, Roseville, CA - #30015)

“I am a poor man. I take the bus. You now want shuttle-bus service to Bridalveil Falls. I want it to El Portal, or better still: Merced, Fresno, and Lee Vining. The Yosemite National Park experience should be only by bus.” (Individual, Los Angeles, CA - #96)

Response: The *Final Yosemite Valley Plan/SEIS* Preferred Alternative includes increased shuttle bus service in Yosemite Valley and to the Valley from parking areas outside, including El Portal, Badger Pass, and Hazel Green or Foresta. Shuttle bus service would be provided to the west end of Yosemite Valley, including Bridalveil Fall and El Capitan. Shuttle stops in Yosemite Valley would be located to serve visitor destinations, such as walk-in and walk-to campsites. Shuttle would operate from early morning to late evening. Visitors needing transportation when regular shuttle buses are not operated (early in the morning or late at night) would be served by specialized means, which could include early and late climber special buses or on-demand service with courtesy vans. The operational details of specialized transportation are beyond the scope of the Yosemite Valley Plan. If out-of-Valley parking is constructed at Hazel Green, the details of how the shuttle service in this area would fit with transportation needs to Crane Flat is an operational detail that is beyond the scope of the *Yosemite Valley Plan* but would be addressed in subsequent planning. Shuttle bus service to other parts of the park, such as Tuolumne Meadows and Wawona, are beyond the scope of the Yosemite Valley Plan. The National Park Service cannot provide a free shuttle system outside the park. Rather, the park must work with partners, such as the Yosemite Area Regional Transportation System (YARTS), to develop these services. YARTS is currently running a demonstration transit service project to the park from Merced, Mariposa, and Mono Counties. As part of this demonstration system, it is possible to arrive in Merced via Amtrak and get to Yosemite Valley year-round. YARTS is striving to improve connecting service to Tuolumne Meadows and Wawona from public transportation hubs such as Merced and Mammoth Lakes from Memorial Day to mid-September.



159. Public Concern: The National Park Service should recognize the shortcomings of shuttle bus transportation for Yosemite National Park visitors.

“But for those who plan to stay a week and want a lot of active recreation, buses are a mediocre solution. When I come to the valley, I bring my bicycle (I hardly drive at all inside the valley except to get in and out), my swimming/snorkeling gear, etc. Other people bring rafts, etc. It’s going to be difficult to fit all that into a bus. And of course I need someplace safe to keep my belongings once I’m in the valley. Overall, the bus option is worth exploring, but I’m very skeptical that it will actually work well, at least for many of the visitors” (Individual, Mountain View, CA - #1077)

“We found the shuttle bus system nowhere near efficient enough to be a reasonable alternative to getting to trail heads for Mirror Lake, Vernal/Nevada Falls, etc. They didn’t run on time and at even intervals and were over crowded.” (Individual, No Address - #1226)

“Average travel time to access the Valley would increase by 21 minutes over alternative 1, representing a moderate, long-term adverse impact to visitors.’ 21 minutes understates the delay significantly for most people. . . It applies only at peak summer times when buses run every 7-12 minutes or so. It does not include much time for increased packing/unpacking, paying fees, waiting, etc. It does not include added time due to less buses running in spring and fall. And additional time to walk from a bus stop to a location where presently parking is allowed. As worded this 21 minutes is a one way best case. If someone would like to have left the park thru a different exit then the effective delay may be more like 4 hours.” (Individual, San Diego, CA - #3479)

“When a bus full of foreign-language speaking tourists and their foreign language guide arrives at the transit center, your plan will scatter them onto many shuttle buses for their valley tour. Without their guide, these tourists will find their experience severely degraded. . . And think of the liability when the foreign language tourists get lost or injured.” (Individual, Oakhurst, CA - #3379)

Response: The in-Valley shuttle bus routes in the Preferred Alternative would provide improved service over that provided on the existing Yosemite Valley Shuttle bus system. The existing shuttle is operated with an insufficient number of aging buses. The existing shuttle buses are delayed by traffic congestion and serve stops that are inadequate in size and poorly designed. The Preferred Alternative would remedy these existing problems. People who stay overnight in the Valley, the minority of visitors, would be able to drive their cars into the Valley, unless staying in a “walk-to” campsite. These visitors could then use in-Valley shuttles, bicycles, or walk to destinations in the Valley.

Some day visitors, which are the majority, would have the opportunity to drive into the Valley and park at the designated day-visitor parking area, using their vehicles to transport recreational equipment. Visitors traveling into the Valley by shuttle bus would be able to use storage areas in the shuttle vehicles to transport recreational equipment. The transportation system for the Valley would provide a range of options to meet the varying needs of visitors.

135. Public Concern: The National Park Service should reconsider the need for shuttle bus service in Yosemite Valley.

“It (the Yosemite Valley Plan) would set a specific limit of 10,530 visitors to be allowed in the valley at any one time. It was estimated that these would consist of 50% day users . . . 30% local overnights . . . and 20% park overnights. . . I would like to convince you that if this limit is enforced there will be no need for a bus or shuttle system. In addition . . . trying to do this much with a bus system would be impractical . . . that calculates to one bus arriving and leaving the valley every 2.85 minutes over an entire 12 hour period. 60 persons per bus may not be a correct number, but whether you adjust the numbers up or down that kind of bus traffic in a national park makes little sense, either esthetically or from a cost of operation standpoint.” (Individual, Pacific Palisades, CA - #17)

Response: The 1980 *General Management Plan* established a maximum use level of 18,241 visitors per day in Yosemite Valley. The action alternatives in the *Final Yosemite Valley Plan/SEIS* would provide facilities in Yosemite National Park that are scaled to accommodate the number of daily visitors

established in the *General Management Plan*. There is no established limit on the number of people in the Valley at any one time.

The action alternatives in the *Final Yosemite Valley Plan/SEIS* propose a range of facilities and services for access to the Valley for day visitors. Overnight visitors are assumed to travel to the Valley in private vehicles. Parking facilities for day visitors under the action alternatives would be located and sized to meet a range of objectives, including restoration of highly valued resources and an improved visitor experience. Except for Alternative 3, there would not be enough parking in the Valley to accommodate all of the day visitors. Each action alternative, except Alternative 3, provides out-of-Valley parking for day visitors and a system of shuttle buses. Shuttle service in Alternatives 2 and 4 would arrive in the Valley from out-of-Valley locations about every 3 minutes during peak travel hours. Early and late in the day, buses would arrive less frequently. The operating costs of the action alternatives reflect the amount of shuttle service that would be needed to bring day visitors from out-of-Valley locations. In addition, each action alternative includes in-Valley shuttle service that would be used by day visitors and overnight visitors.

715. Public Concern: The *Yosemite Valley Plan* should provide incentives for people to use the shuttle system.

“Since the shuttle bus system is voluntary, there needs to be some sort of incentive, at least initially, to get people out of their cars and into the buses. Perhaps a rebate on part of the entrance fee upon return to the bus terminal would be useful. Or, alternatively a surcharge on the car.” (Individual, San Jose, CA - #2314)

“If buses are going to be a viable alternative to the car for sightseeing day visitors, then taking a bus has to become a highly desirable experience. The buses need to offer visitors a panoramic view of the valley through a glass-domed roof with an air-conditioned cabin. The busses should have multiple entrances and exits so that sightseers don’t have to wait to get on or off the busses.” (Recreational Organization, No Address - #3800)

“Inexpensive transportation is essential for automobile reduction. At this time bus tickets for a family of four from the valley floor to the Mariposa Grove will cost over \$100.00. . . By comparison if you drive your own vehicle the cost is a maximum of \$25.00 for the entire family.” (Individual, Valinda, CA - #5642)

Response: Concerns regarding the design of shuttle buses are acknowledged; however, they are outside the scope of the *Yosemite Valley Plan*. Shuttle buses operated as described in the *Yosemite Valley Plan* would incorporate design and technology considerations to provide a quality visitor experience. The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* includes a traveler information and traffic management system that would, among other things, create incentives to use shuttle buses. These incentives, including the use of fees or free transit, will be the subject of subsequent planning effort with intensive public involvement.

297. Public Concern: The *Yosemite Valley Plan* should include an analysis of measures to ensure shuttles remain affordable.

“Given the contemplated reduction in automobile traffic and the projected use of shuttle buses, the Plan should also include an analysis of measures to ensure that these shuttles are affordable to the Park visitors who would no longer be able to stay in the Park in low-cost units.” (California Department of Justice, Sacramento, CA - #5430)

Response: The *Yosemite Valley Plan* includes estimates of the costs associated with the shuttle buses serving Yosemite Valley and the out-of-Valley shuttle system. The cost estimates include the costs to purchase the buses and the facilities needed to operate and maintain the buses and the ongoing operating and maintenance costs. The National Park Service intends to keep shuttles affordable.



124. Public Concern: The *Yosemite Valley Plan* should clarify operational details of off-season shuttle bus service in Yosemite Valley.

“The seasonal use of the transportation system is unclear. There are two references to off-season being October, April and May. Would the transportation system be operating only from April to October? . . . Who is going to operate the system, and what incentive will they have to maintain a minimum level of service? How will it be funded?” (Business, Yosemite National Park, CA - #385)

“What is to be done with the out-of-Valley shuttle bus fleet during the off season?” (Non-Governmental Organization, Wawona, CA - 7882)

Response: Shuttles operating in Yosemite Valley would provide service year round. Generally, the peak visitation season for Yosemite National Park is from mid-June through Labor Day weekend. April, May, September, and October comprise the shoulder seasons, with intermediate levels of visitor use. Visitation is lowest from November through March. The operating hours of the shuttle buses and the frequency of service would be adjusted within each season as required to meet visitor needs while managing visitation so as not to exceed the carrying capacity of visitor use areas. Routes and frequency could also be adjusted to manage use levels in some areas, as might be required by the Visitor Experience and Resource Protection program. (Also see Vol. IA, Chapter 2, Alternatives, Actions Common to All Alternatives Visitor Use in Yosemite Valley).

Shuttles from out-of-Valley parking sites to the Valley would not operate from November through March when parking in Yosemite Valley would be sufficient to serve day visitors. Service on out-of-Valley shuttles would start in April, beginning with weekends. As visitation increased, the amount of service would be expanded, reaching a maximum level on weekends in the summer. Service would be reduced in the fall as the need decreased, with shuttles to out-of-Valley parking areas operating only on weekends in the last weeks of the season in October.

The shuttle bus systems proposed in the Preferred Alternative would be operated by an entity (private company or other organization) under contract with the National Park Service. The terms and conditions would include minimum levels of service to be provided for each shuttle route.

The operational details of scheduling shuttle bus use is beyond the scope of the Yosemite Valley Plan. It is likely that routine preventative maintenance and major overhauls would be scheduled during the shoulder seasons and in the winter. Buses not undergoing maintenance or repair and not needed for daily operation during non-peak seasons would be stored at the maintenance facilities provided in the Preferred Alternative.

464. Public Concern: The *Yosemite Valley Plan* should address the safety hazards of operating a shuttle bus system during the winter in Yosemite National Park.

“In the wintertime . . . people get concerned going up Badger Pass Road or Glacier Point Road . . . They have concern when the snowplow comes down. Can you imagine coming down with a bus coming around several of those turns? Even in the summertime it is not a good situation. We have concerns about the buses, where cars slow down, they swerve, you are enjoying the beautiful vistas going up and down Glacier Point Road, you cannot see it with the buses going past and pulling over and get out to see that.” (Public Hearing, Fresno, CA - #20509)

Response: Shuttles from out-of-Valley parking sites to the Valley would not operate from November through March. Parking in Yosemite Valley would be sufficient to serve day visitors. Generally, the peak visitation season for Yosemite National Park occurs from mid-June through Labor Day weekend. April, May, September and October comprise the shoulder seasons, with intermediate levels of visitor use. Visitation is lowest from November through March.

Parking in the Valley would accommodate the lower visitation levels from November through March. Out-of-Valley shuttle service would start in April, beginning with the weekends. As visitation and the

demand for parking increased, shuttle service would be expanded, reaching a maximum level on weekends during the summer.

594. Public Concern: The *Yosemite Valley Plan* should maintain shuttle bus service on Northside Drive.

“Northside Drive should be closed to private vehicles and sightseeing tours but hourly shuttle service should be allowed.” (Individual, Elk Grove, CA - #132)

Response: Northside Drive would be closed to all vehicle traffic from Yosemite Lodge to El Capitan crossover in order to provide a multi-use paved trail and to offer visitors an area near the Merced River free from the sights, sounds, and emissions of vehicles. The operation of shuttles along Northside Drive would defeat the purpose of establishing a vehicle-free area. In-Valley shuttle services would be available to take visitors to activity areas throughout the Valley and as far west on Northside Drive as Yosemite Lodge and as far west on Southside Drive as Bridalveil Fall.

379. Public Concern: The *Yosemite Valley Plan* should require that Valley shuttles stop at Tunnel View.

“Missing from the plan is mention as to whether the Valley Shuttle system will stop at Tunnel View. Nearly all Yosemite Visitors stop at this most historic and beautiful overlook. The Valley Shuttle System should also stop at this location or a great many of those required to ride by bus to Yosemite Valley will be greatly disappointed and will have missed seeing one of Yosemite’s greatest features. The omission of a Shuttle Bus stop at Tunnel View could be so great a loss that it would likely motivate people to find ways to avoid riding a bus to the Valley.” (Business, Yosemite National Park, CA - #3962)

Response: This specific operational detail is beyond the scope of the *Yosemite Valley Plan*. In planning schedules for out-of-Valley bus service from Badger Pass to the Valley and for west Valley shuttles, a stop at Tunnel View would be considered. Visitors who drive to the Valley and park would have the option of stopping at Tunnel View enroute to the Valley.

353. Public Concern: The *Yosemite Valley Plan* should require that West Valley buses operate on a random stop basis.

“We would prefer that the West Valley route buses operate on a random stop basis (a la Denali N.P.). Pull the cord to ring the bell to get off and flag down the bus to get on (where safe to do so) would be the idea. This would assist in meeting visitor’s goals as stated on page 3-19 of the Executive Summary. Of course, removing all the pull-outs (which we vehemently oppose) would make this approach impossible.” (Individual, Oakhurst, CA - #3379)

Response: When the routes and schedules are planned for the west Valley shuttle service the idea of on-demand stops will be considered. Some areas may be determined inappropriate for stops because of resource protection or safety concerns. The specific routes and schedules for shuttle service are operational issues that are beyond the scope of the *Yosemite Valley Plan*.

216. Public Concern: The National Park Service should allow bicycles and wheelchairs on transit buses in Yosemite Valley.

“Allow the owners of bikes and wheelchairs to bring their own bikes on the shuttle bus to use within the Valley.” (Public Hearing, San Jose, CA - #20529)

Response: All of the in-Valley and out-of-Valley shuttle buses that would operate as described under the Preferred Alternative would accommodate wheelchairs. Out-of-Valley shuttle buses would also accommodate bicycles. Vol. IA, Chapter 2 of the *Final Yosemite Valley Plan/SEIS* describes the operation of shuttle buses in detail.



414. Public Concern: The National Park Service should ensure school bus services for children attending Yosemite National Park schools.

“It should also be noted that the school buses, for the purpose of the education of District children, must have access at all times to the Park schools.” (Mariposa County Unified School District, Mariposa, CA - #4498)

Response: This concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan*. The *Yosemite Valley Plan* would not affect service by Mariposa County Unified School District buses.

759. Public Concern: The National Park Service should clarify how determinations to select shuttle bus fuels will be made.

“The SEIS includes a discussion of the use of alternative fuels in the park shuttle bus system and presents a range of fuel options and the emissions for those fuels (p. 4.2-43, 4.3-21, 4.4-23, 4.5-22). The fuel options include diesel, compressed natural gas, propane, and fuel cells. However, the SIES does not specify which fuel(s) will be used or how the determination will be made to select fuels.” (Environmental Protection Agency, San Francisco, CA - #10295)

Response: The National Park Service is moving toward the use of the cleanest and quietest transit vehicles feasible in the Valley, and has committed in Vol. IA, Chapter 1 of the *Final Yosemite Valley Plan/SEIS* to continue strategies to implement technologies that reduce mobile sources of air pollution. The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* states that the National Park Service would consider low-noise, low-emissions, cost-effective, and best available technology as well as the use of clean fuels as primary criteria for acquiring in-Valley and out-of-Valley shuttle bus fleets.

In addition, the National Park Service is currently replacing its diesel in-Valley shuttle bus fleet. Low noise, low emissions, cost effectiveness, and the use of clean fuels are the criteria for purchasing these vehicles. Additionally, these buses must meet or exceed California Air Quality Standards. The air emissions analyses indicate that the use of diesel buses would have a beneficial impact on all emissions except nitrogen oxide emissions in the Preferred Alternative. The use of alternatively fueled buses would further reduce some emissions.

4.13.10.c ~ Commercial Tour Buses

Some respondents question how transportation changes will affect the use of commercial tour buses in Yosemite National Park. They call for restrictions on tour buses because they “belch out black foul-smelling diesel smoke that lingers in the air.” They take up too much parking, other people claim, bring in more people and only stay a few hours. Any buses that are allowed in the park, many insist, should be required to “shut down their engines while parked, reducing noise and air pollution.”

68. Public Concern: The *Yosemite Valley Plan* should limit commercial tour bus operations in Yosemite Valley.

“The problem is not the cars, cars are regulated for pollution . . . however tour buses are not regulated. Tour buses are the pollution problem, I have photographed tour buses belching out black foul-smelling diesel smoke that lingers in the air. They require fourteen parking spaces per bus. I have documented and photographed this . . . Eliminate the tour buses from the valley.” (Individual, Stratford, CA - #65)

“And what about restricting the tour buses - they bring more people into the valley in one swoop than do family campers. Of course Tour Buses bring in money to concessions - but to plead impact because of campers and ignore the stop and go buses that blight the landscape and dump people for a quick fix on Yosemite Falls seems a hypocrisy.” (Individual, Saratoga, CA - #10)

“Allow four buses access to the Valley floor only if they stay for at least 6 hours. Otherwise turn them around at the Tunnel over-look where they can view everything except Yosemite Falls. We saw tour buses stop in front of the Lodge, their passengers getting off on the run with lunch in hand. They are not enjoying the beauty of the Valley.” (Individual, Los Angeles, CA - #5528)

“Limit the number of tour buses that can enter the Valley per day and require all bus operators to shut down their engines while parked, reducing noise and air pollution.” (Individual, Los Altos, CA - #2985)

Response: As with all vehicles, the number in Yosemite Valley would be limited by the amount of parking, and in the case of buses, by the number of bays at the proposed transit center. This would be managed as a part of the overall traveler information and traffic management system. A discussion of this system is presented in Vol. IA, Chapter 2, Actions Common to All Alternatives.

672. Public Concern: The National Park Service should address the environmental impacts of commercial tour buses in Yosemite National Park.

“Tour buses present a problem that is separate from shuttle buses. The rapid, recent increase . . . is not addressed in the draft plan adequately. . . There has been no environmental impact study process concerning the additional permission for so many of these buses. What limits . . . does the NPS support, and how will such limits be enforced?” (Individual, San Francisco, CA - #7154)

Response: The National Park Service does take into account the impacts of commercial buses, especially in the areas of air quality and traffic volume (see the *Final Yosemite Valley Plan/SEIS*, Vol. IB, Chapter 4, Environmental Consequences—Transportation). The *Yosemite Valley Plan* would implement a de facto limit on the number of commercial tour buses in Yosemite Valley by providing a finite number of parking spaces for these buses.

4.13.11 ~ Regional Transportation

The role of the Yosemite Area Regional Transportation System (YARTS) in the *Draft Yosemite Valley Plan* is not clear to many people. Some offer suggestions to incorporate YARTS in the *Final Yosemite Valley Plan*, while others call for additional analysis regarding the implementation of YARTS as part of the plan. “If YARTS is in operation, it makes little sense for the National Park Service to develop and fund its own transportation system,” states one conservation organization. Additional discussion regarding the impacts of a regional transit system on circulation inside and outside the park would be helpful, the California Department of Transportation asserts, to provide a clear picture of regional transportation needs.

Comments about the role YARTS will play in the Yosemite Valley Plan reflect public uncertainty. One individual expresses concerns that YARTS buses and 45-foot motor coaches will continue to be allowed in the park. A request is made that YARTS and the Park Service share information so that both have the same answer to similar questions. The CALTRANS mandate on restricting tour buses over 40 feet in length, bears examination, the Tuolumne County Board of Supervisors asserts.

Employees should be encouraged to use YARTS, many claim. “If access is reduced for anyone, it should not be the visitor,” remarks one U.S. Representative. Others request that YARTS only be used during peak periods. One citizen asks that the Park Service not incorporate YARTS as part of the transportation plan because of logistics. “The YARTS program is doomed to failure,” this person predicts, “because it can only work for those who plan on entering and leaving the park by the same entrance.”



Couched in comments about regional transportation issues are remarks about the traveler information and traffic management system. Supporters of the traveler information and traffic management system direct that the National Park Service to “begin designing the information and traffic management system as soon as possible.” The system should address climbers’ numerous transportation needs, one respondent states, as well as climbing and camping information. A county organization demands that the information and traffic management system be established before the Record of Decision and include “all projects that could have a secondary influence on Valley traffic circulation.” Reinforcing the link between traffic management and traveler information, an individual counters that information and traffic management system “would be unnecessary if visitation reservations were required.”

719. Public Concern: The National Park Service should evaluate the benefits of implementing both YARTS and the Yosemite National Park transportation system.

“The Draft YVP does not discuss this possibility, but, if YARTS is in operation, it makes little sense for the NPS to develop and fund its own transportation system to move day use guests. If YARTS has the capacity and capability to handle the satellite lot traffic, we fully support using that system, rather than having the NPS purchase or lease enough vehicles for a truly workable system.” (Conservation Organization, San Francisco, CA - #4594)

“Additional discussion regarding the impacts of a regional transit system on circulation inside and outside the Park would be helpful in determining the benefits of providing such a service to the Park, the region, and to local communities.” (California Department of Transportation, Stockton, CA - #30245)

Response: The National Park Service is supportive of a regional transportation system that serves visitors and employees and provides an alternative to the private automobile. The *Yosemite Valley Plan* allows access for Yosemite Area Regional Transportation System (YARTS) buses and larger motor coaches to the Yosemite Valley transit center where riders could access shuttle service throughout the Valley. The National Park Service recognizes the benefit of these transit systems working together. However, YARTS is an effort independent of the *Yosemite Valley Plan*. The *Yosemite Valley Plan* can be implemented with or without the implementation of regional transit service. This plan does not preclude YARTS from adding or improving service to out-of-Valley parking locations, or from operating under similar contracts to the out-of-Valley transit service, or from increasing regional transit service to Yosemite Valley from locations outside the park. However, all of those details are beyond the scope of this plan because the National Park Service does not have the authority to create such a regional system or mandate its use. YARTS is presented in the Cumulative Impact Scenario (Vol. II, Appendix H) of the *Final Yosemite Valley Plan/SEIS*. The impacts of YARTS are included where relevant in the Cumulative Impact section of Vol. IB, Chapter 4, Environmental Consequences.

524. Public Concern: The *Yosemite Valley Plan* should maintain access for YARTS buses and large motor coaches to Yosemite Valley.

“Access for YARTS buses and for 45 foot motor coaches needs to be maintained. This will assure that visitors can conveniently use modes of transportation other than private vehicles to reach the Valley. The larger coaches are commonly used by tour operators providing services to foreign guests.” (Town of Mammoth Lakes, Mammoth Lakes, CA - #7014)

Response: The National Park Service recognizes the importance of transit access to the Valley from outside the park, which would ensure that visitors could use modes of transportation other than private automobiles to reach the Valley. The *Final Yosemite Valley Plan/SEIS* would allow access for Yosemite Area Regional Transportation System (YARTS) buses and larger motor coaches to Yosemite Valley.

To support regional transit and commercial buses, a Yosemite Village visitor/transit center would be constructed where riders would arrive and depart and have the opportunity to access shuttle service for the

Valley. Dimension details of the transit center bus bays would be determined in a more detailed subsequent site plan. The dimension of buses using Yosemite Valley roads is a function of road design throughout the park and on state roads outside of the park. The concern about dimension of buses is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan* because the *Final Yosemite Valley Plan/SEIS* does not propose change to road widths in the Valley.

The *Final Yosemite Valley Plan/SEIS* alternatives include shuttle bus service in Yosemite Valley and to the Valley from parking areas outside, including El Portal, but not from outside the park.

YARTS is operating a transit service to the park from locations in the surrounding region. Their planning efforts are separate but complementary to Yosemite Valley planning. The National Park Service is supportive of a regional transportation system but does not have the authority to create such a system. (Also see response to public concern #719.)

591. Public Concern: The National Park Service should coordinate with YARTS to provide consistent responses to common transportation questions.

“YARTS still needs to be refined, you have a situation where you have contracted . . . for alternative traffic means into the Park but the only answers they give refer to their business only. The two of you together should at least have a consensus of some common questions you can both answer. For instance ‘is YARTS the only traffic access into the Park now?’ That question has been answered by a ‘no, you can still drive in’ from Park staff, and from YARTS we hear ‘we can’t answer for the Park, all we can tell you is our bus schedule.’ In my opinion YARTS should be capable of saying that private vehicles are still allowed until Park officials close it down.” (Individual, Modesto, CA - #4372)

Response: The Yosemite Area Regional Transportation System (YARTS) is an independent regional provider of transit. Its operations are beyond the scope of the *Yosemite Valley Plan*.

Although ongoing planning efforts by YARTS are separate, they are complementary to Yosemite Valley planning efforts. As part of a two-year demonstration project, YARTS is providing regional transit service into Yosemite National Park and may operate future regional service based on the results of this program. Regional transit service into the park, however, will remain a voluntary alternative means of transportation to the park even during the peak season.

The *Yosemite Valley Plan* calls for the development of a traveler information and traffic management system. This system would be developed through subsequent planning that would include public involvement. A primary goal of this system would be to disseminate accurate and timely information about ways to get to Yosemite Valley.

429. Public Concern: The *Yosemite Valley Plan* should address the CALTRANS-mandated tour bus length restrictions.

“The CALTRANS mandate on restricting tour buses in excess of 40 feet in length from traveling along State Route 120, between Groveland and Yosemite National Park, should be addressed in light of Tuolumne County’s non-participation in the YARTS process.” (Tuolumne County Board of Supervisors, Sonora, CA - #4436)

Response: This comment is acknowledged; however, it is beyond the scope the *Yosemite Valley Plan*. State Route 120 outside the park and Caltrans are outside the jurisdiction of the National Park Service. Within Yosemite National Park, vehicle size restrictions are based on road design and safety considerations. These considerations will continue to govern vehicle sizes as the *Yosemite Valley Plan* is implemented.



388. Public Concern: The *Yosemite Valley Plan* should include provisions that encourage Yosemite National Park employee use of YARTS.

“The plan works in conjunction with YARTS (if available) to reduce the employee use of limited parking. If access is being reduced for anyone, it should not be the visitor. Park and concession employees should be provided additional incentives to ensure that mass transit, rather than personal vehicles are the preferred mode of transport into the park. You have worked hard over the past year to ensure that employee transportation is made available through the YARTS process. The current YARTS demonstration project has shown an unexpected level of success in encouraging both employees and visitors to ride instead of drive into the park. We anticipate that your commitment to that project will continue.” (U.S. Representative, Fresno, CA - #2951)

Response: The *Final Yosemite Valley Plan/SEIS* would allow access for Yosemite Area Regional Transportation System (YARTS) buses and larger motor coaches to the Yosemite Village transit center. The employee transportation system described in this document would be a component of the overall transportation system for the Valley. Specific operating characteristics of the employee transportation system, however, are beyond the scope of the *Yosemite Valley Plan* and would be addressed as part of an operational plan for service into the Valley. The National Park Service is supportive of a regional transportation system that serves visitors and employees but does not have the authority to create such a system outside park boundaries. The ongoing planning effort by YARTS is separate, but complementary to, the Yosemite Valley planning effort.

497. Public Concern: The *Yosemite Valley Plan* should mandate the use of YARTS only during peak periods.

“YARTS should be offered as a voluntary alternative means to visit the Park except during peak times and holidays when people may be forced to take the bus because the parking capacity of the Park has been reached.” (Individual, Mariposa, CA - #7080)

Response: This concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan*. The National Park Service is supportive of a regional transportation system that serves visitors and employees and provides an alternative to the private automobile, however, the National Park Service does not have the authority to create such a system or mandate its use. The Yosemite Area Regional Transportation System (YARTS) is a Joint Powers Authority (JPA) under California law. The National Park Service has a cooperative agreement with the YARTS JPA to assist financially and through supportive policies and land use planning as long as the transit service is compatible with visitor-use goals and consistent with park plans and guidelines. Regional transit policies are approved by the JPA and land-use decisions continue to rest with the primary landholder or land-use agency (for example, Merced County, Mariposa County, Mono County, the U.S. Forest Service, Caltrans, or the National Park Service). The National Park Service has jurisdiction over bus stops and land use and all activities in Yosemite National Park and the El Portal administrative site.

Although ongoing planning efforts by YARTS are separate, they are complementary to Yosemite Valley planning efforts. Currently YARTS is demonstrating regional service into Yosemite National Park and may operate future regional service based on their findings. Using regional transit service into the park, however, would remain a voluntary alternative even during the peak season in accordance with the YARTS mission statement. For more detail on the YARTS project, see Vol. II, Appendix H.

Specifics about vehicle access to the park would be determined by the traveler information and traffic management system, which would be developed with extensive public involvement following the Record of Decision for the *Yosemite Valley Plan*.

114. Public Concern: The National Park Service should reconsider incorporating YARTS into the *Yosemite Valley Plan*.

“The YARTS program is doomed to failure, either by intent or ignorance. What is the incentive to use it? For people staying in . . . Oakhurst who plan on going to the Mariposa Grove, Glacier Point, the Valley and out over Tioga how can it work? It can only work for those who plan on entering and leaving the Park by the same entrance.” (Individual, No Address - #408)

Response: This concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan/SEIS*. The National Park Service is supportive of a regional transportation system that serves visitors and employees and provides an alternative to the private automobile, but the National Park Service does not have the authority to create such a system or mandate its use. The Yosemite Area Regional Transportation System (YARTS) is a Joint Powers Authority (JPA) under California law. The National Park Service has a cooperative agreement with the YARTS JPA to assist financially and through supportive policies and land use planning as long as the transit service is compatible with visitor use goals and consistent with park plans and guidelines. Regional transit policies are approved by the JPA and land use decisions continue to rest with the primary land holder or land use agency (for example Merced County, Mariposa County, Mono County, the U.S. Forest Service, Caltrans, or the National Park Service).

The National Park Service does not have the authority to implement a regional transit system on its own outside of park boundaries. Madera County, which includes the community of Oakhurst, chose not to participate in YARTS service. As a result, people staying in Oakhurst cannot use YARTS to access any part of Yosemite. Visitors traveling to the park from Merced, Mariposa, and Mono Counties can access Yosemite Valley using YARTS service during the peak season. Although YARTS ongoing planning efforts are separate, they are complementary to *Yosemite Valley Plan* efforts. YARTS is operating a demonstration of regional service into Yosemite National Park and may operate future regional service based upon its findings. Regional transit service into the park, however, will remain a voluntary alternative even during the peak season in accordance with the YARTS mission statement.

The *Yosemite Valley Plan* calls for the development of a traveler information and traffic management system. This system will be developed through a later planning process that will include public involvement.

176. Public Concern: The National Park Service should implement a traveler information and traffic management system in Yosemite National Park.

“Action: Implement a traveler information and traffic management system. Result: Any such system should be an integral part of a vehicle permit system of traffic management.” (Individual, Los Angeles, CA - #470)

“Development of this system [Traveler Information and Traffic Management System] should address climbers’ needs for roads, parking, and shuttle bus routes, after hours schedules, flexible and numerous stops, as well as climbing and camping information.” (Individual, Adelphi, MD - #6959)

“We additionally support the NPS’s plans to establish a detailed Traveler Information and Traffic Management System (TMS) immediately upon the issuance of a record of decisions on the YVP, expected in November 2000. Through the use of dashboard parking tags, gated and properly-signed parking lots, and well-trained, patient parking lot attendants, the Service must ensure that Alternative 2’s new transportation and parking system works as smoothly as possible and facilitates the public acceptance of change. We believe that the NPS should begin designing the TMS as soon as possible and develop a system of reservations for overnight and day-use visitors.” (Conservation Organization, San Francisco, CA - #4594)

Response: The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* includes a traveler information and traffic management system that would manage the number of vehicles in Yosemite Valley and, potentially, the park so as not to exceed the capacity of parking areas and roads. On days when the number of vehicles is equal to or less than the capacity of the parking areas and roads, one set of



management tools would be used to guide people to parking. During the period from November through March, parking for day visitors to Yosemite Valley is expected to be adequate to meet the demand. During the months with higher visitation, different management tools would be needed to guide people to available parking. The operational details of the tools in the traveler information and traffic management system are beyond the scope of the *Yosemite Valley Plan*. The traveler information and traffic management system would be defined during a subsequent planning process, which would include opportunities for public involvement. However, the National Park Service would make every effort to design the system to accommodate the needs of all user groups.

354. Public Concern: The National Park Service should complete the design of the Traveler Information and Traffic Management System and the Accessibility Plan prior to a *Yosemite Valley Plan* decision.

“Complete the design of the ‘Traveler Information and Traffic Management System’ and ‘Accessibility Plan’ first, in preparation for planning - not within five years after a Record of Decision. All projects that could have a secondary influence on Valley traffic circulation (e.g., out- of-Valley parking areas, visitor centers at the gates, etc.) should also be included.” (Madera County Board of Supervisors, Madera, CA - #4284)

Response: The *Yosemite Valley Plan* action alternatives include the implementation of a traveler information and traffic management system. Planning necessary for the detailed operations of this system is at a level of complexity and detail that is inconsistent with the *Yosemite Valley Plan*. Consequently, the traveler information and traffic management system would be implemented after a separate planning and environmental compliance process that would include extensive opportunities for public involvement. A plan indicating the sequence and probable timing of general improvements in the Valley, including elements of the traveler information and traffic management system, is presented in the *Final Yosemite Valley Plan/SEIS*, Vol. II, Appendix M. (Also see response to concern #55.)

Because specific area and facility design is left to subsequent planning efforts and because implementation of the *Yosemite Valley Plan* would be phased in over a period of years, it is appropriate that specific accessibility needs and plans be developed in concert with them, particularly since natural area recreation accessibility standards have not yet been fully developed. Although it is not possible in the *Yosemite Valley Plan* to develop specific elements of an accessibility plan, the *Yosemite Valley Plan* does include a commitment to meeting accessibility guidelines and providing the most feasible access for visitors with disabilities to structures, features, and programs. The plan also proposes that until buses are fully accessible, access for people with mobility impairments would temporarily remain similar to present conditions.

(Also see Vol. IA, Chapter 2, Visitor Experience—Access to Visitors with Disabilities.)

596. Public Concern: The National Park Service should consider replacing the traveler information and traffic management system with a visitation reservation system.

“Traveler Information and Traffic Management. This would largely be unnecessary if visitation reservations were required.” (Individual, San Marcos, CA - #4584)

Response: The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* includes a traveler information and traffic management system that would manage the number of vehicles in Yosemite Valley and, potentially, the park so as not to exceed the capacity of parking areas and roads. On days when the number of vehicles is equal to or less than the capacity of the parking areas and roads, one set of management tools would be used to guide people to parking. During the period from November through March, parking for day visitors to Yosemite Valley is expected to be adequate to meet the demand. During the months with higher visitation, different management tools would be needed to guide people to available parking. The operational details of the tools in the traveler information and traffic management

system are beyond the scope of the *Final Yosemite Valley Plan/SEIS*. The traveler information and traffic management system would be defined during a subsequent planning process, which would include opportunities for public input. However, the National Park Service would make every effort to design the system to accommodate the needs of all user groups.

A visitation or day-use reservation system could be one of the tools used in the traffic management system. However, the National Park Service would consider a variety of methods to manage vehicle use in the traveler information and traffic management system.

760. Public Concern: The *Yosemite Valley Plan* should include a focused description and discussion of YARTS.

“The implementation of the Yosemite Regional Transportation System (YARTS) has the potential to significantly impact traffic flows, parking demand, and air quality in and around Yosemite National Park. Mention is made of YARTS in Chapter 4: Environmental Consequences and other section of the document. However, a focused description of YARTS, its relationship to Yosemite National Park, and the pilot project is not provided.

Recommendation: Include a detailed description of the Yosemite Regional Transportation System (YARTS), its relationship to Yosemite National Park, and the pilot project under “Transportation” in Chapter 3: Affected Environment of the SEIS. Recommendation: Provide a more detailed discussion of the cumulative impacts of YARTS on transportation and air quality of the five Alternatives.” (Environmental Protection Agency, San Francisco, CA - #10295)

Response: As a separate project that would require independent National Environmental Policy Act and California Environmental Quality Act process, the Yosemite Area Regional Transportation System (YARTS) has been generally described in the *Yosemite Valley Plan/SEIS* as a project with potential cumulative relationships (see Appendix H). Specific actions and potential impact associated with YARTS would be fully disclosed and evaluated in a forthcoming environmental compliance document.



Section 4.14 ~ Noise

Natural quiet is a quality of the Yosemite National Park experience valued by many respondents. “The land in the national parks was there before humans, and the parks should reflect nature before humans,” writes one person. To this end, not only should the *Final Yosemite Valley Plan* emphasize natural quiet, but, according to many, the National Park Service should develop a detailed noise abatement plan for the park. Such a plan might include additional restrictions on aircraft, vehicles, and equipment in Yosemite Valley.

Other people move beyond generalities to address specific sources of noise in Yosemite Valley—primarily being diesel buses and aircraft. First, according to some, part of the Park Service’s commitment to addressing and reducing noise would entail requiring noise abatement devices on all buses (see Section 4.13.10 for related comments on buses and noise). Second, some mention the noise created by military aircraft as a source of extreme irritation. One person suggests that the National Park Service coordinate with the National Guard to eliminate overflights of Yosemite Valley.

407. Public Concern: The *Yosemite Valley Plan* should emphasize natural quiet in Yosemite Valley

“Just as a man’s home is his castle, a woman’s home is her refuge. This difference in philosophies can be experienced in any large department store. It is right in the center of a floor. Note the bright lights, hard surfaces, broad open spaces where the activities of a playing fields can be simulated. Loud sounds from the audio entertainment next door. Next, check out ladies intimate apparel, over in a corner, away from traffic. Note the fragrance, the muted, expectant hush, the plush surfaces, the feeling of privacy. With even more private booths to safeguard this reality, which of these feels more like a refuge? Yosemite Valley is in a quiet, out of the way place. In its undisturbed state it is soft, hushed, fragrant. Clearly, Mother Nature means it to be a refuge. The din and drone of commercial exploiters fills most of our lives most of the time. Visitors to Yosemite Valley need to be protected from such interference before they can begin to listen to the soft, still voices of the Valley spirits. To this end, I recommend that the Draft plan be revised with a strong commitment to ensuring the preservation of the natural absence of noise.” (Individual, No Address - #3837)

“The Land in the national parks was there before humans, and the parks should reflect Nature before humans. Nature is usually quiet except for short interruptions caused by storms, avalanches, etc. Therefore natural areas should be quiet. National parks should allow people to see a different life than their normal daily life.” (Individual, Wooster, OH - #314)

Response: Noise is defined as human-caused sound. The act of permitting visitors into Yosemite Valley to enjoy this natural resource results in varying degrees of noise. The control of human-caused noise was one of the considerations during the development and analysis of the *Final Yosemite Valley Plan/SEIS*. Noise control measures considered included the concentration noise sources, the elimination of old buses and their replacement with newer and quieter buses, and the minimization of vehicle access.

577. Public Concern: The National Park Service should develop a noise abatement plan for Yosemite National Park.

“The Yosemite experience is as driven by sound as much as by sight. I encourage you to construct an extremely strict noise abatement plan that is as hard on you as it is on the public. Here is my short list for consideration.

- Prohibit the hours for garbage pick up and delivery of heavy goods, etc. to mid-day, mid-week.
- Curtail helicopter flights in and out of Yosemite Valley for anything but truly life-threatening situations. Stabilized patients can be transported to Foresta by ambulance for evacuation.

- Prohibit rangers from using sirens to pull over offenders unless all other methods fail.
- Do not use industrial vacuums to recycle road gravel.
- Purchase electric vehicles for all light maintenance work.
- Restrict deliveries of freight by vendors to dead of night or mid-day as appropriate.
- Use, or encourage use of, proven alternative technology vehicles to not only reduce emissions, but noise as well.
- Establish and enforce strict noise pollution standards on the public and concessionaire as far as possible. Quiet hours in campgrounds, noise level restrictions for engines—including RVs, motorcycles, hot rods, etc., can and need to be enforced.” (Individual, Lafayette, CA - #4499)

Response: This concern is acknowledged; however, a noise abatement plan is outside of the scope of the *Yosemite Valley Plan*. The control of human-caused noise was one consideration during development and analysis of the *Yosemite Valley Plan*. Noise control measures considered include the concentration of noise sources, the elimination of old buses and their replacement with newer and quieter buses, and traffic reduction.

273. Public Concern: The *Yosemite Valley Plan* should address the noise pollution effects of diesel buses in Yosemite Valley.

“If one climbs the Valley walls the noise impact that hits one’s ears is not automobiles but buses, trucks and construction equipment. Try it if you don’t believe me. The noise impact of replacing cars with many more diesel buses is going to be quite negative, even if total traffic is cut down. I didn’t see this addressed but didn’t read all the details.” (Individual, No Address - #6763)

Response: The *Final Yosemite Valley Plan/SEIS* does address noise-related effects in Vol. IB, Chapter 4, Environmental Consequences. The *Final Yosemite Valley Plan/SEIS* seeks to accommodate visitor travel needs while protecting natural resources such as air quality and natural soundscapes. The *Final Yosemite Valley Plan/SEIS* is committed to selecting buses that would minimize noise emissions. The availability of proven transit vehicle technology, supporting infrastructure (such as refueling and maintenance facilities), environmental characteristics (including air emissions and noise levels), and costs would be major factors in decisions related to transit vehicle selections. (Also see response to concern #407 addressing noise, and concerns #1045, #1046, and #1047 addressing air quality.)

236. Public Concern: The *Yosemite Valley Plan* should require noise abatement devices on all buses in Yosemite Valley.

“My experience in hiking out of the valley is that once you are more than one quarter mile from a road, the vehicles you can hear the most are the booming buses, and once in a while a motorcycle or truck. The same noise will annoy users of a new Southside trail, not far from Southside Drive. There should be a noise limit on each bus that enters the main part of the valley, forcing them to build a better muffler, including commercial tour buses. Buses will be running from early in the morning to very late at night, a peak rate of one every 1.3 minutes at the transit center. It only takes one loud bus to disturb sleeping campers. Urban bus drivers typically floor the throttle after most stops. One cruising diesel bus genially puts out 82 dBA at 50’ whereas a typical car is about 70 dBA. Since each additional 3 dB means the sound has doubled, that means that one bus is equivalent to 16 simultaneous cars (12 dBA difference equates to 4 doublings and 2 to the fourth power is 16). However, at most times in the valley, cars are spread out enough that you aren’t close to 16 revving cars at the same time. So each new bus will cause a new loud noise surge whenever it goes by.” (Individual, San Diego, CA - #3479)

Response: Shuttle bus operating details, vehicle characteristics, and management of noise from commercial tour buses are outside the scope of this planning effort. The noise impacts associated with each alternative are documented in Vol. IB, Chapter 4, Environmental Consequences. The *Final Yosemite Valley Plan/SEIS* seeks to accommodate visitor travel needs while protecting natural resources such as air quality and natural soundscapes. The availability of proven transit vehicle technology, supporting infrastructure (such as refueling and maintenance facilities), environmental characteristics (including air



emissions), and costs are all major factors in decisions related to transit vehicle selections for in-Valley and out-of-Valley shuttles that would be implemented under the Preferred Alternative. (Also see response to concern #407.)

444. Public Concern: The National Park Service should reduce military aircraft noise in Yosemite Valley.

“You need a plan to reduce military practice runs close to the Valley. On my last visit, Friday, May 12, I was disturbed by loud fighter aircraft noise at about 12:30 p.m. As I remember from 20 years ago, the Fresno Air National Guard pilots fly on Friday afternoon. You need to reason with them or whatever military pilots fly low over the Park about the impacts on them that irate visitors can have on their Congressionally provided budget.” (Individual, Twain Harte, CA - #7633)

Response: This concern is acknowledged; however, it is outside the scope of the *Final Yosemite Valley Plan/SEIS*. This concern is being addressed on a national level by the National Park Service.

Section 4.15 ~ Social and Economic Environments

This section includes a discussion of the comments that were made regarding the relationship of the *Yosemite Valley Plan* and local community stability, visitor population characteristics, and regional economic conditions.

4.15.1 ~ Local Communities

The potential effects of the *Yosemite Valley Plan* on communities outside Yosemite Valley concern many respondents. These people generally feel that the National Park Service needs to improve its socioeconomic analysis in the *Final Yosemite Valley Plan/SEIS*. This analysis, they argue, must detail how specific employee housing and transportation proposals may affect the demand and funding for services in surrounding communities such as El Portal, Wawona, and Fish Camp. Charging the National Park Service with an “inadequate understanding of the nature of the communities and how services are delivered,” the Mariposa County Board of Supervisors requests that the plan analyze how relocating employees to El Portal will impact library services provided by the School District and the County of Mariposa.

Several people question the National Park Service’s methodology for the socioeconomic analysis in the *Draft Yosemite Valley Plan/SEIS*. For some respondents, it is not clear whether interviews conducted for this analysis exclusively focused on National Park Service and concessioner employees who live in local communities. They believe that the National Park Service should analyze the impacts of the plan on local residents who are not park employees, particularly Wawona residents. Addressing another concern related to the Wawona community, one person suggests that the park service not include hotel guests when calculating the population of Wawona.

The effects of the plan on day-use visitation in Yosemite Valley also elicited some comments. Claiming that implementation of the plan will increase the number of overnight visitors in the Valley, one person suggests that the National Park Service conduct a more thorough analysis of the social impacts resulting from increased visitation. Additionally, one business representative asserts that the potential for increased day-use visitation resulting from population growth in California’s Central Valley should be addressed in the *Final Yosemite Valley Plan/SEIS*.

The Mariposa County Unified School District expresses several concerns regarding the effects of employee housing proposals on area school facilities. In particular, the District asserts, “State funding mechanisms do not provide adequately for the changes in student population and location that will occur during the implementation of the Yosemite Valley Plan.” The National Park Service, the District further suggests, must not only reimburse the District for the funds used to accommodate increased numbers of students but also build additional school facilities where population growth occurs.

192. Public Concern: The National Park Service should improve its analysis of the impacts of the *Yosemite Valley Plan* on communities outside Yosemite Valley.

“One separate aspect of the EIS, as summarized, also bothers us. The EIS apparently does not study the environmental and socio-economic impacts on the neighboring communities of adopting any of the ‘action alternatives,’ which involve pushing a great deal of housing, parking, and demand for other services outside the Park’s boundaries. We do not believe that it is legally or socially/politically acceptable to ignore those rather



obvious, substantial, consequential off-Park impacts, before the decision authority makes his final decision on the Plan. The EIS should be supplemented to adequately cover these impacts.” (Individual, Alexandria, VA - #1276)

“The Valley Plan lacks a complete analysis of the socioeconomic impacts of relocation of personnel to Foresta, El Portal, Wawona and surrounding communities. Additionally, there is a lack of analysis and a failure to recognize that some of those relocated employees will impact other communities. It is not enough to say for example, that law enforcement needs will increase, the Valley Plan should also analyze the way in which the Park Service and the affected local entity acting together can provide the funding needed for additional services. The failure to properly analyze the effects of relocation on surrounding communities indicates a lack of understanding of the services provided to County residents. We believe that while some of the impacts are addressed, the conclusions contained in the Valley Plan relative to the socioeconomic impacts of relocation are minimized due to the inadequate understanding of the nature of the communities and how services are delivered. By way of example, relocating a significant number of individuals to the El Portal community will significantly impact library services provided by the School District and the County of Mariposa. The library is currently located in school facilities, and any significant increase in use will create conflicts between library users and school operations.” (Mariposa County Board of Supervisors, Mariposa, CA - #6060)

“The plan does not address the ‘necklacing effect’ of the new developments at Fish Camp, El Portal, Hazel Green, Rush Creek, Lee Vining, and June Lake. What kinds of pressures will these put on the Park and on the gateway communities?” (Conservation Organization, Mariposa, CA - #6108)

Response: The *Draft and Final Yosemite Valley Plan/SEIS* evaluated the socioeconomic impacts of each alternative on communities outside Yosemite National Park in two ways. First, impacts on local community services and infrastructure were evaluated, as were impacts on regional economies. Second, impacts to communities were considered in the cumulative impact analysis. The cumulative impact analyses evaluated combined impacts of other expected development projects (located both in and outside of Yosemite National Park) and impacts of an alternative to evaluate whether they have any additive effects on the resource. Vol. II, Appendix J of the *Final Yosemite Valley Plan/SEIS* also discusses the difficulties associated with projecting future visitor demand and visitation for the proposed alternatives.

630. Public Concern: The National Park Service should conduct an analysis of the social impacts of the *Yosemite Valley Plan* on local community members other than NPS and concessioner employees.

“Local communities were supposedly studied by gathering ‘descriptive information on the social environment of Yosemite Valley, El Portal, and Foresta and on residents’ perceptions of the social impacts of the proposed relocation of housing out of Yosemite Valley. Because mostly primary concessioner employees would be affected, interviews focused on these employees.’ If I read this correctly, the residents of these towns, whose perceptions you are gauging, are all employees of the park (NPS and concessionaires). Is this true? Why didn’t you survey any of the residents of these towns who don’t work for the park? The exclusion of Wawona in your process is another glaring deficiency. As far as I have heard, current residents of Wawona are almost unanimously opposed to the location of employee housing in their town. The National Park Service needs to conduct a social analysis of the impacts of the Yosemite Valley Plan on non-park employees and the town of Wawona.” (Individual, No Address - #7401)

Response: For an understanding on the potential impacts to the social environment of Wawona related to the development of employee housing, the National Park Service evaluated the *Wawona Town Planning Area Specific Plan/Final Environmental Impact Report*. This document clearly states that Wawona would be used for “expanded use” for employee housing. The document also fully acknowledges that there would be “substantial growth” in employee housing if housing was not available outside the park. Notwithstanding, the *Wawona Town Planning Area Specific Plan/FEIR* makes no mention of or reference to the community opposing the development of employee housing.

484. Public Concern: The National Park Service should not include hotel guests when calculating the population of Wawona.

“The NPS estimates that the population in summer and winter in Wawona is approximately 1,130 and 420, respectively (including hotel guests). According to census takers: hotel guests are never considered to be part of a community’s population. Furthermore, note that the number of full-time residents along Forest Drive is probable only 10 to 15.” (Non-Governmental Organization, Wawona, CA - #7882)

Response: The National Park Service has changed its calculation to reflect just the residents of Wawona in the impact analyses conducted for the *Final Yosemite Valley Plan/SEIS*.

609. Public Concern: The *Yosemite Valley Plan* should include a thorough analysis of the social impacts resulting from increased visitation.

“Regarding visitor populations, the Executive Summary states, ‘The equivalent of a 2.6% decrease to 1998 overnight visitation would be expected, representing a long-term, moderate adverse impact.’ (page 4-62 ES) Under Alternative 5, it states, ‘The equivalent of a 20.8% increase to 1998 overnight visitation would be expected, representing a long-term, major beneficial impact.’ (page 4-62 ES) How does the increase of overnight visitation ‘improve the existing environment’ of visitor populations? Does it not just add to the crowding and congestion that this plan is ostensibly designed to decrease? Again, it appears as if the NPS is only concerned with the number of visitors when determining social impacts, totally disregarding the increased strain on resources, overcrowding, and environmental degradation that accompany people and their vehicles into the park. The NPS needs to do a much more thorough analysis of the social impacts that increased visitation creates.” (Individual, No Address - #7401)

Response: The *Final Yosemite Valley Plan/SEIS* evaluates in two ways the socioeconomic impacts of each alternative on the communities outside Yosemite National Park. First, the impacts on local community services and infrastructure are evaluated as are the impacts on the regional economies. Second, the impacts to the communities are also considered in the cumulative impact analyses. The cumulative impact analyses evaluate the combined impacts of other expected development projects (both in and outside of Yosemite National Park) and the impacts of an action alternative to determine if they have any additive effects on the resource.

367. Public Concern: The *Yosemite Valley Plan* should account for the impacts of Central Valley population growth on day-use visitation in Yosemite Valley.

“Residential growth within California’s Central Valley was not addressed in the Plan, nor was the placement of a University of California campus at Merced. These changes will surely increase day-use visitation to Yosemite from SR 140.” (Business, Yosemite National Park, CA - #3962)

Response: The social and economic affected environment considered in the *Final Yosemite Valley Plan/SEIS* included the five counties surrounding Yosemite National Park. These counties were selected because of their direct relationship to the park and the potential that they could be affected by actions of the *Final Yosemite Valley Plan/SEIS*. Additionally, the cumulative impact scenario in the *Final Yosemite Valley Plan/SEIS* did consider potential impacts in eight surrounding counties, four national forests and five cities (see Vol.II, Appendix H). Many projects considered in the cumulative scenario related to future population growth of the region. Growth in the community of Merced and the development of University of California, Merced were also considered.

412. Public Concern: The National Park Service should ensure adequate funding for Yosemite National Park schools during implementation of the *Yosemite Valley Plan*.

“The District’s primary concern is how the three park schools, El Portal, Yosemite Valley and Wawona, will be impacted. MCUSD is committed to providing the best possible education for all of its students, and the Park Service and Concessionaire have acknowledged the need for quality educational services to attract quality employees. State



funding mechanisms do not provide adequately for the changes in student population and location that will occur during the implementation of the Yosemite Valley Plan. Therefore, the National Park Service through the Secretary of Interior must reimburse the District for encroachments during this lengthy process.” (Mariposa County Unified School District, Mariposa, CA - #4498)

Response: According to the evaluation in the *Final Yosemite Valley Plan/SEIS* the potential economic impacts to the Yosemite Valley, Wawona, and El Portal Schools, would be based upon future school enrollments that may change as a result of actions of the *Yosemite Valley Plan*. It is expected that enrollment would be accommodated with existing school facilities. Therefore, additional funding is not expected to be needed for improvements or operational changes associated with actions under the *Yosemite Valley Plan* (see Vol. IB, Chapter 4, Environmental Consequences).

413. Public Concern: The National Park Service should build additional school facilities in areas where growth occurs.

“MCUSD has, in previous responses to prior plans, noted that the National Park Service must be prepared to build additional school facilities where growth occurs. State law establishes the right of parents to have their K-3 students educated at the facility closest to their place of daily employment.” (Mariposa County Unified School District, Mariposa, CA - #4498)

Response: The evaluation of potential economic impacts to the Yosemite Valley, Wawona, and El Portal Schools has projected that future school enrollments that may result from the direct actions of the *Yosemite Valley Plan* would be accommodated with the existing school facilities. Therefore, it is not projected that additional funding would be needed for improvements or operational changes in association with actions of the *Yosemite Valley Plan*. This analysis can be found in Vol. IB, Chapter 4, Environmental Consequences.

Should other events occur or conditions change as a result of actions not related to the *Yosemite Valley Plan*, and thereby cause an impact to the economic condition of the Yosemite Valley or El Portal schools, then those issues would be addressed at that time in accordance with Mariposa County Unified School District or National Park Service policy.

4.15.2 ~ Visitor Population

Several people who commented on the *Draft Yosemite Valley Plan/SEIS* question specific planning assumptions and conclusions in the visitor population analysis. In particular, one person believes that the *Draft Yosemite Valley Plan/SEIS* creates the “false impression that low-income people tend to be the prime users of facilities such as Housekeeping Camp and Camp Curry.” This assumption is incorrect—use patterns actually reflect that low-income visitors typically camp or take day trips to Yosemite Valley, this person argues. Offering a different critique, the Madera County Board of Supervisors recommends that the National Park Service complete all visitor use and demographic studies before implementing an alternative from the plan.

The need to ensure environmental justice in Yosemite Valley planning efforts also was reflected in some respondents’ comments. Several people call attention to a perceived lack of emphasis on providing opportunities for low-income and minority people to visit the Valley. The National Park Service, they assert, is discriminating against these groups through its proposals to increase expensive lodging accommodations and decrease low-cost camping sites. In the vehement words of one respondent, “The Park Service’s total disregard for Executive Order 12898 is, by far, the most egregious error in Yosemite Valley Plan’s socioeconomic analysis of the preferred alternative.” In order to address the under representation of low-income and minority people in

the park, one person exhorts the National Park Service to establish programs that strive to increase visitation from these groups.

607. Public Concern: The National Park Service should reevaluate its conclusion in the *Yosemite Valley Plan* that low-income people are the primary users of Housekeeping Camp and Camp Curry.

“This and other similar reports have painted the false impression that low-income people tend to be the prime users of facilities such as Housekeeping Camp and Camp Curry. That is not so. I was Vice President of Communications (marketing) for the Yosemite Park and Curry Co. during the ‘80s and ‘90s and know from first-hand analysis that while some visitors to these camps . . . are of low income, most are of moderate to affluent means. People of low income do not tend to stay at either Housekeeping Camp or Camp Curry, they camp, take day trips or do not visit at all. That they do not visit is more a matter of cultural pattern than it is of the price of these camps. . . The suggestion that the low price helps people of low income is absolutely specious and is clearly discredited by the fact that to reserve a space at highly popular Housekeeping Camp, you must provide a deposit for one night’s stay a year and a day in advance of visit. And, reservations for these sites sell out almost immediately. Few people of low income can place that kind of deposit a year in advance of visit.” (Individual, No Address - #7215)

Response: The National Park Service has received a number of comments from members of the public who relate the retention of affordable rustic lodging at Curry Village and Housekeeping Camp to park visitors with lower incomes. The *Draft* and *Final Yosemite Valley Plan/SEIS* evaluate potential impacts to minority and low-income visitors in Vol.IB, Chapter 4, Environmental Consequences.

356. Public Concern: The National Park Service should complete all sociological studies necessary to support planning assumptions prior to a *Yosemite Valley Plan* decision.

“Complete any and all sociological studies that will scientifically support visitor use planning assumptions including recreational patterns of low income and non-Anglo populations, visitor demand and attitudes, etc. Such studies should be part of a comprehensive Visitor Experience and Resource Protection study conducted first, in preparation for planning—not within five years after a Record of Decision.” (Madera County Board of Supervisors, Madera, CA - #4284)

Response: The *Final Yosemite Valley Plan/SEIS* identifies areas of sociological research that the National Park Service would like to pursue in the future, both as part of the ongoing effort to better understand the dynamic character of park visitation and as part of the Visitor Experience and Resource Protection process (see Vol. IA, Chapter 2, Actions Common to All Action Alternatives – Visitor Use in Yosemite Valley, and Visitor Experience – Orientation and Interpretation). Data collection for visitor statistics, preferences, and background, as well as resource protection studies, must be ongoing. However, it is neither prudent nor sensible to wait until the National Park Service has additional data before proceeding with Yosemite Valley planning because both visitor experience and the integrity of ecological and cultural resources would suffer. While there would certainly be value in having the next 5 years of results from this research, current data is sufficient for the level of actions proposed by the *Final Yosemite Valley Plan/SEIS*, which is also driven by concern for highly valued resources and impacts to those areas are already well documented.

(Also see response to comment #472.)

652. Public Concern: The *Yosemite Valley Plan* should comply with Executive Order 12898.

“The Park Service’s total disregard for Executive Order 12898 (Environmental Justice) is, by far, the most egregious error in YVP’s socioeconomic analysis of the preferred alternative. Economic Justice, Minority and Low Income Visitors warrants a whopping three paragraphs in your entire four volume plan. The study you cite points out the dearth of non-Anglo and poor visitor (3.6 and 5% respectively), despite the large number of these demographics in



the surrounding region and state. ‘The data illustrate that people from low income households are largely under-represented in the population of visitors to Yosemite National Park.’ Your cited study suggested that the lack of ethnic diversity in Yosemite visitation ‘was probably the result of a ‘combination of economic restraints among ethnic minorities. . .’ (page 3-117, Volume 1A) You know that the park is an expensive vacation for most, you know that the lack of poor and minority populations is due to economic constraints, but you provide no analysis of what the NPS is doing to rectify this situation. In fact, you chose a preferred alternative that increases overnight, expensive lodging, and decreases low cost camping options. Such a move adversely impacts indigenous and minority populations, in direct violation of EO 12898. Three paragraphs stating the obvious is hardly an analysis of environmental justice. Low income and minority populations are being discriminated against by your alternative and no analysis, acknowledgement, or mitigation is offered. This is definitely a litigable offense.” (Individual, No Address - #7401)

Response: As discussed in the “Minority and Low Income/Environmental Justice” section of the *Final Yosemite Valley Plan/SEIS*, impacts are presented in accordance with EO 12898. However, to some degree data limitations on minority and low-income populations constrain the extent that future impacts on these populations can be assessed.

Although some adverse impacts to minority and low-income populations are expected, these impacts do not represent environmental justice impacts since no aspect of any action alternative of the *Final Yosemite Valley Plan/SEIS* is expected to result in a “disproportionately high and adverse human health or environmental effects” (EO 12898. Sec 1-101) on minority or low-income populations. Any restrictions on travel, lodging accommodations, or access to any area of the park that might result from the *Yosemite Valley Plan* would be equally applied to all visitors, regardless of race or economic standing.

In response to public concerns about possible adverse effects on minority and low-income populations, the total number of rustic and economy in-Valley lodging and camping facilities have been increased in the Preferred Alternative (Alternative 2) of the *Final Yosemite Valley Plan/SEIS*. This increase would improve the availability of overnight accommodations within the Valley for minorities and low-income visitors, thereby lessening adverse impacts to these visitors.

420. Public Concern: The *Yosemite Valley Plan* should include provisions designed to increase Yosemite National Park use by minorities, low-income people, and troubled youth.

“Increase use of the park by minorities and low-income people. This is somewhat counter to your need to decrease use, but, the United States will never become fully integrated until all of our major institutions and resources are integrated. Racism is alive and well in the United States, and while I expected Yosemite to be mostly white, I was stunned to see only 7 African-Americans in six days there, and one of them was my neighbor who I brought. He is a good kid, and does well in all-white situations, but was sad to realize that 10% of the US population is so disenfranchised that they don’t even know about Yosemite. Also, Park use by low-income people is a problem you mention lightly, but don’t address. It is also critical that we protect the rights of the poor to enjoy all of the benefits of being a citizen. So reaching out to some groups like Outward Bound etc . . . who help low-income kids improve their life by learning about and enjoying nature is a great idea. And, of course, if you could do some environmental education so they will return to the urban inner city ready to contribute to a healthy environment, so much the better. Programs like these could be targeted to low-use times of the year, and you could rely more heavily on non-valley locations for their implementation. Get a lot of help on this - working with troubled youth is a challenge not to be undertaken lightly.” (Individual, Washington, DC - #4853)

Response: In response to public concerns about possible adverse effects on minority and low-income populations, the total number of less expensive in-Valley lodging and camping facilities has been increased in the *Final Yosemite Valley Plan/SEIS* to improve the availability of rustic and economy overnight accommodations within the Valley.

4.15.3 ~ Regional Economies

The relationship between the *Yosemite Valley Plan* and gateway communities' economic stability is a key theme expressed in public comments. Several respondents view proposals to reduce overnight accommodations and automobile traffic in the Valley as disincentives for people to visit this area. Declaring that gateway communities are often dependent on tourist dollars from Yosemite visitors, one U.S. Representative asserts, "As the Park Service implements plans that discourage rather than encourage visitation, the gateway communities are the most directly impacted." The National Park Service, some respondents contend, must analyze the economic effects of limiting auto touring along traditional travel routes on gateway communities.

368. Public Concern: The *Yosemite Valley Plan* should address the economic effects of decreased lodging on gateway communities.

"The Valley Plan calls for a 38% reduction in overnight lodging from the pre-flood levels, resulting in 981 lodging units and 465 campsites permitted in the plan. In addition, employee housing is not adequately addressed in the alternatives. The elimination of so many lodging units will have a significant negative effect on the local economy in the long term. As people find out that it is increasingly difficult to obtain lodging in Yosemite Valley, the number of visitors will continue to be reduced. The economy in the gateway communities is largely dependent on tourism, and Yosemite is certainly the major attraction. As the Park Service implements plans that discourage, rather than encourage visitation, the gateway communities are the most directly impacted." (U.S. Representative, Fresno, CA - #2951)

Response: The *Final Yosemite Valley Plan/SEIS* evaluates the expected economic effects of each of the proposed alternatives on the region's economy. The socioeconomic impact analyses and conclusions are presented in the visitor populations and regional economies sections of Vol. IB, Chapter 4, Environmental Consequences of the *Final Yosemite Valley Plan/SEIS*. The impact analysis evaluates the effect that changes in visitor spending is expected to have on the economies of each of the five counties in the Yosemite region. This analysis and its results are presented in the visitor spending section in Chapter 4.

428. Public Concern: The *Yosemite Valley Plan* should address the economic effects of limiting auto touring on gateway communities.

"Economic impact on gateway communities should be studied. The NPS proposes to limit the preferred mode of access, 'auto touring' without studying the cumulative impacts of such a policy on gateway communities who rely on tourist dollars for economic viability. The YVP fails to address the potential adverse economic impacts on Groveland and the State Route 120 corridor from reduced tourist traffic to and from Yosemite along this traditional travel route. . . These omissions, which address the inevitability of other Sierra Nevada tourist locations that don't restrict auto access becoming recipients of displaced and inconvenienced auto tourists at the expense of Yosemite's gateway communities, should be investigated." (Tuolumne County Board of Supervisors, Sonora, CA - #4436)

"I am very concerned that the gateway community of Groveland will suffer unduly from the existing plan for Yosemite. It looks like the drive-through traffic that sustains this special community will be lost under the proposed plan. That would be a devastating economic blow for Groveland/Pine Mountain Lake where the community depends on the Yosemite business. The economic impact would be severe. These are not businesses owned by chains. Why give a monopoly to a few or even one bus line, over the economic impact to the entire area around Groveland?" (Individual, No Address - #3363)

Response: The *Final Yosemite Valley Plan/SEIS* evaluates the expected economic effects of each of the proposed alternatives on the region's economy. The socioeconomic impact analyses and their conclusions are presented in the visitor populations and regional economies sections of Vol. IB, Chapter 4, Environmental Consequences, of the *Final Yosemite Valley Plan/SEIS*.



Section 4.16 ~ Park Operations, Facilities, and Housing

Section 4.16.1 includes comments on the location of National Park Service facilities, maintenance of facilities, and park administration. Concerns regarding the location and condition of employee housing are detailed in Section 4.16.2.

4.16.1 ~ Operations and Facilities

The location and upkeep of National Park Service and concessioner facilities are of primary importance to numerous respondents who are concerned about the management of Yosemite National Park. Members of the public differ on whether they believe it would be most advantageous to relocate facilities and personnel stationed in the park or leave staff and support complexes where they are. Respondents in favor of the status quo argue that it is more effective to keep administrative personnel, managers, maintenance facilities, and other buildings close to the people and sites they support. Others maintain that for symbolic reasons the park headquarters and superintendent's home should remain in the Valley. Those in favor of reducing the 'human footprint' in the Valley assert that removing staff and associated developments will allow, "what development must occur . . . to concentrate on serving the visiting public." One person encourages the Park Service to include an explicit strategy in the *Final Yosemite Valley Plan* to relocate Park Service and concessioner headquarters. Stationing park and concessions maintenance facilities in the area currently used to store wood, suggests another, would go a long way toward concentrating facilities in one area.

The placement of maintenance facilities engenders strong feelings among respondents. Several people call for the removal of the old sewer plant. The Wawona maintenance yard, another person points out, may have cumulative effects on other resources, especially if the yard will be used to store vehicles more often in the future. One person urges the Park Service to make use of formerly privately owned land and cabins that are now federal property; perhaps these sites could be used for facilities that are not desired in other locations.

Visitors would like to find clean, well-maintained facilities when they visit a national park. Many respondents request that the Park Service invest more time in the upkeep of roads, trails, and buildings. The El Capitan picnic area dumpsite, one person insinuates, is a problem and should be cleaned up. In apparent recognition of the Park Service's limited resources, one respondent recommends that a volunteer trash collection program be established. Hazardous waste sites weigh heavily on the mind of one respondent who would like the Park Service to address cleanup of these sites and allocate funds for cleanup.

Numerous individuals express their perception that there are not enough rangers working in Yosemite National Park. These respondents imply that increases in ranger staffing levels would lead to decreased violations and an improved visitor experience. Offering another service-related suggestion, one respondent asks the Park Service to make more information available over the telephone and Internet so that it will be easier to plan ahead for trips.

The relationship between the concessioner and the National Park Service elicits many responses. People worry that the Park Service is serving the concessioner by supporting additional developments and generally helping to ensure that the concessioner makes a profit. A number of individuals wonder if accommodation of the concessioner is consistent with the Park Service's mission. One person asks, "How does this fit into the National Park Service mission to preserve

and protect the park or is this a plan to preserve and protect the concessioner?" According to another respondent, "You are quickly becoming the servants of your concessioners and we, the taxpayers of this nation, deserve better." Another person observes that, "In 1998 the gross revenues of the Yosemite Concession Service Company, were \$87.8 million" and wonders how many "public dollars go to this business to provide improvements and other projects . . . all at the taxpayer's expense?" Visitors express a dim view of the behavior and quality of Yosemite Concession Service employees. Patrons of Yosemite would like YCS to use more discretion when hiring and overseeing their employees.

53. Public Concern: The *Yosemite Valley Plan* should retain Yosemite National Park Headquarters in Yosemite Valley.

"I think it would be wise to keep the NPS headquarters in the Valley, if only for symbolic reasons. For the same reason, the Superintendent should also continue living there." (Individual, Pennngrove, CA - #95)

Response: Although leaving Yosemite National Park headquarters in Yosemite Valley would indeed retain an important symbol in the Valley, it is not necessary or essential for it to be located in the Valley (see Vol. IA, Chapter 1, Goals and Criteria). Furthermore, Congress passed a law in 1958 establishing the El Portal administrative site (see Vol. II, Appendix A) for the purpose of moving park administrative facilities outside Yosemite Valley.

727. Public Concern: The *Yosemite Valley Plan* should not require the removal of National Park Service or concessioner administrative buildings and personnel from Yosemite Valley.

"The draft YVP/SEIS calls for the eventual relocation of both headquarters out of the Valley to El Portal. From a logical corporate management standpoint, this move is unacceptable. In the operation of any business location, lower and middle management personnel can usually take care of routine problems on the spot as they occur daily. However, top level corporate management is required to make decisions involving critical actions. . . Usually these extreme actions require on the spot decisions, with timing often being a critical factor. This immediate critical response cannot be made effectively when corporate management is physically located at a remote location." (Individual, American Canyon, CA - #907)

"Concession headquarters needs to remain in valley; not necessarily in the village. . . Personnel, training, and payroll issues need to be handled conveniently, not via a bus ride out of valley. Out of the valley makes no sense!" (Individual, Yosemite, CA - #201)

MAINTENANCE AREA

"NPS Maintenance area. Keep the snow plows and the ability to fix them in the valley... also the sandbags and materials to handle emergencies when the El Portal road is closed. It makes no sense to have sandbags stored in El Portal when there's a flood and high water on the roads already! Keep all garage and maintenance activities in one place; it makes no sense to have two facilities duplicating operations. Also, if a vehicle is broken, you don't want to try to drive it to El Portal! Put a garage complex in NPS' area." (Individual, Yosemite, CA - #201)

Response: The goals of the 1980 *General Management Plan* include removing nonessential facilities from Yosemite Valley. The *Final Yosemite Valley Plan/SEIS* proposes to "remove unnecessary facilities from and locate new facilities outside of highly valued resource areas unless there are no feasible alternatives." Additionally, it calls for removal of National Park Service headquarters and other functions not essential for Yosemite Valley operations from the Valley. National Park Service and concessioner administrative buildings and personnel functions were evaluated and not found to be essential to Valley operations. The impacts and benefits of relocating these functions were considered. (See *Final Yosemite Valley Plan/SEIS*, Vol. IA, Chapter 1, Purpose of and Need for the Action.)



340. Public Concern: The *Yosemite Valley Plan* should require the removal of National Park Service and concessioner administrative buildings and personnel from Yosemite Valley.

“There are some good options for the park that are not considered in any of the plans. . . Removal of National Park Service administrative buildings and personnel as well as concession administration buildings and personnel to Wawona.” (Individual, Coulterville, CA - #3724)

“I want to see the park headquarters, concessionaire’s headquarters, hospital, maintenance facility, automotive garage next to Yosemite Village, and much of the employee housing moved out of the valley. This will open up much needed space for park visitors.” (Individual, El Dorado, CA - # 243)

“Relocating administrative personnel outside of Yosemite Valley makes sense if they have no need to be within the Valley.” (Individual, Arroyo Grande, CA - #3555)

“I agree with efforts to reduce the presence of staff and concessionaires in the Valley itself. . . As the Draft YVP SEIS notes, it is not feasible to host all employees and staff outside of the Park or the Valley – but certainly every effort should be made to reduce such a footprint to the smallest possible area. This will in turn allow what development must occur (or remain) to concentrate on serving the visiting public.” (Individual, Mill Valley, CA - #223)

Response: Goals of the 1980 *General Management Plan* included removing nonessential facilities from Yosemite Valley. The *Final Yosemite Valley Plan/SEIS* proposes to “remove unnecessary facilities from and locate new facilities outside of highly valued resource areas unless there are no feasible alternatives.” Additionally, the plan calls for removal of National Park Service headquarters and other functions not essential for Yosemite Valley operations from the Valley. The National Park Service and concessioner administrative buildings and personnel functions were evaluated and not deemed to be essential to Valley operations. The impacts and benefits of relocating these functions were considered. (Also see Vol. IA, Chapter 1, Purpose of and Need for the Action.)

396. Public Concern: The *Yosemite Valley Plan* should include an explicit plan for relocation of National Park Service and concessioner headquarters.

“A precise plan for relocation of NPS and Concessionaire headquarters is not detailed within the Plan. Private investors could be motivated to construct attractive and adequate office building in Mariposa, Midpines, the Merced River corridor or El Portal that could accommodate NPS and Concessionaire headquarters, if the NPS would define its needs/desires more adequately.” (Business, Yosemite National Park, CA - #3962)

Response: The *Final Yosemite Valley Plan/SEIS* indicates that the general location for these facilities would be in El Portal. Appendix M of the *Final Yosemite Valley Plan/SEIS* provides information on the sequencing plan for the relocation of various facilities. Specific site design would be accomplished at a later date and through another process that would include public involvement.

338. Public Concern: The *Yosemite Valley Plan* should require the establishment of the National Park Service and concessioner maintenance facilities in the wood yard area.

“There are some good options for the park that are not considered in any of the plans. . . The establishment of Valley maintenance facilities for the National Park Service and concessionaire in the wood yard area.” (Individual, Coulterville, CA - #3724)

Response: Goals of the 1980 *General Management Plan* included removing nonessential facilities from Yosemite Valley. The *Final Yosemite Valley Plan/SEIS* proposes to “remove unnecessary facilities from and locate new facilities outside of highly valued resource areas unless there are no feasible alternatives.” Additionally, the plan calls for removal of National Park Service headquarters and other functions not

essential for Yosemite Valley operations from the Valley. These functions were evaluated and not deemed to be essential to Valley operations. The impacts and benefits of relocating the function were considered.

(Also see Vol. IA, Chapter 1, Purpose of and Need for the Action)

729. Public Concern: The *Yosemite Valley Plan* should require the removal of the old sewer plant.

“Removal of the old sewer plant: This is hardly a new [idea] of course. All four of the action alternatives call for its removal, as did the 1980 GMP. Assuming removal remains in Phase 1 of the implementation plan and funding continues, we look forward to showing our children and grandchildren where the old sewer plant used to sit.”

(Conservation Organization, San Francisco, CA - #4594)

“Remove the sewer plant if not properly functional and consider hauling the sewage out.” (Individual, No Address - #7305)

Response: All action alternatives for the *Final Yosemite Valley Plan/SEIS* would require the removal of the old wastewater treatment plant in El Portal. The removal of the old wastewater treatment plant would allow for the protection of a sensitive cultural resources site. The wastewater treatment plant that was constructed in the late 1970s would continue to be used for treatment of wastewater from Yosemite Valley and El Portal.

(Also see response to concern # 478)

463. Public Concern: The *Yosemite Valley Plan* should address the cumulative impacts of the Wawona maintenance yard on other resources.

“The Wawona maintenance yard and facility serves as a location for a small number of buses during the off-season, as well as road maintenance equipment. While the maintenance yard and facility expansion is not specifically addressed in the Valley Plan, if this area will be used for increased bus and road maintenance vehicles, and equipment storage, then the cumulative impacts must be addressed in detail.” (Individual, Malibu, CA - #7483)

Response: This concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan*. No actions are proposed in the *Final Yosemite Valley Plan/SEIS* to add facilities in the Wawona maintenance yard.

332. Public Concern: The National Park Service should utilize the land and cabins transferred to them from private ownership.

“Utilize the land and cabins that private parties like my family have ‘given’ to the Park. There must be over 20 that have had their leases come up in the last few years. We did not sell our land to the Park because we needed the money. We did it as conscientious citizens for the good of the National Park.” (Individual, Loomis, CA - #3387)

Response: Land and cabins transferred to the National Park Service have been and would continue to be evaluated to determine if continued use is feasible.

728. Public Concern: The *Yosemite Valley Plan* should ensure that existing facilities and areas are properly maintained.

“On a recent trip to Yosemite, we were appalled by the lack of proper maintenance and reduced accessibility of many areas already. The need to walk 2 miles one way to see Mirror Lake, the long hike to Thousand Isles, and the lack of repair to roads and bridges three years after the flood is not acceptable.” (Individual, Anaheim, CA - #269)



CABINS

“The second concern that we have is the maintenance and upkeep of the government-owned cabins. . . I have had government employees complain to me that they can’t get maintenance and repairs done on their cabins. . . It’s a concern to me that the government is talking about building additional housing when employees that are now in the government maintained, or government-owned, houses are not being maintained.” (Public Hearing, Los Angeles, CA - #20338)

Response: This concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan*. The repair, replacement, or relocation of many facilities following the 1997 flood has been delayed, awaiting the completion of this planning effort. A result of this plan would be construction of quality housing for employees by replacing temporary or below-standard units. Day-to-day maintenance of facilities is an operational issue and is subject to priorities and annual funding.

461. Public Concern: The *Yosemite Valley Plan* should address the management of the El Capitan picnic area dumpsite.

“The Park Service’s Preferred Alternative 2 does not address the El Capitan Picnic Area Dumpsite, commonly referred to as ‘Devil’s Elbow’ on the Merced River. Yet, Devil’s Elbow is a significantly large, documented dumpsite that is located along a wide bend of the Merced River in Yosemite Valley. The Merced River directly and continuously impacts the site, and as the river continues to change course, it will continue to erode this site. This is evidenced by the document submitted on April 30, 1992 by Sue Fritzke, Louise Johnson, and Tim Kennedy titled, ‘El Capitan Picnic Area Dumpsite Status Report.’” (Individual, Malibu, CA - #7483)

Response: This concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan*. The El Capitan dumpsite is located east of Devil’s Elbow in Yosemite Valley. A major portion of this dumpsite was removed in 1991 as part of the Merced River ecosystem restoration program. Under the Visitor Experience and Resource Protection program of monitoring and actions common to all alternatives, this area would be monitored for resource or visitor experience degradation. If conditions indicate a degradation of either visitor enjoyment or resource conditions, mitigative actions would be undertaken. These could include archeological data recovery excavation, natural area rehabilitation, and visitor activity reduction. Any decision regarding actions for this area would be made considering natural, cultural, and visitor experience resource values.

251. Public Concern: The *Yosemite Valley Plan* should establish a trash collection program for all visitors in Yosemite National Park.

“Set up a program for all people, not just children, to pick up trash.” (Individual, No Address - #3066)

Response: All trash is collected. Any specific collection plans are beyond the scope of this plan.

457. Public Concern: The *Yosemite Valley Plan* should address remediation plans for hazardous sites in Yosemite Valley.

“Where in the Draft Yosemite Valley Plan . . . are the plans to inspect and remediate these sites? If additional federal funding is needed, where are the plans to request and commit enough dollars to do the job right, once and for all? Is there any reason why these sites cannot be cleaned up now--before new construction begins and many of these sites are developed for visitor use?” (Individual, Malibu, CA - #7483)

Response: Remediation of hazardous waste and distribution of funding are outside the scope of this planning effort. Yosemite National Park has a comprehensive hazardous waste remediation program.

460. Public Concern: The National Park Service should dedicate a portion of funding to remediation of hazardous materials.

“Given the enormous amount of money to be committed to construction activities as proposed in the draft Yosemite Valley Plan, critical funding should be dedicated to the proposed investigation and cleanup of hazardous materials inside park boundaries.” (Individual, Malibu, CA - #7483)

Response: Remediation of hazardous waste and distribution of funding are outside the scope of this planning effort. Yosemite National Park currently has a comprehensive hazardous waste remediation program.

315. Public Concern: The National Park Service should increase the number of rangers in Yosemite National Park.

“Over the years visitor numbers have increased, and the number of Rangers has decreased. This is nonsense. We need, respect and enjoy their presence. Double the number of Rangers!” (Individual, Walnut Creek, CA - #3386)

“In the old days, there was a lot more ranger presence in the campgrounds. I always looked forward to their rounds, and learned a lot from their wisdom. I know that I am a better person and camper from these frequent ranger visits. Now days, the only time that you see a ranger is in the visitor center and they act like tourist guides. I believe it would be much better to have a full time ranger in each of the several campgrounds, where they would act as wildlife and nature specialists and camping guides.” (Public Hearing, Costa Mesa, CA - #4584)

“It used to be that there were more rangers patrolling the camp sites (and probably parking lots) to make sure that food was properly stored. The kids absolutely loved the rangers on horses. Is there less funding for rangers now? Whereas we once received a warning for leaving a jug of water out . . . we now notice fellow campers leaving a lot more than that out and never receiving a warning.” (Individual, San Diego, CA - #7309)

Response: This concern is outside the scope of the *Yosemite Valley Plan*; however, the National Park Service does recognize the need to staff and fund all aspects of operations. The National Park Service makes annual requests for base budget increases. Operational costs associated with the alternatives can be found in Vol. IA, Chapter 2, Alternatives.

307. Public Concern: The National Park Service should ensure that adequate information about Yosemite National Park is available via the telephone or the Internet.

“Improved phone service and more internet information is key to trip planning. I hope those two items are improved in the near future.” (Individual, No Address - #3127)

Response: This concern is acknowledged; however it is outside the scope of the *Yosemite Valley Plan*. While these two subjects are mostly operational in nature, the *Final Yosemite Valley Plan/SEIS* Preferred Alternative recognizes the need for enhanced pre-visit orientation opportunities. In the Preferred Alternative, Visitor Experience—Orientation and Interpretation, improved visit planning resources are proposed as part of an improved visitor orientation sequence.

310. Public Concern: The *Yosemite Valley Plan* should clarify how increases in concessioner services comply with the National Park Service’s mandate to preserve and protect Yosemite National Park.

“There is to be an increase in commercial ventures inside the Park. How does this fit into the National Park Service mission to preserve and protect the Park, or is this a plan to preserve and protect the concessionaire? David Brower said it very well, ‘Yosemite should be a nature center, not a profit center.’” (Public Hearing, Fresno, CA - #20481)



“Your management of the National Park System and of Yosemite in particular, does not serve the American people well. You are quickly becoming the servants of your concessionaires and we, the tax payers of this nation deserve better.” (Conservation Organization, Bend, OR - #7320)

“If concern for the environment were truly a mainstay of the Yosemite Valley Plan, there would be a decrease in commercialization and no reason to note that ‘ . . . proposed changes to visitor services are projected to have a long-term major beneficial net impact on the concessionaire’s gross revenues.’ We fully support the foundational roots of the National Park Service as articulated in the Organic Act of 1916 which calls for protection of the natural and cultural resources while enhancing visitor experience. Consequently, we urge that the expansion of the development ‘footprint’ in the Valley be stopped and only those services determined by careful study as critical to the visitor be retained.” (Conservation Organization, Oakhurst, CA - #4276)

Response: There is no increase in commercial services proposed in the *Yosemite Valley Plan*. In fact, there are significant decreases in lodging facilities and other commercial ventures. (Also see response to concern # 1171.)

395. Public Concern: The *Yosemite Valley Plan* should note whether concessioner profits are reinvested into Yosemite National Park.

“In 1998 the gross revenues of the Yosemite Concession Service Company, a Delaware Corporation, were \$87.8 million dollars! . . . How much of these profits actually return to Yosemite National Park? How much of Yosemite National Park public dollars go to this business to provide improvements and other projects like the Ahwahnee restoration--all at the taxpayer’s expense? Did the Concession Company pay any amount of this restoration, which will serve to richly benefit their company? How much taxpayer’s money is the concession company using to run its business?” (Conservation Organization, Camarillo, CA - #2627)

Response: The level of concessioner profits is an operational issue beyond the scope of the *Yosemite Valley Plan*. Nonetheless, the benefit returned to the park from the primary concessioner was approximately 22% of gross receipts before the January 1997 flood and has been approximately 18% since the flood. The actual percentage of profit retained by the concessioner is a small fraction of the benefit to the park. However, the benefits to the park from the primary concessioner will drop dramatically because of reduced operations and increased costs outlined in various alternatives of the *Yosemite Valley Plan*.

311. Public Concern: The National Park Service should require Yosemite Concessions Services to adequately monitor and police its own staff.

“The NPS is spending an inordinate amount of time monitoring, policing, and responding to YCS employee incidents versus other types of incidents. Given the increased workload created by YCS employee incidents and given that ranger workload is very high during the peak visitation, not enough rangers are available to provide common public services and perform basic job functions. YCS is not doing enough to monitor, police, and control their own staff.” (Public Hearing, Costa Mesa, CA - #20303)

Response: This concern is acknowledged; however, the management of park employees is an operational issue that is beyond the scope of the *Yosemite Valley Plan*. The National Park Service acknowledges that all employers in the park have a responsibility to monitor employee behavior and take effective action regarding inappropriate behavior. Some of the problems that develop relate directly to inadequate employee housing. The *Yosemite Valley Plan* would set the stage for resolving many of those issues.

406. Public Concern: The National Park Service should require more stringent hiring practices for Yosemite Concession Services employees.

“I was disgusted when I learned of the hiring practices of the agency contracted by the NPS. Mannned by a boatload of temporary employees with nothing to lose, this historic park was filled with repeat felons. In a park that is so inviting for the peaceful naturalist, or a family gathering, how can one company employ such violent criminals? My

history has taught me that temporary or seasonal employees are the quick fix for a busy time and should not be relied upon to act on the company's best interests. These employees will be gone soon, they have nothing to lose. Hiring people with a history of bad behavior is an open invitation for trouble in a place where people let their guard down and seek refuge from the violent city. I only ask that you put in a place a responsible party whose hiring practices are safer for park patrons as well as the local residents of the Yosemite Valley than the current reckless alternative." (Individual, San Jose, CA - #3648)

Response: The hiring practices of concessioners are operational issues beyond the scope of the *Yosemite Valley Plan*. Currently the primary concessioner conducts both pre-employment drug testing and a limited background check; these practices are more extensive than most of the hospitality industry. The National Park Service and the concessioner continue to work together in an effort to help ensure a high quality workforce in Yosemite.

4.16.2 ~ Employee Housing

A wide array of individuals, organizations, and government entities presented concerns regarding the accommodation of employees in Yosemite Valley. To address the breadth of public comments regarding employee housing, concerns in this subsection are separated into four categories: general management direction, housing in Yosemite Valley, housing outside the Valley but inside Yosemite National Park, and housing outside the Park.

4.16.2.a ~ General Management Direction

Many people submitting comments on the employee housing proposals in the *Draft Yosemite Valley Plan/SEIS* address the general direction they believe the Park Service should pursue in dealing with this matter. Several respondents urge the National Park Service to specify in the *Final Yosemite Valley Plan* those park employers who will be allocated housing and how many beds each will receive. In addition to detailed information on employee housing allotments, one nongovernmental organization requests a protocol on how allocation decisions will be made. The Mariposa County Unified School District chastises Yosemite National Park leadership for failing to formulate a master housing plan that addresses the needs of park employees with school-aged children and allows these families to plan where they will reside. Another nongovernmental organization insists that the National Park Service must notify all park employers of housing allocations prior to the *Yosemite Valley Plan's* implementation. Further, this organization states that the Yosemite Association must be allocated sufficient employee housing in Wawona in order to fulfill its purpose.

Other respondents exhort park leadership to seek assistance from organizations outside of the National Park Service when addressing employee housing needs. The Mariposa County Board of Supervisors suggests that the use of private facilities for employee housing will decrease park expenditures as well as ease impacts on communities in Yosemite National Park. More adamantly, a conservation organization declares, "The Park Service should stay out of the housing business unless absolutely necessary." A Yosemite area resident proclaims that park planners lack the experience and objectivity necessary to make housing decisions that will remain viable in the future for Yosemite National Park. This individual urges the National Park Service to consult with independent community planners when designing employee housing developments. Expressing a related concern, one person admonishes the Park Service to improve maintenance procedures before building new structures.



250. Public Concern: The *Yosemite Valley Plan* should clarify which employees will be provided housing in Yosemite National Park.

“And I just ask, there are over 700 employees that will be allowed to maintain their housing in the Park, who are these employees? Who decides who stays and who goes?” (Non-Governmental Organization, Oakland, CA - #20030)

Response: The National Park Service has criteria for the assignment of employee housing in Yosemite Valley. Factors include the roles and responsibilities that housing occupants would have if there were an emergency situation. Because these individuals are generally expected to assist with emergencies, residents are required occupants. It is expected that this housing policy would continue as elements of the *Yosemite Valley Plan* are implemented.

The *Final Yosemite Valley Plan/SEIS* (Vol. IA, Chapter 2, Alternatives) would extend this principle to the concessioner by establishing criteria for the number of employee beds in Yosemite Valley. This would provide consistency when assigning employee housing.

411. Public Concern: The *Yosemite Valley Plan* should include a comprehensive housing plan for Yosemite National Park employees with school-aged children.

“In reviewing the latest draft of the *Yosemite Valley Plan* and the accompanying documents, it is obvious to the Mariposa County Unified School District that there is still no comprehensive housing plan for employees with school-age children. There is still uncertainty as to where employees of the National Park Service and Yosemite Concession Services will live as well as to where the headquarters and many working facilities will be located.” (Mariposa County Unified School District, Mariposa, CA - #4498)

Response: The *Final Yosemite Valley Plan/SEIS* considers the demographic characteristics and needs of employees with school-aged children who could be affected by the relocation of employee housing and presents a range of alternatives to address the school-related needs of park employees. Additionally, the plan evaluates the potential impacts to the Mariposa County Unified School District that would occur related to the relocation of employee housing (see Vol. IB, Chapter 4, Environmental Consequences).

487. Public Concern: The *Yosemite Valley Plan* should provide housing for Yosemite Association employees.

“We believe that the Yosemite Association should be identified as an employer to whom beds are to be assigned, and that it is imperative that housing needs be determined and beds designated for each of the other employers in advance as part of the plan. At Wawona, there is no provision for any beds for the Yosemite Association. If we are to continue to operate effectively and increase our coverage of public facilities, beds need to be designated in Wawona for the association as well.” (Non-Governmental Organization, El Portal, CA - #9476)

Response: This concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan*. Since this housing would not be related to housing relocated from Yosemite Valley, the provision of housing for these employees should be coordinated through a separate process.

749. Public Concern: The *Yosemite Valley Plan* should establish guidelines for private sector involvement in employee housing development.

“The relocations [of housing] as proposed appear to place the burden on the National Park Service and the federal government for establishment of additional housing outside the Valley. We believe that every opportunity should be taken to provide employees with an opportunity to choose private housing outside the Valley and outside the communities of Foresta, El Portal and Wawona and to allow the private sector to respond to the demand, as is conventional in local economies. Private housing would remove the burden of providing costly housing by the Park Service and would additionally help mediate impacts on the Park communities.” (Mariposa County Board of Supervisors, Mariposa, CA - #6060)

“We understand the Park Service’s desire to guarantee affordable employee housing, and we support this effort to push lodging to the perimeter of the Park. We believe, however, that the construction of out-of-valley employee housing should proceed in a staged and deliberate manner, to maximize the opportunity for the private sector to provide housing for employees. The NPS should also develop and employ new housing guidelines to facilitate private sector involvement in housing employees. The bottom line is that the Park Service should stay out of the housing business unless absolutely necessary.” (Conservation Organization, San Francisco, CA - #4594)

Response: The National Park Service is committed to participating in processes that would encourage and develop joint development authorities, joint housing agreements, and joint public-private sector housing programs. The National Park Service does have the administrative authority to consider options for developing partnerships for the purpose of providing employee housing. These options include joint development authorities, joint housing agreements, and joint public-private sector housing programs. These options, however, first require the interest and involvement of local government and private parties who have jurisdictional authority and who can provide park employee housing that is affordable, suitable, and within a reasonable commuting distance. In remote areas like Yosemite National Park, there are generally few options for private individuals to provide cost-effective employee housing, particularly for seasonal employees. For example, current land zoning in Midpines and Fish Camp would not allow for the development of high-density employee housing. The National Park Service recognizes that conditions may change over time. Therefore, the Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* acknowledges that conditions in the local communities may change and private parties may become interested in providing housing for park employees (see Chapter 2, Alternatives—Housing).

636. Public Concern: The National Park Service should consult with independent planners when developing employee housing proposals for Yosemite National Park.

“I recommend that the National Park Service seek the independent expertise of community planners to develop recommendations, including cost estimates, for the creation of employee housing and related community amenities to support the park workforce. I do not believe the planners within the National Park Service possess the depth of experience/expertise, nor the neutral viewpoint, to make operationally or financially sound recommendations that can be carried forward in the future.” (Individual, Yosemite National Park, CA - #7020)

Response: The National Park Service typically contracts planning and design services in accordance with guidelines from the National Academy of Public Administration. For example, the National Park Service has used nine independent consulting firms in preparing the *Final Yosemite Valley Plan/SEIS*.

257. Public Concern: The National Park Service should improve maintenance and upkeep of employee housing.

“The second concern that we have is the maintenance and upkeep of the government-owned cabins. As I understand it, approximately 20 years ago in the Wawona area and perhaps other areas, some of the cabins were purchased by the government and the owners were allowed to live in them. And then just recently after 20-year period, the government took possession of the cabins and put their employees in them. I have had government employees complain to me that they can’t get maintenance and repairs done on their cabins. These are not seasonal employees they’re long-term employees with families, and it’s a concern to me that the government is talking about building additional housing when employees that are now in the government-maintained or government-owned houses are not being maintained.” (Public Hearing, Los Angeles, CA - #20338)

Response: This concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan*. Maintenance and upkeep of housing units are operational issues.

4.16.2.b ~ Employee Housing In Yosemite Valley

The accommodation of employees within Yosemite Valley generates a wide range of opinions from respondents. Among the respondents arguing for removal or reduction of employee housing



in the Valley, one individual asserts that the Park Service has not provided sound reasons why spaces should remain and, therefore, all such accommodations should be removed. Others admonish the Park Service to reduce the number of spaces reserved for employees rather than remove all housing. “683 seems an outrageous number of employees spending the night in the Valley. Why can’t employees take a shuttle in from outside the Valley?” proclaims one person. Some people suggest that the *Yosemite Valley Plan* should limit housing to essential employees only.

Conversely, several respondents declare that living in the Valley is an integral aspect of the Yosemite employee experience and helps draw staff to work in the park. These individuals warn that many concession and National Park Service employees will quit rather than accept relocation. Others highlight the potentially negative impacts on employee lifestyles incurred by moving housing outside the Valley. A Yosemite area resident proffers, “The simple lack of affordable, suitable housing, combined with extended commute times, will provide a significant economic and lifestyle disincentive to workers.”

Numerous individuals and organizations provide other justifications for retaining staff accommodations in Yosemite Valley. Emphasizing increased traffic flow from commuting employees, several people conclude that housing relocation will lead to greater pollution problems and vehicle safety concerns. Several individuals and businesses contend that the proposed transfer of employees out-of-Valley will inhibit a viable level of visitor services. Further, many argue that employees form a vital element of the Yosemite Valley community. “Employees who reside permanently in the Valley form a community that has a vested interest in the Valley and that a mercenary transported work force would not have,” one person advises.

In addition to encouraging the National Park Service to retain employee spaces in the Valley, several people provide suggestions to ameliorate problems with employee housing conditions. Consolidation of existing housing units as well as the use of historic buildings as staff accommodations are two proposals. Alleging the National Park Service has been fiscally negligent, a Yosemite area resident declares that federal emergency recovery funds should be used to rebuild housing units lost during the 1997 flood. A well-concealed employee dormitory at Camp Curry, another person suggests, would have minimal impact on the landscape and attract employees. A Torrance resident asks that the Yosemite National Park Superintendent live in the Superintendent’s residence.

With regard to employee housing near The Ahwahnee and Yosemite Lodge, several individuals and organizations express opinions. “Rather than removing the concession executive housing that faces the Ahwahnee Meadow,” one person asserts, “these houses should be converted to employee housing for concessions employees.” Conversely, a Yosemite area business contends that these row houses “urbanize the meadow,” and retention would be counterproductive to the *Yosemite Valley Plan*’s ecosystem restoration goals. In recognition of their potential historic value, this business suggests the Ahwahnee row houses could be moved to Wawona and used as employee housing. Also concerned with potentially negative impacts to a sensitive area, a few respondents propose building staff dormitories near Yosemite Lodge. Noting the existing level of development at Yosemite Lodge and proximity to guests, a nongovernmental organization concludes that the lodge area is better suited than Curry Village to accommodate two new housing facilities. However, one individual expresses relief that Alternative 2 of the *Draft Yosemite Valley Plan* does not require construction of employee housing near Yosemite Lodge.

Note: One response is provided for concerns #170, #641, and #748, and is placed following concern #748.

170. Public Concern: The *Yosemite Valley Plan* should require the removal of all employee housing in Yosemite Valley.

“All employee housing should be removed from Yosemite Valley. There is no sound reason to retain any employee housing in Yosemite Valley.” (Individual, Madera, CA - #55)

Response: See response following concern #748 below.

641. Public Concern: The *Yosemite Valley Plan* should require a further reduction in the proposed number of employee beds in Yosemite Valley.

“I was shocked at the number of beds dedicated for Park Service and concessionaire housing. I think it is great that this is being reduced, but it does not go far enough. 683 seems an outrageous number of employees spending the night in the Valley. Why can’t employees take a shuttle from outside the Valley? I believe this number should be reduced by half!” (Individual, Fort Bragg, CA - #7304)

Response: See response following concern #748 below.

748. Public Concern: The *Yosemite Valley Plan* should require that housing for non-essential employees be removed from Yosemite Valley.

“Remove some employees and their residences, especially those which are not essential to daily operations of the Park. This includes the Superintendent and all administrative people who perform functions which do not require hands-on presence in the Valley. It should not include the day workers who support the food concessions, the constabulary, and the hotel/campground facilities. Most of these are young people who are willing to work for less than average compensation and should not be required to be bussed to work.” (Individual, San Marcos, CA - #4584)

“I am in favor of removing all non-essential employees from living in the Valley and removing their living quarters at least on a trial basis.” (Individual, San Marcos, CA - #4584)

Response: This alternative has been considered but dismissed (see Vol. IA, Chapter 2, Alternatives Considered but Dismissed).

Moreover, the National Park Service has considered a range of alternatives for employee housing to be removed from or remain in Yosemite Valley (see Chapter 2, Alternatives) or to be relocated to such places as Wawona, Foresta, and El Portal. In each alternative the number of employee beds located in Yosemite Valley would be based on a variety of factors, including the roles and responsibilities that housing occupants would have if there were an emergency. Also, for the concessioner, the number of employees beds in Yosemite Valley would be determined in relation to (1) the area that would be available to accommodate employee housing when considering highly valued resources, (2) Wild and Scenic River protection values, and other natural, cultural, and social impacts, (3) the services that would be available in the Valley, and (4) the service level criteria for staffing those services.

This response also applies to concerns #170 and #178.

201. Public Concern: The *National Park Service* should consider the effects of locating employee housing outside Yosemite Valley on employee recruitment and retention.

“Forget relocating employees unless there is a big financial incentive for employees to relocate. My son is now working in the Valley. His weekly take home pay is only a little over \$120 per week. He has not come to the Valley for the money. He and most of his fellow workers would quit if forced into commuting.” (Individual, Mountain View, CA - #103)



“I do not believe that either the National Park Service, the primary concessionaire or other Park partners will be even marginally successful in recruiting or retaining an adequate workforce at any level (to include managerial) if the bulk of all employee housing is located outside Yosemite Valley. I base this observation on both my professionalism and personal knowledge of the living/working/housing dynamics associated with the Park. The simple lack of affordable, suitable housing, combined with extended commute times will provide a significant economic and lifestyle disincentive to workers of all skills, interests and qualifications to seek and maintain employment in support of the Park.” (Individual, Yosemite National Park, CA - #7020)

“Lack of in-valley housing will seriously impact ability to hire and maintain workers, especially seasonals.” (Individual, Yosemite National Park, CA - #201)

Response: The National Park Service has evaluated the impacts of relocating housing out of Yosemite Valley (see Vol. IB, Chapter 4, Environmental Consequences). The National Park Service conducted a housing study to determine what level of housing is needed to meet essential operations.

42. Public Concern: The *Yosemite Valley Plan* should not eliminate employee housing units from Yosemite Valley.

“We can support Alternative 2, but only if the following changes and clarifications are made to that alternative. We seriously question the Transportation assumption that the number of employee commuter trips will remain the same if 600 plus housing units are removed from the Valley. Even with some use of employee shuttle buses, the amount of employee vehicle traffic into the Valley will necessarily increase from what it is today. That result would be inconsistent with one of the primary goals of the Valley Plan. The N.P.S. should therefore rethink the number of employee housing units being reduced.” (Individual, Santa Barbara, CA - #109)

“I ask you to oppose the funding of moving the park staff out of the park, which would only increase their commute and thereby increase polluting car usage. Moving someone from point A to point B just costs money. It would increase safety and security cost and complicate communications, since it would limit the number of staff in the park at any one time.” (Individual, Jamestown, CA - #226)

“According to the Draft Yosemite Plan, the most dangerous and over-used access to the Park is in El Portal and yet this route will engender bumper to bumper uses. By cutting employee housing in the park by one-half you are condemning the employees to tedious daily journeys and reducing efficiency of their time. Why not use temporary summer housing in tent units to eliminate one source of congestion on the road?” (Individual, Sunnyvale, CA - #23)

“People have always lived in the Valley. I see no need to change that. I think that people who provide necessary services, park employees and many others, should live in the valley as unobtrusively as they can, and I see no problem with the new cottages and present housing.” (Individual, Saratoga, CA - #331)

“There are advantages to retaining a certain level of employee housing in the Valley. These include: Employees who reside permanently in the Valley form a community which has a vested interest in the valley that a mercenary transported work force would not have. There is bound to be a reduction in the level of services available to visitors if the core of the current community is moved out of the Valley. The employees contribute to the culture of the park.” (Individual, Whittier, CA - #196)

“Removing and relocating housing for the sake of reducing beds seems to me to be unwise. Visitors require service employees, and moving employees out of the Valley means increasing transportation requirements, which seems to be a big reason for all this change. Removing housing will also have the impact of making it more difficult to hire and retain highly qualified personnel. Living in Yosemite Valley is an important incentive to many people, and also allows those who have close contact with the visitor to be that much more familiar and knowledgeable about the Valley and the Park. . . Existing in-Valley housing, while not politically correct, is the best all around solution to transportation and visitor service pressures.” (Business, Yosemite National Park, CA - #385)

“It is recommended that employee housing for both the NPS and concessionaire be retained in the Valley and upgraded. . . Employees have the same rights and privileges as any other Yosemite visitor, specifically to enjoy the beauty, grandeur and solitude of the Valley 24 hours a day, not just when they are at work. Most, if not all, who come to Yosemite seeking employment do so with but one thought in mind: to live and work in the Valley, and get

away from the city. These same people could probably find better paying jobs, better housing, and other perks in any big city. . . So coming to seek employment in Yosemite must be for some other reason than pure materialism; simply stated, it is to enjoy being in the Valley on a full time, permanent basis.” (Individual, American Canyon, CA - #907)

CONSOLIDATE EXISTING EMPLOYEE HOUSING UNITS

“Removal of 600+ employee housing units from the Valley seems very shortsighted as we are sure that employee commutes will increase due to the many different shift schedules that must be kept. Consolidation of existing employee housing may be a better solution. It seems it would be much better for the Park (and its air quality) if the employees could walk or ride a bike to work rather than rely on a motor vehicle trip 30 minutes or more each way.” (Individual, Santa Barbara, CA - #202)

RETAIN CASCADE RESIDENCES

“We are opposed to the planned removal of any of the Cascade Residences that retain their historic integrity. We believe they play a key role in illustrating the historic extent of development in Yosemite Valley, and that their removal would not achieve any significant natural resource goals. Given the significant shortage of employee housing in Yosemite, we believe that the Park should preserve historic housing wherever possible.” (Non-Governmental Organization, San Francisco, CA - #7885)

REBUILD EMPLOYEE HOUSING IN YOSEMITE VALLEY

“The employee housing presently located in the Valley should be upgraded, not relocated. Additional employee housing should be rebuilt to accommodate the housing lost after the 1997 flood. This housing should be built without further delay. It has been over three years since the flood, and the government granted over 170 million dollars to the Park for restoration.” (Public Hearing, Mariposa, CA - #20247)

Response: In the *Final Yosemite Valley Plan/SEIS*, the National Park Service has considered a range of alternatives that would allow a number of employees to remain housed in Yosemite Valley. To accommodate those employees who are relocated outside Yosemite Valley, an employee transportation system would be developed. Most employees commuting to work in Yosemite Valley would be required to use the employee transportation system.

In Vol. IB, Chapter 4, Environmental Consequences to Social Environment, the analysis found that there would be an increase in the number of employee commuters traveling to Yosemite Valley. However, even with this increase in daily commuters, it is projected that the number of trips per day would remain relatively constant because there would be a reduction in personal vehicle trips that would offset the increase in the number of employee shuttle trips.

The National Park Service has *not* considered the elimination of all employee beds from the Valley. Instead, the number of employee beds in Yosemite Valley would be consolidated into a few areas to allow for efficient land use and resources restoration and would be based on a number of primary visitor service factors, including the:

1. Type, position, and responsibility of employee
2. Disabilities of the employee that could prevent commuting
3. Areas that would be available to accommodate employee housing when comprehensively considering highly valued resources, Wild and Scenic River values, and other natural, cultural, and social impacts
4. Specific level of visitor services that would be available in the Valley
5. Level of staffing required to provide acceptable levels of service during emergencies



Additionally, based on an analysis of the job location and duty station, current and projected staffing levels, and the feasibility and operational requirements of an employee transportation system, it has been concluded that it is reasonable, feasible, and safe to consider the relocation of employees outside Yosemite Valley. These impacts are assessed in Chapter 4, Environmental Consequences, in the sections describing transportation and social impacts.

Currently, housing conditions in Yosemite Valley need improvement. It is recognized that the quality and type of employee housing (in addition to its location) plays an important role in the success in the hiring and retention of employees. By improving the quality of new housing, it is anticipated that housing outside Yosemite Valley would become more desirable.

Removal of housing from Yosemite Valley has not been proposed for the “sake of removing beds.” In the Preferred Alternative of the *Final Yosemite Valley Plan/SEIS*, the location of housing has been influenced by the following goals and objectives:

- To reduce congestion

- To remove unnecessary facilities

- To retain in the Valley the number of employees required to provide a moderate level of visitor service during emergencies

The location of housing was also influenced by the land available to accommodate employee housing when considering competing land values and uses.

761. Public Concern: The National Park Service should integrate Park and concession employee housing.

“Any new housing should be integrated, without “Government,” “Company,” and “others” all separated, and without discrimination as to employment. As an independent contractor Best’s Studio employs spouses of NPS, Yosemite Concessions Service, and other operators in the Park. But certainly, all new housing needs to be designed with integration in mind to encourage community.” (Business, Yosemite National Park, CA - #10365)

Response: In the *Final Yosemite Valley Plan/SEIS*, the National Park Service has considered a range of alternatives that would allow a number of National Park Service and concessioner employees to remain housed in adjacent housing units and co-located in the same housing areas. In fact, employee beds for all employers would in general need to be consolidated into a few areas to allow for efficient land use and resources restoration.

Even though it is not within the scope of the *Final Yosemite Valley Plan/SEIS* to provide a housing award policy, it is projected that assignment of housing would be based upon a number of primary visitor service factors, including the:

1. Type, position, and responsibility of the employee;
2. Physical and mental capacities of the employee;
3. Roles and responsibilities that housing occupants (employees) would have if there were a situation requiring an emergency response.
4. Area that would be available to accommodate employee housing when comprehensively considering highly values resources, Wild and Scenic river protection values, and other natural, cultural, and social impacts;
5. Specific level of visitor service that would be available in the Valley;
6. Related level of visitor service criteria for staffing those specified levels of service.

Other probable factors that could be considered in housing assignments could be:

1. Job location and duty station,

2. Current and projected staffing levels
3. Feasibility and operational requirements of an employee transportation system

488. Public Concern: The National Park Service should build an employee dormitory at Camp Curry.

“Build a two-story dormitory, hidden among the trees at Camp Curry. Such a structure will provide a smaller footprint/employee - for year-round shelter; which permits retention of trained individuals who are more likely to contribute positively to the visitors’ experience. Such accommodations will have similar advantages to Hostel Style accommodations.” (Individual, Merced, CA - #9329)

Response: The Preferred Alternative of the *Final Yosemite Valley Plan/SEIS* calls for high density housing at the Huff House area of Camp Curry (Vol. IA, Chapter 2, Alternative 2).

314. Public Concern: The National Park Service should require that the Yosemite National Park Superintendent live in the Superintendent’s residence.

“I would like to see a Park Superintendent that would live in that attractively located residence.” (Individual, Torrance, CA - #4227)

Response: The *Final Yosemite Valley Plan/SEIS* does not assign specific individual housing. Under the Preferred Alternative, the Superintendent’s House (Residence 1) is to be relocated to the Yosemite Valley Historic Housing District.

Note: One response is provided for concerns #589 and #394, and is placed following concern #394.

589. Public Concern: The *Yosemite Valley Plan* should retain the Ahwahnee Row houses for concession employee housing.

“Rather than removing the concession executive housing that faces the Ahwahnee Meadow, these houses should be converted to employee housing for concessions employees who will hold jobs in Yosemite Valley. This will enable the concessionaire to inexpensively provide for more concession employee housing, and will have the added benefit of attracting better employees.” (Individual, Coulterville, CA - #3724)

Response: See response following concern #394 below.

394. Public Concern: The *Yosemite Valley Plan* should require the removal of the Ahwahnee Row houses.

“There is no explanation as to why the Ahwahnee Row houses would be retained in Alternative 2, but eliminated in Alternative 3. They urbanize the meadow and as restoration of Ahwahnee Meadow is an important consideration, why not remove them in all alternatives? If historic character is the reason for their retention in Alternative 2, perhaps they could be moved to Wawona for continued use as employee housing or as exhibits at the Pioneer Yosemite History Center? Only a few of the Ahwahnee Row houses truly qualify as historic structures.” (Business, Yosemite National Park, CA - #3962)

Response: The *Final Yosemite Valley Plan/SEIS* proposes a range of alternatives, and actions vary within each of those alternatives. In the Preferred Alternative, the Ahwahnee Row houses would be retained as employee housing and contributing historic structures in the Yosemite Valley cultural landscape. While the National Park Service would consider relocating historic structures as an alternative to complete demolition, relocation often destroys the integrity of historic structures. Their removal would achieve only minor beneficial impacts for vegetation communities because of the small size of the potential restoration area.

This response also applies to concern #589.



750. Public Concern: The *Yosemite Valley Plan* should establish employee housing in the Yosemite Lodge area.

“I believe we should build concession employee housing in the Lodge area as was previously planned. There is too much housing in the Curry Village area. Building nice concession employee housing in the Lodge area would attract excellent employees to work in Yosemite.” (Individual, Coulterville, CA - #3724)

“Some employee housing is obviously necessary in the Valley, and the Park Service has correctly identified a need to replace the without-bath cabins and other scattered lodging facilities with two or three larger structures. The Service has failed, however, to articulate any justification for siting these structures in the middle of highly valued resources in Curry Village. Placing two to three multi-story dormitories in the proposed HVR area appears to us to be unjustifiable from a resource-management perspective, especially given the fact that there are already more than enough impacted and/or less-valued resource areas within the Valley that are potentially available for these structures, including the developed areas of Yosemite Village, Curry Village, and particularly Yosemite Lodge. Yosemite Lodge is the most obvious location since it is located close to guests and Park administration facilities, already impacted, and has large enough open areas to accommodate two large dorms and associated parking. Moreover, the removal of the existing employee trailers and other scattered dwellings will open even more space for redevelopment. Siting employee housing at Yosemite Lodge could be an ideal solution; NPS and YCS will fulfill their housing needs, lodging goals will be met through additional accommodations at Curry Village (see Section VII, SUPRA), and no highly valued resources would be affected.” (Conservation Organization, San Francisco, CA - #4594)

Response: The National Park Service has considered a range of alternatives to house employees at a variety of locations in Yosemite Valley (see *Final Yosemite Valley Plan/SEIS*, Vol. IA, Chapter 2, Alternatives) and at Wawona, Foresta, and El Portal. However, the Preferred Alternative does not call for employee housing adjacent to Yosemite Lodge. Instead, it calls for increasing the number of campsites at Camp 4 (Sunnyside Campground) and for additional open space.

165. Public Concern: The *Yosemite Valley Plan* should eliminate employee housing in the Yosemite Lodge area.

“We thought it important to identify the aspects of Alternative 2 that impress us lest those good aspects be lost in the criticism sure to come. All employee housing in the Yosemite Lodge area is gone. Every Plan issued since the 1980 GMP proposed to put some form of employee housing in the area of the Yosemite Lodge. Even before the 1997 proposal to put up dormitories for 336 employees in this area, facilities existed for 226 employees. In Alternative 2, there will be no dormitories or permanent housing for any employee. None. Needless to say, this decision significantly helps open up the space around Camp 4.” (Individual, Berkeley, CA - #529)

Response: The National Park Service has considered a range of alternatives for employee housing at a variety of locations in Yosemite Valley (see Vol. IA, Chapter 2, Alternatives), at Wawona, Foresta, and El Portal. The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* does not call for employee housing adjacent to Yosemite Lodge. Instead, the Preferred Alternative calls for the area near Yosemite Lodge to be used to increase the number of campsites at Camp 4 (Sunnyside Campground) and for additional open space.

4.16.2.c ~ Employee Housing Outside Yosemite Valley but Inside the Park

Much like the proposed in-Valley housing projects, the *Yosemite Valley Plan* strategies regarding accommodation of employees at other locations in Yosemite National Park generates a wide range of opinions from respondents. One person recommends the Crane Flat area as an alternative with good potential. However, most responses to the *Yosemite Valley Plan*'s proposed facilities at Foresta and Wawona are contradictory. For example, the reconstruction of 14 homes in Foresta for the purpose of housing employees draws contrasting interpretations from the public. A Yosemite area resident claims that reconstruction of the Foresta homes will violate

existing management plans. However, another individual supports the proposed action as long as construction follows strict guidelines.

The impacts precipitated by constructing employee housing units in Wawona are of great concern to a significant portion of the people commenting on the *Yosemite Valley Plan/SEIS*. Some respondents support the proposed action but the majority of public comments regarding the Wawona project offer either tentative acceptance within strict parameters or direct opposition. A few individuals advocate rebuilding an employee dormitory behind the Wawona Hotel. Another requests that any new construction be restricted to the north side of the Merced River. Several people advocate limitations on the type of employees assigned to Wawona facilities. “If a move of concessioner employees to Wawona is unavoidable, move managers and their families to Wawona,” one individual counsels. Similarly, some respondents suggest Wawona housing should be reserved for staff working in the southern portion of Yosemite National Park.

Opposition to the proposed action in Wawona emanates from a wide array of individuals and organizations. Construction of a large employee housing facility in Wawona, some individuals contend, would violate provisions of the Wild and Scenic River Act by impinging upon the community’s Outstandingly Remarkable Values. “The *Yosemite Valley Plan* admits that relocation of employees to Wawona will result in adverse effects to the environmental, cultural, wildlife, and visitor experience values – all Outstandingly Remarkable Values. These adverse effects are precisely the kind that the NPS is obligated to prevent,” a Wawona resident charges.

Many people identify environmental concerns as justification to remove proposed Wawona facilities from the *Yosemite Valley Plan*. Some of these environmental concerns include perceived inadequacies of environmental impact analyses as well as potentially immediate adverse impacts on wildlife and bird habitat. Further, numerous respondents opposing the Wawona proposal underscore possible adverse impacts on the cultural integrity and infrastructure of the community. Social and cultural concerns that respondents cite are the quality of life for area residents, including employees; visitor experience; public safety, with particular attention to Camp Wawona participants; and construction costs. Water supply, sewer treatment, and transportation are the primary infrastructure concerns expressed by respondents.

588. Public Concern: The *Yosemite Valley Plan* should establish employee housing in the Crane Flat area.

“Let’s locate them [employees] near Crane Flat, let’s consider that. What’s to be lost? . . . That area could be developed as a resource.” (Public Hearing, Los Angeles, CA - #20343)

Response: Crane Flat was considered and rejected as an alternative for employee housing. It was also dismissed as an alternative in the *Draft Yosemite Valley Housing Plan*. Although the *Draft Yosemite Valley Housing Plan* dismissed Crane Flat as an alternative for employee housing, the planning team evaluated the site for this planning effort. It was determined that Crane Flat was not needed to support housing needs for the following reasons:

There is no community in the area, so placing a new community in the area would change its characteristics and impacts would be unacceptable.

Housing needs could be accommodated in other locations where communities already exist and have support facilities to serve the needs of the employees (e.g., Wawona , El Portal).



646. Public Concern: The *Yosemite Valley Plan* should not allow NPS-owned homes in Foresta to be rebuilt.

“Most alternatives specify rebuilding 14 homes in Foresta that were destroyed by the A-Rock fire ten years ago this August. Doing this would be in violation of the Mission 66 Plan which mandated that homes, sold to the government through a willing seller/willing buyer purchase agreement, upon destruction by fire, would be returned to a natural state. The rebuilding of these homes further violates the 1980 General Management Plan which specifically states there would be no further ‘development’ in Foresta.” (Individual, Yosemite National Park, CA - #7030)

Response: The 1980 *General Management Plan* prescription for housing in Foresta is to: “Provide essential employee housing based upon the determination of a housing study, retain housing for a limited number of employees.” Housing in Foresta is intended to serve those employees who are essential to providing effective district operations.

52. Public Concern: The National Park Service should ensure that employee housing in Foresta meets specific construction and design criteria.

“We are in support of the 14 units of employee housing being located in Foresta, provided that: (1) The housing is on the east side of Crane Creek. (2) The housing is aesthetically compatible with the area and the other ‘cabin’ housing in Foresta. The housing should have wood construction and siding, colored metal roofs, and not be like a suburban tract house. (3) The housing have septic tanks, underground utilities, and a water supply. (4) We prefer the housing be limited to rangers and N.P.S. employees, rather than concessionaire employees, who tend to be more transient.” (Individual, Santa Barbara, CA - #109)

Response: This concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan*. Nonetheless, before undertaking development of new employee housing units, the National Park Service will identify and evaluate alternatives for housing opportunities outside of Yosemite National Park. The identification and evaluation of housing alternatives would be collaborative, with participation by appropriate county officials and representatives of affected communities. Decisions regarding the location of new employee housing will be in accordance with the Omnibus Parks and Public Lands Act of 1996 and applicable National Park Service policies. It is the intent of the National Park Service to locate additional housing outside the park where possible.

186. Public Concern: The *Yosemite Valley Plan* should establish employee housing in Wawona.

“Things I especially like: The location of employee housing in Wawona is all right.” (Individual, Pacific Grove, CA - #156)

Response: In the *Final Yosemite Valley Plan/SEIS*, the National Park Service considers a range of alternatives that include locating employee housing in Wawona (see Vol. IA, Chapter 2, Alternatives). Locating housing in Wawona is consistent with provisions of both the 1980 *General Management Plan* and the 1987 *Wawona Planning Area Specific Plan*. The *Wawona Specific Plan* was jointly approved by both the National Park Service and Mariposa County Board of Supervisors. The housing considered in the *Final Yosemite Valley Plan/SEIS* would be on federal land administered by the National Park Service and would not be subject to county zoning ordinances. However, the *Merced River Plan* Record of Decision states:

“Before undertaking development of new employee housing units in Section 35, the National Park Service will identify and evaluate alternatives for housing opportunities outside of Yosemite National Park. The identification and evaluation of housing alternatives would be collaborative, with participation by appropriate county officials and representatives of affected communities. Decisions regarding the location of new employee housing will be in accordance with the Omnibus Parks and Public Lands Act of

1996 and applicable National Park Service policies. With regards to Wawona, it is the intent of the National Park Service to locate additional housing outside the park where possible.”

The analysis and investigation documenting the environmental consequences of relocating housing to Wawona are in Vol. IB, Chapter 4. The analysis covers a variety of impact topics, including water resources and supply, the social environment (i.e., school, fire, law enforcement, emergency, and recreational requirements), transportation and roads, noise, soil, vegetation, wildlife, and the Wild and Scenic Merced River classification, zoning, and Outstandingly Remarkable Values.

330. Public Concern: The National Park Service should rebuild a dormitory behind the Wawona Hotel.

“Build a dorm behind the Wawona hotel like we used to have before it burned.” (Individual, Loomis, CA - #3387)

“For the single employees needed to staff the Wawona Hotel, rebuild the dorm behind the hotel, an approach that the hotel manager favors.” (Individual, Rancho Palos Verdes, CA - #3563)

Response: One of the components of the *Final Yosemite Valley Plan/SEIS* is to provide housing for those employees who are to be relocated out of Yosemite Valley. To address this, the *Final Yosemite Valley Plan/SEIS* calls for the placement of employee housing in Wawona. Additionally, the plan acknowledges that there is an inadequate supply of housing for employees who are currently stationed in Wawona. The total number of employee beds to be placed in Wawona recognizes this inadequacy, and calls for additional beds for employees stationed in Wawona, along with the new beds intended to serve employees stationed in Yosemite Valley. This action would not preclude consideration of rebuilding the dorm that was once located behind the Wawona Hotel.

328. Public Concern: The *Yosemite Valley Plan* should require that dorms in Wawona be constructed on the north side of the river.

“If we must build dorms, build them on the other side of the river [in Wawona] where the Park has plenty of land and where the Park already has several facilities.” (Individual, Loomis, CA - #3387)

Response: The *Merced River Plan/FEIS* Record of Decision makes this commitment:

“The management zoning adopted in this alternative only applies to federal lands. With regard to Section 35 in Wawona (though zoned primarily as 3C, Park Operations and Administration), it is the intent of the National Park Service that any other development for administration or operations in Section 35 north of the South Fork of the Merced River would be compatible in character, density, and scale to existing residential and commercial development in Section 35.

“For the area zoned jointly 3A/3C on the south side of the South Fork of the Merced River in Section 35, should the National Park Service determine that new, high-density housing is not required to be located in this zone, it is the intent of the National Park Service that any development for administration or operations in this zone would be compatible in character, density, and scale to existing residential and commercial development in Section 35. The potential use of this zone (as described under management zone 3A) would not change.”

597. Public Concern: The *Yosemite Valley Plan* should restrict the types of concessions employees who live in Wawona.

“If a move of concessionaire employees to Wawona is unavoidable, move managers and their families to Wawona.” (Individual, Rancho Palos Verdes, CA - #3563)



ESTABLISH ONLY SINGLE FAMILY HOUSING IN WAWONA

“Relocate only single family residential Park employees to Wawona. Wawona is a residential community, not a community of single young adults. Consider the human impact as well as the environmental impact.” (Individual, Loomis, CA - #3387)

Response: This concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan*. Both the National Park Service and the concessioner currently have housing occupancy criteria. It is expected that these criteria would continue to influence housing assignments.

175. Public Concern: The *Yosemite Valley Plan* should establish housing in Wawona only for those employees who work in the southern portion of Yosemite National Park.

“NPS employee housing in Wawona should be limited to the employees which serve the southern portion of the park. More emphasis should be given to house Valley employees outside of the park boundaries. Let’s do all we can to preserve and maintain all of Yosemite National Park for its visitors and not overcrowd desirable destinations inside the park but outside the Valley with housing facilities.” (Individual, Eugene, OR - #326)

Response: The *Yosemite Valley Plan* does call for a number of employee bed spaces in Wawona to meet the housing needs of employees stationed in Wawona. However, the plan also calls for implementing provisions of the 1980 *General Management Plan* and the 1987 *Wawona Town Planning Area Specific Plan*, which both specify that employee housing units should be located in Wawona.

The National Park Service does have the administrative authority to consider options for developing partnerships for the purpose of providing employee housing. These options include joint development authorities, joint housing agreements, and joint public-private sector housing programs. These options, however, first require the interest and involvement of local government and private parties who have jurisdictional authority and who can provide park employee housing that is affordable, suitable, and within a reasonable commuting distance. In remote areas like Yosemite National Park, there are generally few options for private individuals to provide cost-effective employee housing, particularly for seasonal employees. For example, current land zoning in Midpines and Fish Camp would not allow for the development of high-density employee housing. The National Park Service recognizes that conditions may change over time. Therefore, the Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* acknowledges that conditions in local communities may change and private parties may become interested in providing housing for park employees (see Vol. IA, Chapter 2, Alternatives—Housing). The National Park Service is committed to participating in processes that would encourage and could develop joint development authorities, joint housing agreements, and joint public-private sector housing programs.

200. Public Concern: The *Yosemite Valley Plan* should not establish employee housing in Wawona.

“The YVP admits that relocation of employees to Wawona will result in adverse effects to the environmental, cultural, wildlife, and visitor experience – all ORVs. These adverse effects are precisely the kind that the NPS is obligated to prevent. They matter most on the scale of values identified in the YVP and WSRA. The Wawona site should be eliminated as an option for employee housing.” (Individual, Fresno, CA - #736)

“Unfortunately this plan tries to solve problems in the Valley by sacrificing Wawona. In Wawona the Plan does not reclaim priceless natural beauty; instead it erects a 200 resident Yosemite Concession Services (YCS) barracks on 8 acres of pristine forest land. Nor does the Plan let natural processes prevail; instead the new facility will include a 200+ parking lot, a health care center, recreation facilities, and a hair care shop. And it does not promote visitor understanding and enjoyment; rather it will convert the present one-lane access road past the Pioneer History Center to a commuter highway. It does not reduce traffic congestion; South Wawona will experience a twice a day, 7 days per week, 365 days per year rush hour. And it does not reduce crowding in Wawona, where the permanent population will be more than doubled.” (Individual, Wawona, CA - #20197)

ADVERSE EFFECTS ON THE ENVIRONMENT

“The volumes of documentation and comments presented are filled with assumptions, inaccuracies, and at times outright false statements. Nowhere is this more true than the current administration’s decision to relocate hundreds of Park concession employees to a new facility to be constructed in the Wawona area. Any plan which needlessly and pointlessly destroys many acres of pristine and virgin forests, including a number of majestic 500-year old Redwoods, is suspect, questionable, and in my opinion untenable. In place of this mile-long sylvan glen along Forest Drive, the Park Service will spend millions to pave it over, construct multi-unit housing, and build a number of additional structures as support facilities for concession employees. It is claimed such a desecration is a small and mandatory price to be paid to accomplish the objectives of the Valley Plan. Please don’t destroy Wawona.” (Public Hearing, San Jose, CA - #20524)

INADEQUATE ENVIRONMENTAL IMPACT ANALYSIS

“No additional employees should be moved to Wawona. Resource stewardship: the evidence of adequate investigation and documentation of environmental impact assessments that are required to justify the selection of the site is incomplete or lacking. Important factors include water resources, fire and emergency requirements, localized environmental impact from building construction, housing structures, habitation, recreation, parking, transportation, as these relate to soil, trees, fauna, as well as run off into the Merced River and river overlay area. There are serious questions related to each of these factors. References in the YVP document to research information that would demonstrate the acceptability of the housing proposal are either very vague or do not appear as part of the record.” (Individual, Fresno, CA - #736)

ADVERSE EFFECTS ON WILDLIFE HABITAT

“If housing for the 200 concessionaire employees is built on this road, the added traffic will destroy the pristine forest along this road. Wildlife habitats will be lost when trees and ground cover are removed to develop the housing. There will be high impact on the river used by employees who have no vested interest in the area. Beautiful, winding Forest Drive, which leads to the housing, would have to be widened, redesigned and patrolled constantly. To alleviate this problem, we strongly recommend selecting a better location.” (Individual, Carson City, NV - #3203)

ADVERSE EFFECTS ON BIRDS

“Recently I have had the opportunity to review the Biological Assessment Draft for the YVP. I was particularly surprised by what I feel is an inadequate evaluation of the dramatic effects that the YVP could have upon avian species in Wawona. Surely you are aware of the population studies done by Point Reyes that indicate that Wawona Meadow is among those few meadows identified in the Sierra with such a variety of avian species. To propose the building and housing of 198 employees and all that come with them in Wawona shows serious disregard for the wildlife the NPS is obligated to protect.” (Individual, Wrightwood, CA - #4239)

ADVERSE EFFECTS ON THE COMMUNITY

“Wawona has a year-round population of maybe 50 to 75 individuals composed of many retired people, families and some Park personnel. The plan proposes to relocate about 300 Park employees into apartments to be built for single employees on the south side of the Merced River. This proposed 350 to 500 percent increase in the year-round population would negatively affect this community. A recent poll found over 90 percent of the homeowners were opposed to the plan to relocate additional employees to Wawona. We do not want the extra infrastructure that would be necessary to house the additional personnel. The lifestyle of the community is not capable of assembling this type of influx of individuals.” (Public Hearing, Fresno, CA - #20490)

ADVERSE VISITOR EXPERIENCE AND QUALITY OF LIFE IMPACTS

“No additional employees should be moved to Wawona. Visitors, primarily families, in Wawona during the summer make use of a limited number of areas along the river for leisure and recreation. Increasing the employee population will increase competition for such river usage. Increased competition will result in conflicts for space as well as conflicts in the sorts of ‘acceptable activities’ that can be expected from young adults utilizing their leisure time in



the Wawona area. This will in turn have an adverse effect upon visitor experience in Wawona generally. Wawona functions as a high quality scenic and recreational experience for visitors. Not only will day use visitors be affected, it is reasonable to expect that the services and accommodations available in Wawona that are of value to YNP will be adversely affected as well. According to the Valley Plan, the number of employees will be more than the number of permanent residents in Wawona. This involves a serious disregard for the quality of services, accommodations, and visitor experiences that have long been the primary attractions of Wawona. There is a serious incompatibility between the historical, social, and environmental quality of life in Wawona and the styles of life characteristic of temporary employees. YNP has an obligation to sustain and enhance this quality of life inherent in Wawona rather than threaten it for what amounts to be questionable utilitarian purposes.” (Individual, Fresno, CA - #736)

“It is disturbing to read one plan on page 4.1-15 of Vol. 1B that a proposed development for employee housing is being considered on the last remaining stretch along the South Fork through Wawona. This has been a nice peaceful and quiet area. Senior citizens have enjoyed the tranquility there for many years and this would certainly turn the area into a slum with hundreds of extra cars and people trampling through the forest to reach the shore and other facilities . . . Please rethink your plan and let’s keep one area like Wawona as natural as it is at the present time.” (Individual, Long Beach, CA - #482)

ADVERSE IMPACTS TO COMMUNITY SAFETY

“No additional employees should be moved to Wawona. Based upon the evidence, it is reasonable to expect an increase in criminal activity and deviate behavior of various sorts to occur in Wawona. The annual safety records of YNP reveal a significant level of problems caused or violations committed by employees. The Plan states that these problems/violations can be expected to be transferred to Wawona. The resulting social environment will contrast markedly with the past history of a relatively low level of such occurrences in the Wawona community. The NPS should be committed to protecting Wawona from this.” (Individual, Fresno, CA - #736)

“I am writing to express my disapproval of the changes the NPS has proposed, or implemented, for Yosemite Valley, such as the plan to move 198 Yosemite Concessionaire/NPS employees to Wawona. . . Fire safety would be a problem given the narrow, dead end road leading to the proposed location.” (Individual, Dos Palos, CA - #1224)

ADVERSE EFFECTS ON CAMP WAWONA PARTICIPANTS

“The proposed employee housing site in Wawona is immediately adjacent to Camp Wawona, which has been operated for decades by the Seventh Day Adventist Church. Camp Wawona is home to hundreds of children (including minorities and handicapped) in the summer. Are the NPS and YCS prepared to guarantee the safety of these children from drug dealers and sexual predators by screening all residents at the proposed site? . . . A single incident perpetrated by a resident or visitor at the proposed housing site will cost the government (and we taxpayers) millions of dollars. It would make a lurid story for 60 minutes, 20-20, or some other TV news magazine and would be a publicity nightmare for everyone from local Park supervisors to senior policy administrators at the NPS and Department of Interior. Yosemite Valley planners would be accused of incredible negligence and stupidity for citing YCS housing next to a church summer camp. Is this an idle fear? No. Long time visitors and residents in Yosemite (names available if required) have witnessed public nudity and masturbation in the presence of children along the river. Arrest records will verify that YCS employees have committed numerous drug and sex offenses in the past. It is inevitable that a degenerate resident or visitor at the proposed site will exploit a gullible and/or disabled minor at Camp Wawona. Posting signs, as suggested in the Draft Plan, is not a credible deterrent. An alternate, less risky site should be selected for YCS employee housing.” (Individual, Palos Verdes Estates, CA - #354)

“The purpose of this letter is to express my disagreement with the proposed plan to house 200 concessionaire employees on the south side of Wawona. . . The proposed plan situates the employee living arrangements near the Seventh Day Adventist Camp. Over decades I have observed the Camp in operation and participated to a certain extent. Not only does it serve the average child but also gives both minorities and disabled children the opportunity to experience nature in a safe environment. I believe that the plan will endanger all of the children the Camp serves.” (Individual, Wawona, CA - #474)

ADVERSE EFFECTS ON PARK EMPLOYEES

"I am here today to raise my voice in protest over the plan to move concessionaire employees out of the Valley and into the very small communities of El Portal and Wawona. Have we forgotten that these employees truly are part of that Yosemite experience? It is their hard and dedicated service that makes this an enjoyable experience with less hassle for many visitors each day. Most of these employees don't make a lot of money and many don't own a car. Their main modes of transportation are by foot or by bike, and that would be impossible from El Portal. So transportation costs go up. And right now they pay a much smaller rent in company provided housing then they will if forced to move to a site outside of the Park. Housing costs go up. So effectively this plan, on top of all the other injustices and hardships for visitors, also drastically cuts the real spendable income of nearly a thousand hardworking Americans." (Public Hearing, Fresno, CA - #20491)

EXORBITANT HOUSING CONSTRUCTION COSTS

"We need to examine some of the costs using your figures: From Volume 1a, Chapter 2, Table A, Alternative 2 proposes to construct a total of 898 employee beds of which 198 are allocated to Wawona. From Appendix M - Phasing, you have a figure of \$145,907,000 for employee housing park wide. The arithmetic yields a minimum cost per bed (initial capital outlay only) of \$162,500 per employee. Now for a slightly more realistic cost analysis specific to Wawona, since the proposed site is on completely undeveloped forest land and on a hillside, it would not be unreasonable to assume that approximately a third to one-half of your housing budget is used to develop the proposed site in Wawona. . . The arithmetic then shows a cost per bed ranging from \$245,600 to \$368,500. These figures apparently do not include the proposed housing support facilities (laundry, recreational facilities, wellness center, hair care, and office spaces) because ('The size and exact location of the support facilities . . . are beyond the scope of this report.' - from volume 1A 2-55). Keep in mind that these figures are only one time development costs; there would be ongoing costs of transportation, maintenance, support facilities, law enforcement, and other costs resulting from this development only. These costs are astonishing, more than likely are underestimated, and they come directly from the National Park Service Draft Yosemite Valley Plan. You ask of us to 'consider the public good' in examining your plan. Volume 1A, Table 2-26 shows 'Restoration (natural and cultural resources)' receiving less than 5% of the one-time development budget for the park under Alternative 2, and 'Employee Housing' receiving 43%, or 145.9 million dollars. Looking at these figures I have to ask, are you considering the public good?" (Individual, Wawona, CA - #357)

"As owners of a home in the historic town of Wawona, we are opposed to . . . the proposed housing area for 198 employees . . . The grounds for our opposition include the following: . . . The required public funding for these elements will be substantial and should be spent elsewhere on more significant matters." (Individual, Los Angeles, CA - #3175)

ADVERSE IMPACTS TO WATER AND SEWER FACILITIES

"I am writing to express my disapproval of the changes the NPS has proposed, or implemented, for Yosemite Valley, such as the plan to move 198 Yosemite Concessionaire/NPS employees to Wawona. . . Wawona's water and sewer facilities would surely be strained with the addition of 200 or more people and it might be too costly to remedy the situation." (Individual, Dos Palos, CA - #1224)

"[Wawona] Sewage treatment is another key issue with the additional 198 people. What sewage treatment system is going to handle the additional load? And who pays for the processing? As the recipient of the overflow raw sewage on my property just below the Wawona School when the lift pumps fail, I am not in favor of adding more users to the system." (Individual, Fairfax Station, VA - #4768)

"The Draft Yosemite Valley Plan intends to locate employee housing in the small historic town of Wawona. However this is in conflict with the data prepared by the U.S. Geological Survey Report prepared specifically for the National Park Service. As with other critical issues, the Planning Office chooses to ignore its own data. The Draft Plan states: 'The water supply system in Wawona is marginal as is the capacity of the Wawona Wastewater Treatment Plant' [Volume 1A, 3-124]. Furthermore: 'The NPS is considering other options to increase the reliability of the water system at Wawona including bringing water into Wawona via a seven mile pipeline from beyond the Mariposa Grove and/or drilling deep wells.' [Volume 1A, 3-125] The 'seven mile pipeline' refers to Biledo Spring, which is located outside the southern boundary of the national Park, in Sierra National Forest. However, according to the NPS-commissioned USGS report [Ground-Water Resources and Water Supply Alternatives in the Wawona



Area of Yosemite National Park, California, Report No. 95-4229, 1996] ‘Continuous monitoring of the flow of Biledo Spring and sampling for chemical and isotopic analysis would be needed for several years before the long-term variability in flow and quality could be assessed.’ [Page 54] This monitoring of Biledo Spring has never been done, and the USGS report states very clearly that such monitoring must be done before the spring can even be considered as a reliable source of water for Wawona. Furthermore, several public and private entities (including the Madera Irrigation District) have appropriated rights superseding NPS to water in Big Creek . . . into which Biledo Spring supplies water. Drilling deep wells is not a solution either. According to the USGS report: ‘Additional development of ground water in the South Fork Merced River valley could result in the degradation in the quality of ground water in deep fractures and allow saline water to flow up well bores and mix with the shallow fresh water. The use of deep wells during the summer and autumn dry seasons could exacerbate the water quality problem.’” (Non-Governmental Organization, Wawona, CA - #7882)

ADVERSE TRANSPORTATION IMPACTS

“No additional employees should be moved to Wawona. Local transportation management and parking will be a major problem. The site is located about 1/8 mile from the end of an approximately 1 1/2 mile paved one-lane road. Employees will have to be shuttled back and forth by some means from the housing site to the transportation transfer point to the valley. This will result in a massive impact on the south side of the river. Traffic is already increased during the summer of the SDA Camp programs, day use of Upper River area by visitors, as well as high visitor usage along Highway 41 from the hotel and golf course to the stables. The transportation of employees on a daily basis to and from Yosemite Valley on Highway 41 will be significant for employees as well as all other traffic to and from the Valley. The logistics related to time schedules and other requirements for employment will be difficult and costly. The actual time required to travel from Wawona to the Valley is over 50 minutes each way ‘under ideal weather conditions and when there is little traffic.’ How many employee hours will the daily, weekly, monthly travel require? At what cost? With what kind of transportation, increased accidents, noise, and air pollution? These factors must be compared with sites that are closer and more easily accessible to Yosemite Valley.” (Individual, Fresno, CA - #736)

“I am writing to express my disapproval of the changes the NPS has proposed, or implemented, for Yosemite Valley, such as the plan to move 198 Yosemite Concessionaire/NPS employees to Wawona. . . The traffic of buses and the cars of the NPS and concessionaire employees on the narrow and twisting roads would impact the community with noise and disturbance. In addition, the daily bussing of employees between the Valley and Wawona would be time-consuming and hazardous, especially in wintertime conditions.” (Individual, Dos Palos, CA - #1224)

“The transportation of the employees twice daily between Yosemite Valley to housing at Wawona will only add to the vehicle pollution that all the plans are trying to eliminate. Also, many days during the winter the road from Wawona to Yosemite Valley is closed due to icy conditions. . . The planned site for the housing facility at Wawona on Forest Drive would cause added use of this narrow, low speed road that it could not accommodate and should not be widened in any fashion.” (Individual, Cupertino, CA - #133)

Response: In the *Final Yosemite Valley Plan/SEIS*, the National Park Service considers a range of alternatives that include locating employee housing in Wawona (see Vol. IA, Chapter 2, Alternatives). Locating housing in Wawona is consistent with provisions of both the 1980 *General Management Plan* and the 1987 *Wawona Planning Area Specific Plan*. The *Wawona Specific Plan* was jointly approved by the National Park Service and the Mariposa County Board of Supervisors. The housing considered in the *Final Yosemite Valley Plan/SEIS* would be on federal land administered by the National Park Service and would not be subject to county zoning ordinances.

However, the *Merced River Plan* Record of Decision states:

“Before undertaking development of new employee housing units in Section 35, the National Park Service will identify and evaluate alternatives for housing opportunities outside of Yosemite National Park. The identification and evaluation of housing alternatives would be collaborative, with participation by appropriate county officials and representatives of affected communities. Decisions regarding the location of new employee housing will be in accordance with the Omnibus Parks and Public Lands Act of 1996 and applicable National

Park Service policies. With regards to Wawona, it is the intent of the National Park Service to locate additional housing outside the park where possible.”

The analysis and investigation of the environmental consequences of relocating housing to Wawona are in Vol. IB, Chapter 4. The analysis covers a variety of impact topics, including water resources and supply, the social environment (i.e., school, fire, law enforcement, emergency, and recreational requirements), transportation and roads, noise, soil, vegetation, wildlife, and the Wild and Scenic Merced River classification, zoning, and Outstandingly Remarkable Values.

4.16.2.d ~ Employee Housing Outside Yosemite National Park

Scores of people responding to the *Yosemite Valley Plan/SEIS* expressed concerns regarding the relocation of staff accommodations outside of the Valley and outside Yosemite National Park. Citing the National Park Service’s standing commitment to redirect development away from the park’s core, some individuals identify out-of-park communities they believe are appropriate for employee housing facilities. The list of communities includes Yosemite West, Oakhurst, Midpines, Mariposa, and Fish Camp. In addition, several respondents espousing relocation accuse the National Park Service of failure to document that sites outside the park were sufficiently evaluated for housing suitability. “If the National Park Service cannot establish that it has fulfilled this stipulation, that will be a basis for a legal challenge to the implementation of its preferred alternative,” warns one individual.

Potentially negative impacts on the community of El Portal from an increase in housing and population elicits responses from a variety of sources. Public safety is a particular concern for many respondents. One El Portal resident offers a list of emergency medical care scenarios as support for reconsideration of the project. One person notes that the proposed Hennessey Ranch (also known as the El Portal Trailer Court) facilities are in the Merced River floodplain. This person believes the planned floodwall will not adequately protect new facilities from catastrophic flooding and questions whether the National Park Service has accurately calculated mitigation costs. Another individual who opposes the proposed action points out that the development will displace existing low-cost family housing.

Another reason people cite when opposing the proposed El Portal housing project is the potential danger for park employees. According to an American Canyon resident, the Park Service should not require employees to traverse Highway 140 on a daily basis. To do so would be negligent because the road is often treacherous in winter, this individual asserts. A representative of the U.S. Forest Service challenges the “minor, long term, and beneficial” assessment of the El Portal project cited on page 4-50 of the Executive Summary. Emphasizing possible effects on the recreational ORVs of the Merced River corridor, this Forest Service employee proclaims, “Failure to adequately mitigate the natural resource and social aspects of this dramatic increase in population will significantly reduce the quality of the recreational experience for the visiting public, employees, and reassignments located at El Portal...” Regardless of potential impacts from the El Portal development, a conservation organization encourages the Park Service to build a community center for the benefit of park staff and local citizens.



Note: One response is provided for concerns #280 and #155, and is placed following concern #155.

280. Public Concern: The National Park Service should consider employee housing sites outside of Yosemite National Park.

“The NPS should explore other potentially appropriate employee housing sites such as Yosemite West, Oakhurst, Midpines and Mariposa, all of which lie outside the Park boundaries and which would seem to accomplish the NPS’s stated intent ‘to redirect development to the periphery of the Park and beyond.’” (Individual, Wawona, CA - #3799)

FISH CAMP

“Please consider relocating employee housing to areas outside of the National Park. Fish Camp, for example, is by the South Entrance and is on the way to Oakhurst, where employees will travel anyway for goods and services.” (Individual, No Address - #1840)

YOSEMITE WEST

“I believe that you have overlooked the value of the areas known as Yosemite West in the Draft of the Valley Implementation Plan, and, I would like once again to offer the values of this strategically located, privately owned, and undeveloped 752 acres of land for your consideration before your final acceptance of the Yosemite Valley Plan. We have the potential to provide a site for relocation of NPS and concessionaire employee housing.” (Individual, San Jose, CA - #5604)

Response: See response following concern #155 below.

155. Public Concern: The *Yosemite Valley Plan* should provide sufficient evidence that no suitable employee housing sites are available outside of Yosemite National Park.

“The NPS is required to demonstrate that no suitable options for employee housing are available other than Wawona. Specifically, the NPS must show that sites for accommodations are not available in the local communities or areas outside the Park. Since Alternative #2 is preferred by the NPS, one assumes that there was a good faith effort to find available sites. Where does the evidence of this effort appear in the plan? Evidence to the contrary appears to be present in Mariposa County and the Midpines area. The 1980 General Management Plan for the Valley included this ‘outside the Park’ provision. If the NPS cannot establish that it has fulfilled this stipulation, that will be a basis for a legal challenge to the implementation of its preferred alternative.” (Individual, Fresno, CA - #736)

“The Park has said that they would not build in Wawona unless there was nothing outside the Park. And yet your studies have not demonstrated any valid documented evidence that other places, Mariposa, Chinquapin, and other places . . . outside of the Park aren’t available.” (Public Hearing, Los Angeles, CA - #20362)

Response: The National Park Service is committed to participating in processes that would encourage and potentially develop joint development authorities, joint housing agreements, and joint public-private sector housing programs. The National Park Service does have the administrative authority to consider options for developing partnerships for the purpose of providing employee housing. These options include joint development authorities, joint housing agreements, and joint public-private sector housing programs. These options, however, first require the interest and involvement of local government and private parties who have jurisdictional authority and who can provide park employee housing that is affordable, suitable, and within a reasonable commuting distance. In remote areas like Yosemite National Park, there are generally few options for private individuals to provide cost-effective employee housing, particularly for seasonal employees. For example, current land zoning in Midpines and Fish Camp would not allow for the development of high-density employee housing units. Regardless of these current obstacles, the National Park Service recognizes that conditions may change over time. Therefore, the Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* acknowledges that conditions in the local

communities may change and private parties may become interested in providing housing options for park employees (see Vol. IA, Chapter 2, Alternatives, Housing).

This response also applies to concern #280.

177. Public Concern: The National Park Service should examine the effects of locating employee housing in El Portal on the community and its infrastructure.

“And while it seems logical to relocate some employee housing to El Portal, it seems that the amount of additional residents to be relocated to El Portal needs to be examined very carefully by the Park, the public, and current residents. How would this influx of employees change the current community and its infrastructure? For example: What about medical care? Right now, El Portal residents are faced with a 30+ minute drive to Yosemite Valley for minimal medical care at an unsatisfactory urgent care clinic, or they must drive 45+ minutes to a slightly more well equipped clinic (also not a hospital) in Mariposa. What about police/ranger protection, especially for nighttime emergencies and disturbances? It is my understanding that currently none of the El Portal NPS rangers are on duty at night. How will these important components to a safe community improve when the population increases in El Portal? And how much would the population actually increase? Would young seasonal employees be willing to live in an isolated town so far removed from Yosemite National Park?” (Individual, El Portal, CA - #456)

Response: The National Park Service has prepared a social environment impact analysis for all of the communities, including El Portal (see Vol. IB, Chapter 4, Environmental Consequences).

366. Public Concern: The National Park Service should assess the cost of locating housing in Hennessey’s Ranch.

“A lot of housing has been proposed for Hennessey Ranch. That is a floodplain. And the mitigation is to put a floodwall there. I am not sure that you have thought of how much that’s going to cost because the bridge is going to have to be raised and the road is going to have to be raised, otherwise the water will flow through there. If the river shifts, as it did in ‘97, and hits the wall head-on, I don’t think the wall will stand up to that sort of force. We could build it because we built Hoover Dam, but I don’t know if the Park wants to pay for it.” (Public Hearing, Fresno, CA - #20489)

Response: Cost estimates for building housing at the Hennessey’s Ranch site are provided in the *Final Yosemite Valley Plan/SEIS*. During the design phase, the National Park Service would take all flood mitigations into consideration. Cost estimates for building housing, as well as other cost estimates, are provided in Vol. II, Appendix M, Sequencing.

276. Public Concern: The National Park Service should reconsider closing the El Portal Trailer Court.

“I want to address the El Portal Trailer Court. We’re very concerned about closing that down, as well. As you know, the concession employees are not allowed to have families in company housing. If you decide to have a family, you have to relocate someplace else, and the El Portal Trailer Park is the only close, affordable family housing that exists right now. And if you eliminate that and turn that into high-density housing, there’s going to be no place for the working families to afford to live. So we ask that you really consider that and create some other options. We think that the trailer court is a viable place to raise children. It’s a safe community. It’s pretty enclosed there, and there’s flat roads for children to be able to ride their bikes, and we think that that should continue.” (Public Hearing, Mariposa, CA - #20258)

Response: This concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan*. The trailer court in El Portal is in the process of being closed as stipulated by the 1980 *General Management Plan*. As a result of this action, owners of trailers located in the trailer village are eligible to apply to the National Park Service for relocation benefits pursuant to the Uniform Relocation Act of 1970.



164. Public Concern: The *Yosemite Valley Plan* should not establish employee housing in El Portal.

“Forcing employees to live in El Portal and drive, or be driven, to work over a long, two way icy, snowy road, where accidents will occur, is unconscionable. To purposefully place these people daily in ‘harms way’ is near criminal, certainly stupid. In addition, as El Portal is certainly not the ‘garden spot of the Sierras,’ what family in their right mind would want to live there year around? An unintended consequence of this proposal will be that few, if any prospective employees will ever accept employment to work in the Valley. So where will the work force come from? Again, where is the common sense, responsibility and integrity in planning? This proposed change must not occur!” (Individual, American Canyon, CA - #907)

OUTSTANDINGLY REMARKABLE VALUES

“The relocation of approximately 700 employee beds to El Portal will roughly double the population of this small community which lacks sufficient infrastructure to meet the needs of its existing population. The pressure on the Recreation Outstanding Remarkable Value within the Merced River Wild and Scenic Corridor on both El Portal Administrative Unit and National Forest System lands will be major, long term, and adverse, as opposed to minor, long term, and beneficial as identified on page 4-50 of the Executive Summary. Failure to adequately mitigate the natural resource and social aspects of this dramatic increase in population will significantly reduce the quality of the recreational experience for the visiting public, employees and reassignments located at El Portal and may result in the need to vastly increase the cost of management of this area and or result in the reduction of dispersed recreational opportunities within the Merced River Wild and Scenic River Corridor on National Forest System lands.” (USDA Forest Service, Clovis, CA - #8900)

Response: During several previous planning processes, the National Park Service has considered several locations for relocating housing outside Yosemite Valley. In the 1980 *General Management Plan*, along with providing general guidance for considering opportunities for housing in the region, it was proposed that housing be located at El Portal. In 1992, the National Park Service deviated from this *General Management Plan* element by proposing to place employee housing in Foresta. Placing housing in Foresta was widely opposed by the public; comment response to the plan overwhelmingly called for the placement of housing in El Portal.

Moreover, in 1958 Congress passed the El Portal Administrative Site Act, which allowed for the National Park Service acquisition of land in El Portal for an administrative site.

To accommodate employees who would be relocated outside Yosemite Valley, an employee transportation system would be developed. It is projected that most employees commuting to work in Yosemite Valley would use the employee transportation system.

In Vol. IB, Chapter 4, Environmental Consequences, Social Environment, the analysis found that there would be an increase in the number of employee commuters traveling into Yosemite Valley. However, even though there would be an increase in the number of commuters per day, it is projected that the number of trips per day would remain relatively constant because there would be a reduction in personal vehicle trips, offsetting the increase in the number of employee shuttle trips

Employee housing in El Portal is consistent with the provisions of the *Merced, River Plan/FEIS*. The potential impacts to wild and scenic river values are described in Chapter 4, Environmental Consequences.

For these reasons, it is reasonable and feasible to consider El Portal as a location for employee housing.

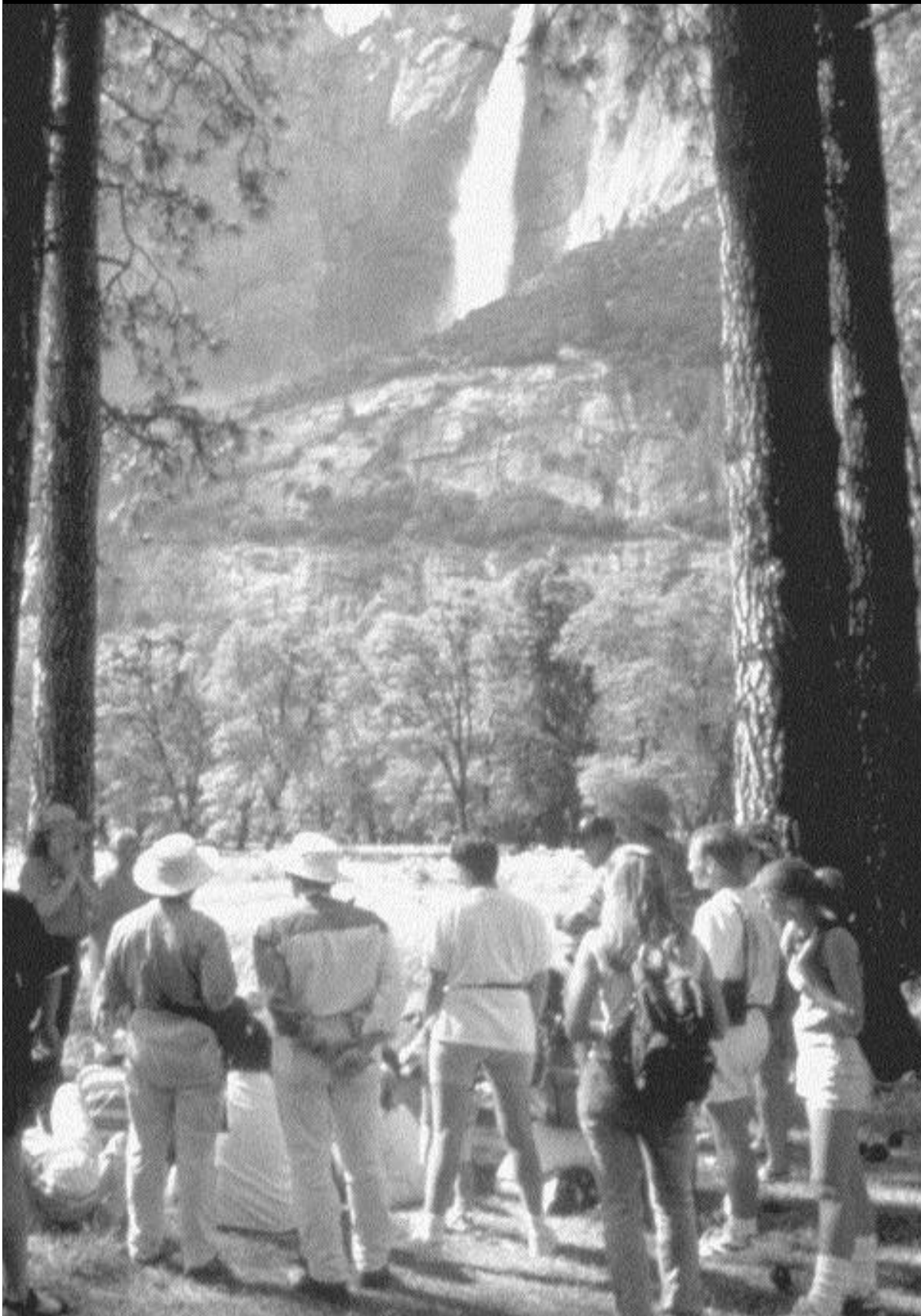
476. Public Concern: The *Yosemite Valley Plan* should require the construction of a community center in El Portal.

“We support the following proposition: creation of a community center at El Portal. The area just east of the post office appears to provide an ideal location for a village green, an open area that could play host to local gatherings and help create a real sense of community. We do believe, however, that housing in that area should be retained (although the existing recreation center and other decaying buildings south of the open area represent prime candidates for replacement).” (Conservation Organization, San Francisco, CA - #4594)

Response: The *Yosemite Valley Plan* calls for many amenities to meet the needs of the El Portal community, including a community center and possibly a town square (see Vol. IA, Chapter 2, Alternatives).



*Public Concerns
from the
Draft Merced
Wild and Scenic
River Plan/
EIS Process
and Responses
Relating to
Yosemite Valley
Planning*



Final
Yosemite
Valley
Plan

Supplemental EIS

Chapter 5 ~ Public Concerns from the Draft Merced Wild and Scenic River Plan/EIS Process and Responses Relating to Yosemite Valley Planning

Introduction

In 1987 federal legislation designated eighty-one miles of the Merced River within Yosemite National Park as Wild and Scenic. Although work had begun on a plan for protecting the Merced Wild and Scenic River within Yosemite National Park, it had not been completed at the time of the devastating New Year's Day flood of 1997. That historic event restructured not only the configuration of the Merced River, but also set in motion a new wave of Yosemite Valley planning. After the flood, Yosemite National Park began reconstructing the heavily damaged El Portal Road. Legal action pertaining to that project's environmental assessment resulted in a mandate that Yosemite National Park complete a Comprehensive Management Plan and Environmental Impact Statement for the Merced Wild and Scenic River. The *Draft Merced Wild and Scenic River Comprehensive Management Plan/Environmental Impact Statement (Draft Merced River Plan/EIS)* was released for public review in January 2000. The *Merced Wild and Scenic River Comprehensive Management Plan/Final Environmental Impact Statement (Merced River Plan/FEIS)* was released July 2000, and the Record of Decision signed on August 9, 2000. The *Merced River Plan/FEIS* brings together federal law and National Park Service management direction to create an integrated plan for the river that will provide a foundation for future actions within the park.

Draft Merced River Plan/EIS

The public comment period for the *Draft Merced River Plan/EIS* ran from January 7, 2000 to March 24, 2000. The resulting number of responses and comments is summarized in Table III.5.1, which offers three different ways of looking at how many people submitted input and how many comments they offered during this public comment period. The first column, titled "Number of Responses," displays the total number of pieces of correspondence (letters, faxes, emails, comment forms, and public testimony). The second column reports the number of signatures tabulated from all responses, including petitions. This number provides the most accurate gauge of how many people, whether individually or as co-signatories to a letter, offered input during the comment period for the *Draft Merced River Plan/EIS*. The third column displays the number of comments coded, categorized, and entered into the comment analysis database. Although there is no distinct correlation between the numbers presented in each column of this table, the number of comments relative to the number of responses for a given planning effort can give readers some indication of the level of detail in public input (this same description applies to Tables III.5.3 and III.5.4, below).

Table III.5.1 – Number of Responses, Signatures, and Comments Received During Public Comment Period for Merced River Plan

Number of Responses	Number of Signatures	Number of Comments
2,320	2,513	5,097

Because Yosemite National Park had engaged in multiple planning efforts since 1980, the year Yosemite’s *General Management Plan* was completed, a letter received during the comment period for the *Draft Merced River Plan/EIS* may have contained comments on other plans. Comments relating to both the *Draft Merced River Plan/EIS* and the forthcoming *Draft Yosemite Valley Plan/SEIS* were tracked during the analysis of public comment for the former: the total number of comments for each is displayed in Table 2; Table 3 shows the breakdown of responses and comments relating to the *Draft Yosemite Valley Plan/SEIS*.

Table III.5.2 – Number of Comments Sorted by Planning Process
Summary of Public Comment, Merced River Plan

Plan Name	Number of Comments
Merced River Plan (MRP)	4,409
Yosemite Valley Plan (YVP)	651
Not on MRP or Yosemite Valley Plan	34
Unknown	3
Total	5,097

Table III.5.3 – Number of Responses, Signatures, Comments, and Concerns on the Yosemite Valley Plan Received During Public Comment Period for Merced River Plan

Responses	Signatures	Comments	Concerns
658	684	651	178

This chapter presents the 178 public concern statements, and their supporting quotes, that came out of public comment on the *Draft Merced River Plan/EIS* and relate to the *Draft Yosemite Valley Plan/SEIS*, along with National Park Service staff responses. These concerns were evaluated, along with the concerns presented in Chapters 2, 3, and 4 of this volume, as part of preparing the *Final Yosemite Valley Plan/SEIS*. Note that the responses to these concerns are written from the perspective of the *Yosemite Valley Plan* and therefore may differ somewhat from responses to those same concerns as presented in the *Final Merced River Plan/FEIS*.

Comment Analysis Process

The letters, emails, and faxes represented in this report were analyzed by the U.S. Department of Agriculture, Forest Service, Washington Office Ecosystem Management Staff, Content Analysis Enterprise Team using the same process as used for the analysis of public comment on the *Draft Yosemite Valley Plan/SEIS*. (See Chapter 8 for a description of this process.)

For more information on the public input for the *Draft Merced River Plan/EIS*, refer to the *Merced River Plan/FEIS*, Appendix I, “Summary of Public Comments and Responses” (NPS 2000c). For additional information, the reader should refer to the *Summary of Public Comment, Yosemite National Park, Merced River Plan* (USFS 2000c), the original letters, and the database



reports prepared as part of this process and available in the Research Library, Yosemite National Park, P.O. Box 577, Yosemite National Park, California 95389.

How to Use This Document

This summary of comment analysis presents public concerns related to the *Yosemite Valley Plan* drawn from letters submitted in response to the *Merced River Plan*. The order of presentation of topics in this document approximates that of the *Draft Yosemite Valley Plan/SEIS*. Section 1 includes concerns regarding the purpose of Yosemite National Park, the purpose and need for action, relationships between different planning efforts, compliance with land management laws, and public involvement. Section 2 is a placeholder to indicate no comments specific to the range of alternatives were identified from public input. Section 3 analyzes responses in detail organized by area of potentially affected resource or environmental consequence including natural resources, cultural resources, visitor experience, and social resources which include, transportation, scenic resources, socio-economics, access issues, park operations and facilities. As was the case with Chapters 2, 3, and 4, each section is organized in an outline format by topic area.

Draft Merced River Plan/EIS Concern Statements, Supporting Quotes, and National Park Service Responses Related to Yosemite Valley Planning

Section 1 ~ Purpose and Need

Section 1.1 ~ Purpose of the Action/ Need for the Action

1.1.1 General Management Direction

1001. Public Concern: The National Park Service should reduce the level of development in Yosemite National Park.

“The way National Parks are managed must change. We realize now that we do not need to build attractions and glorious lodging to draw visitors. Slowly but surely, the man made obstacles and impact should be removed, beginning with the dams. The golf course should probably get phased out as well, especially if its irrigation needs strain the resources.” (Individual, No Address - #8)

“We have visited Yosemite every year for many years. We have long thought it was overused with too many cars, too much unsuitable development, too much commercialization.” (Individual, Simi Valley, CA - #6140)

“In my view, the National Park Service is jeopardizing the preservation of the national treasure called Yosemite National Park by attempting to serve too many masters. Yosemite Valley is in grave danger of being further developed and urbanized for the short-term benefit of commercial interests and misguided visitors.” (Individual, San Francisco, CA - #1638)

HALT DEVELOPMENT IN THE PARK

“We are dismayed that the Park Service intends on bringing new development projects into Yosemite Park. Hotels should not be expanded; Roads should not be widened; Parking lots should not be enlarged; Tourist facilities should not be increased. Yosemite is a treasure that should remain wild and offer only minimal human access and comfort.” (Individual, Portland, OR - #1410)

Response: The National Park Service acknowledges that the level of development in Yosemite National Park (in particular Yosemite Valley) should be reduced. This fact was recognized in the 1980 *General Management Plan* and remains one of the primary objectives of the *Yosemite Valley Plan*.

As described in Vol. IA, Chapter 1 of the *Final Yosemite Valley Plan/SEIS*, the National Park Service is seeking to achieve the five broad goals of the 1980 *General Management Plan*: (1) reclaim priceless natural beauty, (2) allow natural processes to prevail, (3) promote visitor understanding and enjoyment, (4) markedly reduce traffic congestion, and (5) reduce crowding. A range of alternatives has been developed to meet these goals as they relate to Yosemite Valley. Each of the action alternatives provides a different approach to providing needed visitor accommodation while protecting resources in the Valley and each reduces development in some aspects in the Valley.

In addition, protection of the Merced River and associated resources such as riparian zones, meadows, and wetlands is a key element of the *Final Yosemite Valley Plan/SEIS*, particularly the Preferred Alternative (Alternative 2). Please refer to Vol. IA, Chapter 2, Alternatives, describing highly valued resources as well as a description of Alternative 2 for information regarding the measures proposed to protect the Merced River ecosystem.



With respect to keeping all new lodging outside the Valley, Alternative 2 would reduce overall lodging in the Valley by 24%. Although new lodging would be constructed at Yosemite Lodge to replace some of the flood-damaged units, the total number of units in Alternative 2 (251 units) would remain less than that recommended in the 1992 *Concession Services Plan* (440 units) and less than proposed in the *Draft Yosemite Valley Plan/SEIS*. Lodging at Curry Village would be increased from what was proposed in the *Draft Yosemite Valley Plan/SEIS* to 487 units under the Preferred Alternative. (Also see response to concerns #47, #48, #49, #95, #305, #1002-1005.)

1002. Public Concern: The National Park Service should allow natural processes to continue in Yosemite National Park.

“I have noted in a few places, comment about ‘restoring’ an area to its earlier condition, as in 1880 or 1930. This seems to me inconsistent with the current policy of letting nature take its course – ‘let natural fires burn.’ I realize compromises must be made (keep Mirror Lake from becoming a meadow), but in most cases, the natural processes should be allowed to continue.” (Individual, San Francisco, CA - #45)

Response: As indicated in Vol. IA, Chapter 1 of the *Final Yosemite Valley Plan/SEIS*, one of the five goals of the 1980 *General Management Plan* is allowing natural processes to prevail. Consequently, the action alternatives (Alternatives 2, 3, 4, and 5) presented in Chapter 2 seek not only to protect unaltered natural systems, but also to restore significantly altered systems to a natural state.

Restoration is a tool used to assist in returning impacted areas to a more natural state. As indicated in the Glossary, Vol. IB, of the *Final Yosemite Valley Plan/SEIS*, the concept of restoration refers to work conducted to remove impacts on natural resources and restore natural processes, and to return a site to natural conditions. Restoration is typically deemed necessary when impacts from human use and activity have reduced the capability of a site to recover to natural conditions on its own in a reasonable length of time.

Another way in which the terms “restoration” and “preservation” are used is in reference to historical sites or structures. The National Park Service mission includes historic preservation of such things as landscapes that have been determined to be of historical or cultural significance. (Also see response to concerns #1001, #1003-1005.)

1003. Public Concern: The National Park Service should restore Yosemite National Park to a more natural environment.

“It angers me that an area which was once considered pristine wilderness; is threatened, once again, by more development. I am disgusted that my tax dollars will be used to fund any development project. I do not support development, and I don’t want to see my tax dollars support it. Instead of an upscale resort, why not spend the money on restoration projects? People visit Yosemite to experience the beauty and serenity of the wilderness. Who will want to visit Yosemite Valley when it’s covered in asphalt? I know I won’t. So instead of using money to build a new parking lot or restaurant, why not use it for restoration of Yosemite to its full potential. Use the money to find ways to lessen the impact that tourism has instead of increasing the impact with over development.” (Individual, Sacramento, CA - #134)

Response: The National Park Service acknowledges the fact that it should help restore portions of Yosemite National Park (in particular Yosemite Valley) to a more natural environment. This was recognized in the 1980 *General Management Plan*, and remains one of the primary objectives of the *Final Yosemite Valley Plan/SEIS*. Each of the action alternatives proposed in the *Final Yosemite Valley Plan/SEIS* incorporate elements that focus on restoring, protecting, and enhancing the natural environment within Yosemite Valley. In addition, each of the action alternatives would also implement guidance and direction outlined in the *Merced River Plan/FEIS* to protect and enhance the river’s unique values for the benefit and enjoyment of present and future generations. (Also see response to concerns #47, #95, #305, #49, #48, #335, #1001, #1002, #1004, and #1005.)

1004. Public Concern: The National Park Service should emphasize resource protection in Yosemite National Park planning.

“I strongly support an effort to assess visitor capacity to determine the maximum level of visitor use acceptable for resource protection. . . I would hope that river protection would be weighted more heavily than visitor experience when there is a conflict. . .?” (Individual, Snelling, CA - #946)

Response: As indicated in Vol. IA, Chapter 1, Purpose and Need, of the *Final Yosemite Valley Plan/SEIS*, the National Park Service seeks to balance the five goals of the 1980 *General Management Plan* “to ensure both the long-term preservation and public enjoyment of Yosemite Valley.” It is the mission of the National Park Service, as articulated in the Organic Act of 1916, to both “conserve...and provide for the enjoyment of...the scenery, natural and historic objects and the wildlife therein.”

Regarding the assessment of visitor capacity to determine the maximum level of visitor use acceptable for resource protection, the National Park Service has made a commitment, as an action common to all alternatives (see Vol. IA, Chapter 2), to complete a Visitor Experience and Resource Protection study within five years of a Record of Decision on the *Final Yosemite Valley Plan/SEIS*. If the results of the study indicate the need to establish a maximum visitor level for Yosemite Valley, additional environmental compliance and public involvement would be conducted.

In addition, Vol. IA, Chapter 1 of the *Final Yosemite Valley Plan/SEIS* presents criteria for accomplishing the five broad goals of the *General Management Plan*. Included are several specific criteria found in the *Merced River Plan/FEIS* established to protect the Outstandingly Remarkable Values of the Merced River. As a result, resources associated with the Merced River would receive ample protection under the *Yosemite Valley Plan*.

(Also see response to concerns #47, #95, #305, #49, #48, #1001, #1002, #1003, and #1005.)

1005. Public Concern: The National Park Service should not promote Yosemite National Park as a tourist destination.

“The obvious solution is to reduce congestion by ceasing to promote the park as a tourist attraction. Less people will mean less traffic. If people really want to go to Yosemite, let them make the effort on their own.” (Individual, La Habra Heights, CA - #3040)

“We don’t need a Starbucks. We don’t need a roller coaster. It’s not Disneyland. It’s Yosemite Valley. It’s there for the enjoyment of its beauty. It’s not there for recreation, basically. If you want to play golf; you want to ice skate? There are plenty of places to do that.” (Individual, Harbor City, CA - #3055)

Response: Yosemite National Park is a place of extraordinary beauty where people may learn about the nation’s land and history. The National Park Service’s mission serves the public’s interests, which include opportunities to visit such places that are held in common by all. To do this and to provide for fair access, it must make information easily available to all segments of the public. However, public use of park resources must also be consistent with the purposes of the park. The *Yosemite Valley Plan* has been developed with an eye toward maintaining a diversity of visitor experiences and recreational opportunities in Yosemite Valley. The *Yosemite Valley Plan* would further reduce select facilities such as the Ahwahnee tennis courts, which would be restored to natural conditions, and remove or relocate guest facilities that are situated in highly valued resource areas.

(Also see response to concerns #47, #48, #49, #95, #305, #1001, #1002, #1003, and #1004.)

1006. Public Concern: The National Park Service should encourage the use of the larger Sierra Nevada environment surrounding Yosemite National Park.

“Somehow the plan needs to be tied into other beautiful parts of the Sierra, that would absorb some of the load. Each place could provide some facet of the Yosemite Valley experience.” (Individual, Orange, CA - #76)



Response: The *Yosemite Valley Plan* focuses on Yosemite Valley—from Happy Isles at the east end to the El Portal Road and Big Oak Flat Road intersection on the west. It also presents and analyzes actions in adjacent areas of the park and the El Portal Administrative Site that would occur as a result of actions implemented in Yosemite Valley. However, the management and use of areas of the Sierra Nevada ecosystem outside of Yosemite National Park are issues beyond the scope of the *Yosemite Valley Plan*. This plan does analyze the cumulative effects of other actions in the region in conjunction with the impacts of each of the *Yosemite Valley Plan* alternatives. Please refer to Vol. IB, Chapter 4, Environmental Consequences, of the *Final Yosemite Valley Plan/SEIS* for analysis of cumulative impacts.

In 1992, the U.S. Forest Service, Pacific Southwest Region initiated a planning effort throughout the Sierra Nevada known as the Sierra Nevada Ecosystem Project (SNEP). This effort, now known as the Sierra Nevada Framework for Conservation and Collaboration, combines the latest scientific information with broad public and intergovernmental participation in natural resource planning to form a national forest management policy. Refer to Vol. II, Appendix H, Cumulative Impact Scenario, for a brief description of this regional planning effort.

1007. Public Concern: The National Park Service should consider cumulative impacts from park projects both inside and outside Yosemite National Park.

“The Yosemite NPS has assumed that cumulative effects and impacts apply only to future projects outside the Park such as the anticipated Hazel Green development. There is the potential for numerous projects inside the Park which must conform to the Council on Environmental Quality’s directive that even minor projects must include an assessment of cumulative impacts.” (Individual, Mariposa, CA - #62)

Response: The cumulative impacts section of the *Final Yosemite Valley Plan/SEIS* includes a list of projects within Yosemite National Park as well as outside the park that have been evaluated in conjunction with the proposed action alternatives. All of these past, present, and reasonably foreseeable future projects—both major and minor—inside and surrounding Yosemite National Park have been included in the assessment of cumulative impacts. These projects are listed in Vol. II, Appendix H.

Section 1.2 ~ Direction for this Planning Effort

1008. Public Concern: Yosemite National Park planning documents should address balancing visitor experience with protecting the natural environment.

“The general approach in the Yosemite Valley Plan has been weighted in favor of resource preservation and against human enjoyment of the trails, river and natural scenic beauty. The Park Service’s direction which says the beauty needs to be preserved for future generations, means for future generations to see, use and enjoy. My hope is to see Yosemite balance nature, people, preservation, and enjoyment. Let’s maximize the human enjoyment and minimize the harmful human impact.” (Individual, La Jolla, CA - #3034)

“Documents often refer to maintaining the quality of the Park for future generations; however, if future generations will not be able to visit the Park due to rigid constraining rules then who are we really maintaining the Park for? Yosemite is in a constant state of change. The documentation acts as if the environment is static and that actions can be taken to maintain it as such. It is very important to realize that change will occur and that man is a part of the environment and to some extent will influence and promote such change in a natural way. The key is that man is a part of the environment!” (Individual, Simi Valley, CA - #3070)

“When you preserve for the future are you condemning the present? The future is never now. Mother Nature is reworking the park all the time. The people have never ‘hurt’ the park. Sheep grazing did not ‘hurt’ the park. Give us back the park instead of preserving it for park rangers.” (Individual, Indio, CA - #155)

Response: As described in Chapter 1 of the *Final Yosemite Valley Plan/SEIS*, the National Park Service is seeking to achieve the five broad goals of the 1980 *General Management Plan*: reclaim priceless natural beauty, allow natural processes to prevail, promote visitor understanding and enjoyment, markedly reduce traffic congestion, and reduce crowding. A range of alternatives has been developed to meet these goals as they relate to Yosemite Valley. Each of the action alternatives provides a different approach to protecting resources while providing for visitor access and experience of them.

These alternatives have been adjusted in this final plan to reflect the responses received during the public comment period. Please refer to Vol. IA, Chapter 1 of the *Final Yosemite Valley Plan/SEIS* for additional information regarding the National Park Service's planning philosophy and goals for meeting visitor enjoyment and resource protection needs in Yosemite Valley; refer to Vol. IA, Chapter 2 Alternatives, of the final plan for strategies for managing the Valley to best achieve these goals.

1009. Public Concern: The National Park Service should base Yosemite National Park planning decisions on the desires of the majority of park visitors.

"YNP offers something for all types of visitors. The high country offers the challenge to those seeking solitude and the wilderness experience. But judging from the small number of those requesting wilderness permits, the overwhelming majority of visitors want a more 'civilized' Yosemite experience as found in the Valley. Then why is it assumed that Valley visitors want more wilderness experience when the numbers indicate the opposite?" (Individual, American Canyon, CA - #3126)

Response: Public involvement is a key element of the Yosemite Valley planning and National Environmental Policy Act processes. The National Park Service has gone through considerable effort, time, and expense to document and consider all the comments received from agencies, organizations, and individuals throughout the Yosemite Valley planning process. For many issues, such as the appropriate level of facilities development in the Valley, there is not a clear-cut direction voiced by the public; the diversity of opinions is as varied as those providing feedback.

As the managing agency for Yosemite National Park, the National Park Service is entrusted to make decisions regarding the future of Yosemite Valley. Public involvement is an important factor utilized in making these decisions. However, other factors must also be considered, including the park's authorizing legislation, the agency's mission, etc. It is the role of National Park Service to consider all relevant factors and ultimately determine what is best for the future of Yosemite Valley protecting resources while providing for appropriate visitor access. For further discussion of the role of the public, other government agencies, and American Indian tribes in the planning process for the *Final Yosemite Valley Plan/SEIS*, see Vol. IB, Chapter 5, Consultation and Coordination, and this volume (III), especially the Introduction and Chapter I, Publications and Modifications of the Draft Plan.

1010. Public Concern: The National Park Service should ensure that Yosemite National Park plans are adaptable to future changes.

"Yosemite National Park, especially the valley, has been influenced and changed by human activity for many more years than history has recorded. The NPS finds itself at a point where through the General Plan, the DCMP & EIS, and the future plans (Fire Management, Yosemite Valley and the Wilderness Management Plan) under consideration will provide direction into the future. How long into the future? With the vision to allow minor adjustments within a chosen alternative each plan can stand for many years. Any plan must have the ability to change." (Individual, Quincy, CA - #6258)

Response: The *Final Yosemite Valley Plan/SEIS* has been prepared assuming a management life of approximately 20 years. Although the plan would guide actions required to implement the five broad goals of the 1980 *General Management Plan* during this time period, the planning process for Yosemite Valley would by no means be static. Following selection of an alternative by the National Park and



subsequent documentation in a Record of Decision, the process of implementing actions identified in the *Yosemite Valley Plan* could begin. This process would typically include site-specific planning and design for facilities removal, construction, or restoration, and provide a vehicle for minor adjustments to elements of the selected alternative as needed. Should more substantial changes to the selected alternative be deemed necessary that could result in impacts not previously analyzed, additional environmental compliance and public involvement would be completed as appropriate. The National Park Service can respond to changing conditions and needs over the 20-year life of the plan by amending the *Yosemite Valley Plan* as necessary, in much the same way the 1992 *Concessions Services Plan* amended the 1980 *General Management Plan*.

1011. Public Concern: The National Park Service should develop natural resource management goals in Yosemite National Park based on local and regional assessments.

“The authors of the Plan note that more detailed analysis will be conducted for site-specific projects, but management planning for wildlife, vegetation, and special status species should not be done on such a piecemeal basis. The approach used should be to gather data on the status of habitats and species in a local and then regional context, and then craft goals for the population or habitat on a regional basis. Armed with this information, the site-specific analysis can be guaranteed to be consistent with that goal. . . each site-specific assessment for impacts cannot fit into a larger framework, and impact assessment and mitigation will be inconsistent. . . How can the Park Service make site-specific management decisions . . . without having an approximate idea of the status of the plant in the park? We know that park-wide, regional data will not be collected for each site-specific project. Obviously it would not be possible to collect such extensive data for every species, but some of the key plants and animals . . . surely should have updated surveys and analysis.” (Conservation Organization, San Francisco, CA - #1705)

Response: One of the cornerstones of the *Yosemite Valley Plan* is restoration and preservation of species and their habitats that have been identified by the U.S. Fish and Wildlife Service, California Department of Fish and Game, and the National Park Service as critically affected by human activities. As such, substantial information exists about the distribution and habitat requirements of these species in the Sierra Nevada. In creating the *Final Yosemite Valley Plan/SEIS*, this information was used to craft actions that would restore important habitats or have minimal impact on special-status species. For some species (e.g., California spotted owl, great gray owl, peregrine falcon, mountain yellow-legged frog), the National Park Service has extensive recent data on their occurrence in Yosemite, and such data were used in formulating the *Yosemite Valley Plan*. For those species without such specific data, the National Park Service took the conservative approach of assuming that the species are present in areas where suitable habitat is present, based upon detailed knowledge of vegetation types in the park. This approach provides an “information buffer” to protect sensitive species and their habitats. Using this information, the *Yosemite Valley Plan* takes into consideration potential regional and local effects on plant and animal species. This general approach is appropriate for evaluation of the wide variety of actions proposed under the range of alternatives, and evaluates regional effects on species both inside and outside the park.

Accepted principals of ecology were among the main factors guiding development of alternatives and actions in the *Final Yosemite Valley Plan/SEIS* that provide maximum benefit and minimum harm to resources. For example, the plan strives to reduce habitat fragmentation and avoid further fragmentation, especially in those habitats identified as critically-impacted in the Sierra Nevada and in those habitats important to a wide range of species. Management on this landscape basis, and in correlation with regional effects on species and habitats, yields the most comprehensive benefit to park and Sierra Nevada ecosystems.

Site-specific surveys will yield more precise information about plants and animals that could be affected, but such surveys must coincide with the timing of the project in order to provide the most up-to-date information. For example, the park service has a reasonable amount of information on the current distribution of California spotted owls in potential project areas, but many actions under the plan may not

occur for years. In the interim, use of habitats by spotted owls in certain areas may change. Areas that currently have no known spotted owls could, by the time of the project, have nesting pairs that could be adversely affected if only the existing data were used in project planning.

1012. Public Concern: The National Park Service should emphasize restoration in planning efforts.

“Any responsible plan for Yosemite should: Design and implement meaningful long-term environmental restoration plans with respect to the human impact issues . . . natural and peaceful enjoyment, wildlife and habitat . . .” (Individual, Mammoth Lakes, CA - #145)

Response: Restoration of natural resources is a key element of Yosemite Valley planning. The *Final Yosemite Valley Plan/SEIS* identifies highly valued resources and proposes varying levels of restoration including restoration of natural areas, particularly riparian, meadow, and wetland communities associated with the Merced River.

However, it is beyond the scope of this *Final Yosemite Valley Plan/SEIS* to provide detailed, site-specific design or restoration plans for all actions being proposed. As discussed in Vol. IA, Chapter 2, Alternatives, Mitigation Measures Common to All Action Alternatives, design level details for a number of elements in the Preferred Alternatives have not been fully developed. Consequently, additional implementation planning or design analysis would be required prior to implementation. Should additional environmental compliance be required for these projects, it would tier from the *Final Yosemite Valley Plan/SEIS*.

1013. Public Concern: The National Park Service should use year-round statistics to develop Yosemite National Park planning documents.

“Yosemite is a year-around park, and planning decisions should not be made based on the most crowded two or three weekends of the year.” (Individual, Livermore, CA - #6348)

Response: Year-round statistics have been considered during the development of the *Final Yosemite Valley Plan/SEIS*, including transportation, lodging demand, housing, and visitor services. With regard to transportation issues, traffic congestion in the park occurs throughout the peak summer season, posing problems to park resources, visitor enjoyment, and operational safety through much of that period. Additionally, the popularity of national parks like Yosemite continues to grow. The *Yosemite Valley Plan* is a long-range plan that seeks to address visitor demands and protect park resources well into the future.

1014. Public Concern: The National Park Service should consider population changes when making planning decisions regarding Yosemite National Park.

“Documents do not address growing population and need to provide greater number of services. It is NPS responsibility to provide access and usage of the Valley to a greater number of visitors and at the same time keeping a balance between the use and the integrity of the Park. The key is balance!” (Individual, Simi Valley, CA - #3070)

Response: In analyzing future visitor use, activities, and services in Yosemite Valley, the National Park Service has considered the potential increased demand for access and services associated with population growth. As indicated in the *Final Yosemite Valley Plan/SEIS* Vol. IB, Chapter 4, Environmental Consequences, Alternative 1—Visitor Experience, the San Joaquin Valley population is expected to double over the next 20 years. Although demand for Yosemite Valley use could increase substantially as a result of projected population growth, a variety of other factors would likely act to reduce or limit demand. Consequently, it is uncertain how future increases in population may translate into visitor demand for access and services in Yosemite Valley.



As indicated in Vol. IA, Chapter 1 of the *Final Yosemite Valley Plan/SEIS*, the National Park Service seeks to balance the five goals of the 1980 *General Management Plan* “to ensure both the long-term preservation and public enjoyment of Yosemite Valley.” Consequently, the alternatives in the *Yosemite Valley Plan* were developed to provide a range of approaches accommodating visitors while protecting resources. Accommodating greater numbers of visitors would likely continue to adversely affect the integrity of park resources in some areas of the Valley. The interrelationships between visitor use and resource condition would be the focus of the Visitor use and Resource Protection study proposed for completion within five years of the Record of Decision for the *Yosemite Valley Plan*. Resource conditions would be monitored to ensure they are not degraded beyond standards established by the visitor experience and resource protection process. Please refer to Vol. IA, Chapter 2, Alternatives, Actions Common to All Action Alternatives for additional information regarding future studies of visitor use in Yosemite Valley.

1015. Public Concern: Management plans for Yosemite National Park should not be driven by political or monetary motives.

“Yosemite is not a destination resort and it should not be set aside for the rich. Replacing campgrounds, where a modest tent can be pitched, with a hotel room may fill the pockets of a politically savvy corporation, but it does not serve the people, the park, or the future. It directly contradicts the purpose of the National Park Service and it is contrary to the spirit of stewardship that should govern your actions. . . We can imagine a Yosemite that is natural and enjoyable for our grandchildren. It may take some ingenuity and it may mean that greed has to take a back seat to integrity. But why would we want Yosemite to be ruled by greed instead of by integrity and ingenuity? . . . Perhaps no one will get rich with a sane and ethical plan, but Yosemite will enrich the lives of generations. That is why we hold it in trust. And that is why you, the people in charge, are there.” (Individual, Coarsegold, CA - #128)

“The Delaware North Concessions Corporation has plans to make its fortune in as many of the national parks as it possibly can. Please stop this threat of the ‘men of great enterprise’ to Yosemite, and to all of our parks forever, if you can. The foolish plans of material man have no place in the gardens of God. What part do businessmen and financiers in the surrounding communities play in these plans, all of them gearing up on all sides for mass accommodations and parking? And what part do the politicians play? Should any of this have anything at all to do with the way you manage our national parks for us?? I think not!” (Individual, Midpines, CA - #131)

Response: As indicated in Chapter 1, the intent of the National Park Service in planning for the future of Yosemite Valley is to adopt the best method for achieving the five broad goals of the 1980 *General Management Plan*, consistent with the park’s authorizing legislation and the 1916 Organic Act. The *Final Yosemite Valley Plan/SEIS* also includes criteria for achieving the *General Management Plan* goals in Yosemite Valley. These goals, legislation, and criteria provide the framework for planning at Yosemite Valley and, along with public involvement, are the forces behind the planning process.

1016. Public Concern: The National Park Service should encourage managers of adjacent lands to adopt a land management philosophy similar to that of Yosemite National Park.

“Any responsible plan for Yosemite should: Seek the same objectives and spirit of protection in the adjacent wilderness and public lands.” (Individual, Mammoth Lakes, CA - #145)

Response: The management of private and public lands adjacent to Yosemite Valley is beyond the scope of the *Yosemite Valley Plan*. The National Park Service will continue to cooperate with adjacent landowners and land management agencies to share information and work toward achieving common goals and objectives. However, management authority and direction for such lands rests with the land management agency or individual(s).

Section 1.3 ~ Applicable Laws, Regulations and Policies

1017. Public Concern: The National Park Service should comply with the National Environmental Policy Act when planning actions in Yosemite National Park.

“In the future, construction projects, such as the El Portal road widening project, should not be developed with out attention to NEPA.” (Recreational Organization, Silver Spring, MD - #1592)

Response: The National Park Service is committed to complying with the National Environmental Policy Act (NEPA) in all of its undertakings in Yosemite National Park, including actions associated with the *Yosemite Valley Plan*. As indicated in Vol. IA, Chapter 1, Purpose and Need, Issues Beyond the Scope of This Planning Effort, the National Park Service would conduct additional planning and environmental compliance as necessary for specific elements of the action alternatives requiring development of design-level details. Such projects would also comply with the National Environmental Policy Act. (Also see response to concern #456.)

Section 1.4 ~ Relationship to other Park Planning Efforts and Projects

1018. Public Concern: The National Park Service should slow down the Yosemite National Park planning process.

“The current Valley Management plan is ill conceived. You cannot put a comprehensive plan about the future of Yosemite together in a few months. And you cannot designate it to a consulting firm. My understanding is that a federal judge gave you as much time as you wanted to complete this plan. So the NPS comes up with a poor plan in only four months. This issue deserves more thoughtful attention than the park service has given it.” (Individual, Monte Sereno, CA - #50)

Response: The National Park Service has been planning for Yosemite Valley for several years, and the *Yosemite Valley Plan/SEIS* is the result of many years of analysis, planning, and public input. The *Yosemite Valley Plan/SEIS* utilizes a wealth of research and data, some of which was developed for previous planning efforts, including the *Draft Valley Implementation Plan*, *Draft Yosemite Lodge Plan*, and *Draft Yosemite Valley Housing Plan*. Additional research was conducted specifically for the *Yosemite Valley Plan* as needed. Thus, the process has occurred over many years, integrated the issues and concerns of several previous planning efforts, and incorporated the findings of years of research.

While the National Park Service did use the assistance of consulting firms in preparing the *Yosemite Valley Plan*, the National Park Service consistently provided oversight of the consulting firms and retained its decision-making authority. The *Yosemite Valley Plan* team also included a host of National Park Service staff with relevant, professional expertise. See list of preparers.

1019. Public Concern: The National Park Service should clarify the relationship between the General Management Plan and all other Yosemite National Park planning documents.

“The Park Service decided that this was an important document and got elevated to equal stature with the General Management Plan, which then raises a concern. If we aren’t getting public input and understanding of this document and it becomes then the guide for the Valley Plan when people are really interested in looking at that. And it comes along and they’re talking about removing bridges and the existing infrastructure and so on. They’re going to find that the decisions are mandated by a document that’s been approved without their awareness. So my concern is that



this document went from an unnecessary requirement, in the minds of the Park Service, to something that now is equal stature to the GMP.” (Civic Organization, Wawona, CA - #3178)

“We strongly support using the 1980 General Management Plan (‘GMP’) as the guiding document for all Park planning. After extensive public review and environmental study, the GMP set levels for day use visitation and overnight accommodations which, in the opinion of many organizations, remain appropriate today.” (Business, Yosemite National Park, CA - #1524)

Response: The 1980 Yosemite National Park *General Management Plan* provides guidance for all decisions made in Yosemite National Park. General management plans are required by the National Parks and Recreation Act of 1978 (P.L. 95-625, Nov. 10, 1978) for all units of the National Park System. Yosemite’s *General Management Plan* remains the foundational document for all other park planning and development plans. Similarly, the *Merced River Plan* is required by the Wild and Scenic Rivers Act. Like the *General Management Plan*, the *Merced River Plan* provides foundational direction for all park implementation occurring within the corridor the Merced River. Both documents are considered “general planning” documents and thus provide guidance for all park implementation plans.

In the early 1990s, park managers realized that a comprehensive planning approach was needed for Yosemite Valley, including specific planning to evaluate alternatives for managing visitor use and resource protection in the face of rapidly increasing visitation. The new information resulting from additional research directed by the *General Management Plan* ultimately led to a decision to prepare a *Yosemite Valley Plan*. The *Yosemite Valley Plan* would implement many of the provisions for Yosemite Valley included in the 1980 *General Management Plan*. However, because it uses the best available information, the *Yosemite Valley Plan* also modifies some of the specific actions included in the *General Management Plan*; as a result, the *Yosemite Valley Plan* is a supplement to the *General Management Plan*. Please refer to Vol.1A, Chapter 1, (Purpose and Need, Introduction) of the *Final Yosemite Valley Plan/SEIS* for additional information regarding the relationship between the 1980 *General Management Plan* and the *Yosemite Valley Plan*.

Section 1.5 ~ Public Involvement and Coordination

1020. Public Concern: The National Park Service should improve public involvement strategies.

PROVIDE ADVANCE NOTICE OF HEARINGS

“It would be nice if you would give more advance notice of public meetings. Less than a month is just not acceptable, especially when the meetings are during the week. More people would be able to participate if the meetings were held on the weekends. Also, it would be helpful if the plans were sent to people sooner. That’s a lot of reading to be done before the public comment time is over.” (Individual, Los Angeles, CA - #5)

INCLUDE CAMPERS

“The Park Service did not include a majority of the public who uses the Park, specifically thousands of new and returning campers each year. Campers register before entering the Park, and the Park Service has a database of campers’ information available. The Park Service could have informed this specific group of these hearings with a postcard that would have costs 20 cents to mail. However, the Park Service has admitted that they did not address or inform this particularly large group of potential participants about the public hearing process.” (Individual, Malibu, CA - #6079)

FORM AN ADVISORY COMMITTEE

“We suggest public involvement every step of the way in the form of—for lack of a better term—an advisory committee composed of representatives from all sectors of the public. This solution will only work as long as the selection process is conducted with impeccable integrity. We believe such an advisory board with park planners and scientists working together every step of the process offers the greatest assurance for the Merced River and Yosemite.” (Individual, Oakhurst, CA - #6081)

Response: Although an important part of the planning process, these concerns are outside the scope of the *Yosemite Valley Plan*. Public meetings were scheduled to occur when most people could attend—weeknights after work and not on weekends when people typically schedule family commitments. Assessments of past public meetings showed that attendance at weekend venues was less than on weeknights, and many complaints were received regarding having them on the weekend. Public relations experts informed the National Park Service (and it has been confirmed through this planning process) that notifying the public of meetings more than one month prior to an event was not effective; it was too far ahead and many people did not remember or plan for it.

Public meeting notices were mailed to the addresses on the park mailing list, which consists of those who expressed interest in receiving information from the park. Unsolicited mailings are often treated as “junk mail.”

Developing alternatives and the overall content of an environmental impact statement requires a great deal of decision making. The National Park Service involves individuals and organizations in the decision-making process through the plan’s initial scoping and public comment periods. The creation of a park advisory group literally takes an act of Congress. A law called “Federal Advisory Committee Act,” states that government agencies are not allowed to involve private individuals or organizations in decision making except in open public meetings.

1021. Public Concern: The National Park Service should continue to actively involve the public in Yosemite planning.

“First I want to express my thanks for all the work the Yosemite National Park team has put into working on the Merced River Plan and into taking the plan around the state for comment. I attended and spoke at the Berkeley sessions and was favorably impressed by the amount and quality of information that was available, and on the level of expertise in the group working on the plan. Perhaps most of all, I appreciate the attitude of openness to different opinions and the encouragement to express my views that I felt from the Park personnel.” (Individual, Berkeley, CA - #138)

“Thank you for holding your meeting in the Mid-Peninsula (Palo Alto) rather than San Francisco or Berkeley. It was easier to park; and they provided information handy and easier to read! The Park Staff were very available to hear our comments and to help us better understand you Merced Wild and Scenic River Plan. Please don’t hold your Valley Plan Information Meeting in the month of August 2000! I hope you (NPS) will hold future meetings in the general Peninsula Area.” (Individual, San Jose, CA - #3103)

FRESNO

“We are also concerned that when public meetings are held, Fresno is omitted from hosting a public workshop. With a population of ½ million people and a major point of access to the park, it would seem a good location to gather information for your plan formulation. We understand you are dealing with the Merced River Plan, but I believe you will find significant interest in the park in this region.” (Business, Fresno, CA - #606)

“It has come to my attention that Fresno County has not been included as one of the areas for public meetings. Would it be possible to schedule a meeting in Fresno County? As you stated in your letter, public input is vital to park planning and we in Fresno County are very much interested in Yosemite.” (Board of Supervisors, Fresno, CA - #61)



SOUTHERN CALIFORNIA

“During the initial public scoping comment period for the Merced River Plan, the Park Service limited public hearings to six meetings. None of these meetings was held in Los Angeles or San Diego.” (Individual, Malibu, CA - #6079)

“I cannot attend the public meetings, their (sic) too far and I have no transportation. If you had one here in Santa Cruz I would attend. Santa Cruz has a Civic Auditorium that would easily hold every one from throughout the area wishing to attend. and you would have a great attendance this is an Environmentally concerned area.” (Individual, Santa Cruz - #77)

OUTSIDE OF CALIFORNIA

“I just want to state that I have an objection that these hearings are not being held anywhere but in California for a visitor population that is much greater than that. And I’m speaking as a non-native resident of this area.” (Public Hearing, El Portal, CA - #3200)

Response: Although outside the scope of the *Yosemite Valley Plan*, public involvement is a critical component of the Yosemite Valley planning process. Consequently, the National Park Service held a total of 18 public meetings in California and across the nation. Fourteen public meetings were conducted in California for the *Draft Yosemite Valley Plan/SEIS* during the public comment period of over 90 days. Included were several meetings in gateway communities, three meetings in the San Francisco Bay area, two in the Los Angeles metropolitan area, and one each in Fresno, San Diego, and Sacramento. Four additional public meetings were held out of state in the Seattle, Denver, Chicago, and Washington, D.C., areas. In addition to those public participation periods required by the National Environmental Policy act, the National Park Service met more informally with interested groups in gateway communities and throughout the region. The National Park Service is committed to continuing public involvement in current and future planning for Yosemite Valley.

1022. Public Concern: The National Park Service should not impose time restrictions on public verbal comments.

“The ‘moderator’ for the February 3 meeting was quite rude. He was obviously paid for by the NPS which means he was paid by the tax payers. Since there were so few people in attendance, it would have been good p.r. to allow the people there to have their say. One more minute here or there would have caused little problems.” (Individual, No Address - #6029)

“Public hearing participants should have been allowed to use the entire length of time allotted for the comment session – to make comments – even if they had addressed the group before. A two-minute limitation was imposed to limit public comments, participation, dialogue and education.” (Individual, Malibu, CA - #6079)

“I might suggest that to create a document of this size and then to hold public hearings in which you limit public comments to two minutes gives a rather unfortunate impression of how much you value public participation in this process. It appears the NPS would prefer not to know very much- if anything- about what the public thinks about this plan for protecting one of the nation’s most unique and priceless resources the river that runs through Yosemite National Park.” (Individual, Coursegold, CA - #1688)

.” . . .many are not willing to give up two to four hours for only two minutes of input on 1,300 pages.” (Individual, Oakhurst, CA - #3172)

Response: This concern is acknowledged, but is outside the scope of the *Yosemite Valley Plan* itself. In order for everyone to be heard and have the hearing conclude at a reasonable hour, the amount of time available at the public hearings was divided by the estimate of the numbers who would attend. This led the National Park Service to decide on a three-minute time limit. This time limit was maintained at each venue to ensure equality of time for each speaker regardless of what venue they attended. As explained by

the moderator, the oral comments should have been main points that the speaker wanted to get into the process. More detailed and unlimited comment ability was available by using written comments.

1023. Public Concern: The National Park Service should ensure that presenters at public meetings are well informed.

“The public speakers came across as having a passion for camping in Yosemite. The presenters came across like hired guns not really familiar – or passionate about – the place. Their credibility was low.” (Individual, Altadena, CA - #3073)

Response: This concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan*. The presenters were all trained, experienced park interpreters or planners of long standing ability. Many have numerous letters from the public appreciating the quality of their programs and the passion they show for the place. Many members of the public who attended the public meetings complimented the speakers. Also, the presenters were there to present and listen, not make impassioned speeches in support of the plan—they were not there to “sell” the plan, but to explain it.



Section 2 ~ Alternatives

At the time of the review of the *Draft Merced River Plan/EIS*, the *Draft Yosemite Valley Plan/SEIS* had not been released for public review, so there were no actual alternatives to comment on relative to the *Yosemite Valley Plan*. Therefore, comments with specific reference to Alternatives of the *Yosemite Valley Plan* analyzed for this report were assigned to the appropriate topic area in Section 3. For example, comments with reference to the options and appropriate choices for locating transit facilities are captured in **Section 3.11 ~ Transportation**.

Section 3 ~ Affected Environment and Environmental Consequences

Section 3.1 ~ Water Quality

1024. Public Concern: The National Park Service should improve water quality monitoring in Yosemite National Park.

“Since it has been determined that the golf course at Wawona is to continue operations, we would like to request that monitoring of water quality be imposed after wastewater, fertilizers or pesticides are applied. We feel that golf courses are one of the major threats to aquatic health and would like the Park to certify that water quality standards are being met.” (Conservation Organization, Camp Nelson, CA - #242)

Response: This concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan*. The actions considered in the *Final Yosemite Valley Plan/SEIS* pertain to those land uses and activities which occur within Yosemite Valley, and at those areas outside the Valley where there is a functional relationship or connected action between land uses or activities that occur in Yosemite Valley. Therefore, in the *Final Yosemite Valley Plan/SEIS*, actions considered or proposed to occur in Wawona are limited to those that relate to specific land-use changes considered or proposed to occur in Yosemite Valley. In the *Final Yosemite Valley Plan/SEIS*, the relocation of employee housing from Yosemite Valley to Wawona is the primary land-use change being considered. Some employee housing (24 beds) is proposed to help meet deficiencies in employee housing for employees working in Wawona.

Because actions related to the Wawona Golf Course are outside the scope of the *Yosemite Valley Plan*, no changes are considered or proposed for the golf course.

1025. Public Concern: The National Park Service should store fuels above ground in Yosemite National Park.

“We recommend that Compressed Natural Gas (CNG), Liquefied Natural Gas (LNG), Electric Power and other alternative fuels that are not stored underground or can leak into the groundwater should be prioritized immediately for use in Yosemite National Park.” (Conservation Organization, Catheys Valley, CA - #266)

Response: This concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan*. Fuel storage facilities are managed by applicable regulatory requirements and other park directives. The protection of groundwater quality within Yosemite National Park is performed through compliance with the Safe Drinking Water Act, Clean Water Act, and the Porter-Cologne Water Quality Control Act.

1026. Public Concern: The National Park Service should develop a common wastewater system that services Yosemite West, Badger Pass and Chinquapin.

“Yosemite West is in a dire position of having a sewer system upgrade which Mariposa County cannot afford to do . . . I know that one of the ideas the park service has for future parking is using Yosemite West or Badger Pass. Either one is going to have to have a waste water system upgrade. . . run a waste water line down from Badger Pass and pick up the waste water from Chinquapin and Yosemite West . . . to El Portal . . . this line would have to go over the Merced River . . . outside of the park. I think this is a win-win situation for both the park and Mariposa County because both would share in the costs of such a project.” (Individual, No Address, CA - #M-6379)

Response: This concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan*. The 1980 *General Management Plan* provides direction for the *Final Yosemite Valley Plan/SEIS* to



present and analyze alternatives that take a comprehensive look at Yosemite Valley. As a result, the *Final Yosemite Valley Plan/SEIS* only provides general direction and guidance for future management decisions. An issue this specific would not fall under the scope of this plan, but may be considered under one of the park's subsequent implementation plans. If a project such as this was proposed under an implementation plan, it would need to comply with the management elements in that plan.

1027. Public Concern: The National Park Service should address Wawona winter sewage overflow.

“Could the sewage overflow in Wawona area in the winter, be held in holding tanks, to either be removed, or reintroduced, when the water table becomes favorable?” (Individual, Clovis, CA - #152)

Response: This concern is acknowledged; however it is outside the scope of the *Yosemite Valley Plan*. Nonetheless, the National Park Service must conform to the regulatory requirements of the Safe Drinking Water Act, the Clean Water Act, and the Porter-Cologne Water Quality Control Act. The 1996 Safe Drinking Water Act Amendments placed a new focus on source water protection by requiring implementation of source water assessment and protection programs to assess areas serving as sources of drinking water in order to identify potential threats and implement protection efforts. Sanitary surveys of the Merced River watershed and its groundwater resources have been performed as a result of the program and are used to help guide the protection of both surface water and groundwater within Yosemite National Park.

Section 3.2 ~ Wetlands

1028. Public Concern: The National Park Service should increase spending on riparian science.

“Twenty-five percent of the total cost of all future roads, utility crossings, bridges or buildings that are rebuilt or newly constructed within the 100-year floodplain should be allocated for riparian science. This would: (1) provide financial incentive to place this development elsewhere and (2) fund highly needed aquatic invertebrate surveys, fisheries surveys, fluvial geomorphic studies, and riparian endangered species recovery plans. Such studies would pay dividends to the health of the ecosystem quickly and might even save the National Park Service (NPS) money in the end by helping the NPS place roads where they will not be washed out.” (Individual, Fresno, CA - #6083)

Response: This concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan*. The National Park Service will continue to pursue a variety of funding sources for resources management (including riparian studies) through federal and outside sources. Outside sources include park partners such as the Yosemite Fund, the Yosemite Association, and the City of San Francisco (for work related to water quality). Determination of funding allocation, studies needed prior to project implementation within the riparian zone, and other site-specific issues would be addressed in future action plans and site designs following the Record of Decision for the *Yosemite Valley Plan*.

Section 3.3 ~ Vegetation

1029. Public Concern: The National Park Service should emphasize meadow restoration.

“I favor more . . . meadow restoration.” (Individual, Lakeshore, CA - #6286)

“All meadows in the corridor should continue to be protected by either restricting visitor use or providing roped areas and boardwalks.” (Individual, Snelling, CA - #946)

Response: In Yosemite Valley, open meadows intermixed with other vegetation types are an important natural resource and cultural landscape component and are recognized as a highly valued resource. These highly valued resources would receive the greatest level of protection and restoration effort. Also, in the final *Merced River Plan/FEIS*, river-related wetlands, including some meadows, are identified as one of the Outstandingly Remarkable Values for the Merced River in Yosemite Valley. These plans strive to preserve and restore the free-flowing condition of the Merced River and protect and enhance wetlands and riparian habitats including meadows.

Restoration of meadows includes identifying the processes that caused meadow decline, determining whether natural processes can be restored, and carrying out the restoration. In Yosemite Valley, a combination of restoration of the free-flowing nature of the Merced River, restoration of old channels, oxbows, and other hydrologic features, and restoration and continuation of prescribed fires would all facilitate the restoration and protection of meadows throughout the Valley. Fencing, boardwalks, and interpretive or directional signs (as described in *Final Yosemite Valley Plan/SEIS* proposed mitigation measures in Vol. IA, Chapter 2) may also be installed. These measures would be implemented if necessary in all areas where meadow restoration is proposed to occur.

Other aspects of the *Final Yosemite Valley Plan/SEIS* include restoration of natural water flow patterns through removal or modification of roads, paved paths, and parking lots. This would also lead to altered soil moisture with associated shifts in vegetation. The National Park Service would also continue to control non-native plant species and place an emphasis on defragmenting vegetation through the center of Yosemite Valley to improve ecosystem function. This would include linkages of wetlands and riparian areas to current and potential meadow sites. These treatments are proposed to varying degrees in each of the action alternatives, with consequences outlined in Vol. IB, Chapter 4 of the *Final Yosemite Valley Plan/SEIS*.

1030. Public Concern: The National Park Service should address the potential spread of invasive weed resulting from road construction in Yosemite Valley.

“The massive, unnecessary and illegal project to widen the straighten the El Portal Road in Yosemite has created an area 6.5 miles in length which is now highly susceptible to weed invasion. This susceptibility will last 10-15 years or much longer, until the ground story vegetation along the roadway is fully reestablished. The exotics will continue to have ample opportunity to invade and potentially establish populations where native vegetation and rich habitats once thrived. If invaded, and the likelihood is great, the roadway will serve as a conduit for the spread of weed species that are not yet established in Yosemite Valley.” (Conservation Organization, San Francisco, CA - #1705)

SURVEY AND REMOVE YELLOW STAR THISTLE

“The spread of yellow star thistle (*Centaurea solstitialis*) is of particular concern. It is widespread in El Portal, the area adjacent to the construction zone and is highly invasive. It is one of the most, if not the most, dangerously invasive exotic plants in California. It has been prevented from becoming established in Yosemite Valley by the careful and watchful efforts of Park Service resource managers and volunteers. Yellow star thistle now poses orders of magnitude greater threat to Yosemite Valley, as the construction area has created a conduit into Yosemite Valley for invasive weeds to colonize and spread along the road construction area. Previously the intact ecosystem and native vegetative cover in the Gorge did not provide a welcome environment for the yellow star thistle; however, since the construction with the attendant dynamiting and clear cutting of the uphill slopes and dumping of dirt and rocks and rip rapping into the river, a bed has been laid for the possibility of a massive invasion of this destructive weed into the Gorge and on to Yosemite Valley. There must be a long-term commitment to survey for and remove weed areas at a bare minimum of twice each growing season (May-October). This needs to be very intensely monitored especially during the first 3 years or so.” (Conservation Organization, San Francisco, CA - #1705)



Response: The conduit for the spread of many non-native species, including yellow star-thistle, along road corridors entering Yosemite National Park has existed for decades. To combat this, Yosemite National Park is a co-signer (with Caltrans and the County of Mariposa) of a Memorandum of Understanding to establish a Merced Canyon Cooperative Weed Management Area. This area includes the El Portal Administrative Site and the Merced River corridor. Management of weeds along the road corridors leading into the park is critical for preventing or controlling the introduction of seeds of many non-natives that could reach Yosemite Valley. National Park Service staff are dedicated to detecting and removing new infestations of weeds that invade the park as well as controlling and removing existing stands. The National Park Service is working in conjunction with California Department of Food and Agriculture weed specialists using techniques and methods identified in part by research being completed by U.S. Geological Survey - Biological Resources Division staff. Monitoring programs have been established in a number of areas to detect new infestations as well as to monitor the long-term effectiveness of control techniques over the years.

The current reconstruction of the 6.5-mile section of the El Portal Road is outside the scope of this planning effort. However, measures being employed on the project include weed control at staging areas and throughout the project site, no importation of metamorphic topsoil, cleaning construction equipment before entering the site, construction compliance monitoring, revegetation, and long-term monitoring.

The *Final Yosemite Valley Plan/SEIS* evaluates the potential effects of non-native species (introduced or spread) resulting from construction or demolition-related projects and general visitor use in all alternatives. Also, in the *Final Yosemite Valley Plan/SEIS*, mitigation measures specific to non-native species are addressed in Vol. IA, Chapter 2. These measures seek to avoid, minimize, rectify, and/or compensate for the potential introduction or spread of non-native species that would result from implementation of specific actions allowed under the Preferred Alternative. Yosemite National Park currently implements measures to control non-native species throughout the park and, in particular, during construction activities.

1031. Public Concern: The National Park Service should protect Yosemite's oak trees.

"I would hope that the planners would strive to reduce the destruction of Valley and Black Oaks in any development. Regeneration of these big trees takes a lifetime. Restoration of these big trees takes a lifetime. (Individual, Menlo Park, CA - #262)

Response: Yosemite's oak trees are recognized as an important contributor to the ecological and cultural landscape of the park. Regular park planning efforts take into account the potential impacts to these trees (as well as other vegetation), and efforts are made to avoid impacts wherever possible. In the Preferred Alternative in the *Final Yosemite Valley Plan/SEIS*, the National Park Service has focused on protecting and restoring stands of oaks and avoiding impacts in areas where development would continue to occur within these long-lived oak stands.

California black oaks form pure open stands of large stately trees; the stands are unique to the Valley due to thousands of years of anthropogenic activities. Because of their unique stand structure and their important role in providing habitat as well as evidence of past cultural activities, they are one of the highly valued resource vegetation types (see Vol. 1A Chapter 2, Alternatives). These stands are included in the list of resources given the highest priority for protection and restoration, and have been used (in conjunction with the other highly valued resources) to guide land-use planning decisions during the development of alternatives in the *Final Yosemite Valley Plan/SEIS*. In addition, the mitigation measures listed in Vol. IA, Chapter 2, Alternatives, include guidance for protection of individual trees through site design, avoidance, trenching guidelines, and landscaping and yard care guidelines.

The biological Outstandingly Remarkable Value in El Portal, as listed in the *Merced River Plan*, includes diverse vegetation types such as riparian zones that contain Valley oaks. This diverse vegetation would be protected.

1032. Public Concern: The National Park Service should address the impacts of air pollution on flora in Yosemite National Park.

“Although not enforced by law, air quality standards to protect vegetation are even lower than those for people. For example, the state ozone standard for human health is a 1-hr average ozone concentration of 90 ppb, while the national standard to protect vegetation is 80 ppb. Damage has been seen in many forest species at ozone exposures as low as 60 ppb. The protection of trees, wildflowers, shrubs and grasses within Yosemite Valley should provide substantial incentive to improve air quality.” (University of California, Department of Environmental Policy and Management, Berkeley, CA - #138)

PROTECT PONDEROSA PINES FROM OZONE POLLUTION

“Ponderosa pine are the most sensitive tree in the Sierra to ozone damage. In terms of vegetation injury and human health concerns, they can be considered the canary in the coal mine. The level of ozone frequently seen in the Valley is known to damage ponderosa pine, the most abundant tree in Yosemite Valley. These trees provide shade for the camping areas, create the open glade-like feel to El Capitan meadow, and give off the sweet pine scent so characteristic of warm summer days. Although the results of ozone damage studies on the Valley floor are presently unavailable, ozone damage has been observed on ponderosa and the less sensitive Jeffrey pine throughout the Park (M. Arbaugh, USFS PSW Station). The loss of ponderosa pine in the Valley would damage more than aesthetics. They provide important ecosystem functions, regulate temperature, move water through the system, filter air, provide habitat for animals and smaller plants. They also are an important part the beauty, the grace, and the spirituality of the cathedral-like setting which is the magic of Yosemite Valley. Yosemite Valley without its ponderosa pine trees would be a completely different place.” (University of California, Department of Environmental Policy and Management, Berkeley, CA - #138)

Response: The National Park Service is aware of its responsibility to curb air pollution sources within Yosemite National Park to protect not only visitor and employee health but also welfare or nonhealth values, such as visibility, vegetation, and wildlife. In order to monitor ozone trends in the Valley, the park has operated an ozone monitor at Turtleback Dome for more than a decade. The park has been involved in biological effects research and monitoring related to air pollution for many years. Research has determined that ponderosa and Jeffrey pine trees, two key species in Yosemite National Park, are highly sensitive to tropospheric ozone. The park currently monitors both species for early detection of ozone damage.

An overview of methods used to evaluate the impacts of air pollution on park lands is included in Vol. 1B, Chapter 4, Methodologies and Assumptions of the *Final Yosemite Valley Plan/SEIS*. These potential impacts are described in the Air Quality section for each alternative, Chapter 4, Environmental Consequences. Transportation planning has also taken into account the potential for impacts to vegetation through changes in air quality conditions. The National Park Service is committed to the use of alternative fuel vehicles, regulating emissions that can affect air quality, and reducing the likelihood of generating excessive levels of pollutants. Ongoing air quality monitoring will continue to occur in the park and include continuing evaluations of the specific impacts to the park’s flora from regional and local air pollution sources.

(Also see responses to concerns #621 and 197.)

1033. Public Concern: The National Park Service should allow the use of prescribed fire in Yosemite Valley.

“Prescribed burns and prescribed natural fires must be allowed to continue as long as they meet criteria that takes into account a natural fuel loading. Those areas where fire suppression activities have allowed fuel build-up must be



suppressed. Those areas must be prioritized to receive fuel treatment so that prescribed natural fires can be allowed to burn. This natural smoke is again allowable.” (Individual, Quincy, CA - #6258)

“I favor the use of fire (a natural tool) for ecological restoration and fuel management. Fire management only temporarily affects air quality and visual experiences, leaving only the factor of public safety with which to be concerned.” (Individual, Paso Robles, CA - #28)

Response: This concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan*. Yosemite National Park has developed a prescribed burning program that manages vegetation and improves habitat conditions for many species. It has long been recognized that fire is an integral part of the forces that have created Yosemite's natural and cultural landscape, and these activities, as described in Vol. IA, Chapter 3, Affected Environment, and Vol. IB, Chapter 4, Alternative 2, would continue as proposed in the *Final Yosemite Valley Plan/SEIS*. Specific prescriptions for environmental conditions must meet the specific objectives of each prescribed fire, including safety and minimization of smoke and visitor disturbance. Site-specific restoration and habitat management goals are covered in various portions of the 1990 *Fire Management Plan*, the 1993 *Resources Management Plan*, and the 1997 *Vegetation Management Plan*.

1034. Public Concern: The National Park Service should reconsider the goals and timing of prescribed fires in Yosemite National Park.

“To go much beyond this towards recreating the more expansive grasslands of 1866 would neither be more natural (if the fungus is pre-Indian) nor be more attractive. The Plan describes an 8-10 year burn interval for Yosemite Valley and Wawona, yet a 20 - 30 year interval for the much more flammable chaparral communities. An obvious interpretation is that the shorter interval was anthropogenic, that the Indians burned the vicinity of their abodes more frequently. Why would they do so in late summer, when these fires would most likely threaten their creators? Why does your burn policy allow fires to burn into late summer?” (Individual, Oakland, CA - #6276)

Response: This concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan*. Fire management goals and timing are addressed in the update to the National Park Service *Fire Management Plan*.

Section 3.4 ~ Wildlife

1035. Public Concern: The National Park Service should protect wildlife not legally protected by federal or state statutes in Yosemite National Park.

“The importance of identifying, monitoring, and protecting these species is greater than ever. The MRP gives the rationale for dropping special emphasis species designated by the park as, ‘State and Federal listings are more permanent and legally binding than the park’s own designation system.’ While the park’s statement is in itself valid in that the park could be compelled to protect the State and Federal listed species, that does not obviate its duty to protect the plants and wildlife therein unimpaired for future generations. Since the park is lucky enough to have some species that are not threatened by extinction on a country-wide or state-wide level (or at least not yet listed), these are still species that, looked at in the context of the park, are threatened and are a special Outstandingly Remarkable Value that should be protected.” (Conservation Organization, San Francisco, CA - #1705)

PROTECT SPECIES OF CONCERN

“Many species listed as Federal Species of Concern (FC) or California Species of Concern (CSC) deserve listing and protection as a federal or state threatened or endangered species, but are not yet listed. It is even more important to protect those that are not yet listed, but identified. Any species waiting for listing that does not have staff or resources sufficient to bring a petition for listing, is still as threatened whether it is listed, has a pending petition for listing or has not yet had a petition brought. The way that these species achieve listing and protection is through

persons or agencies who are tuned into the localized situation of the species. We would certainly hope that the National Park Service takes its duty to identify, monitor and protect these species seriously. One way to do so, is to keep the species already identified by the park itself as rare or threatened in the ORV list, not to delete them from the list.” (Conservation Organization, San Francisco, CA - #1705)

Response: The *Final Yosemite Valley Plan/SEIS* addresses the legal requirements of the National Environmental Policy Act, Federal Endangered Species Act, and Wild and Scenic Rivers Act with respect to threatened and endangered species as well as other species not formally listed by the state or federal governments. The *Final Yosemite Valley Plan/SEIS* Biological Assessment was prepared by Yosemite National Park, pursuant to Section 7 of the Federal Endangered Species Act, and submitted to the U.S. Fish and Wildlife Service in August 2000 for its review and comment. A revised Biological Assessment based on the *Merced River Plan/FEIS* was submitted to the U.S. Fish and Wildlife Service in August 2000. Both the Supplemental Environmental Impact Statement and Biological Assessment address species formally listed by the federal or state governments, species of special concern as listed by the federal or state governments, and park rare species. In total, the Biological Assessment evaluated the potential effect of the proposed action upon 97 individual special-status plant and wildlife species. The Biological Assessment determined that decisions made under the *Yosemite Valley Plan* are programmatic and no specific commitment of resource is made by the action. Potential residual indirect effects of the proposed action would be avoided, minimized, or compensated through implementation of the conservation and protection measures incorporated into the plan. For information on effects of the *Yosemite Valley Plan* on wildlife, refer to the Biological Assessment reference in Vol. II, Appendix K.

1036. Public Concern: The National Park Service should emphasize human safety in wildlife management in Yosemite Valley.

“Because humans have and will in foreseeable future be caretakers of Yosemite Valley, special consideration should be taken to maintain the Valley Floor safe from wild animals for humans. In my opinion, I see no reason to import coyotes, costly rare birds and or other dangerous wild animals into the Valley Floor because they migrated into the area at some recent time or after the Ice Age. Coyotes can kill or seriously injure small babies and/or children. Bears create hundreds of thousands of dollars damage to automobiles, campsites, etc. It is time humans who inhabit the earth in the billions be moved up the priority list for the use and access in controlled numbers of the Yosemite Valley Floor above bears, coyotes and other dangerous wild animals.” (Individual, Santa Anna, CA - #321)

Response: The issue of wildlife management to protect human safety is operational and is, therefore, outside the scope of the *Yosemite Valley Plan*. Nonetheless, actions and mitigations included in the *Final Yosemite Valley Plan/SEIS* are designed to minimize conflicts between humans and wildlife by providing adequate facilities, education, and enforcement to control the availability of human food to wildlife. Wildlife management issues are addressed in the 1993 *Resource Management Plan*.

1037. Public Concern: The National Park Service should provide alternatives to the wildlife barrier on the north side of the Merced River.

“The effective elimination of wildlife travel overland from the chaparral on the North side of the river – through the creation of a continuous and impassible concrete barrier wall – are not addressed by the CMP. The CMP should propose alternatives to this wildlife barrier.” (Conservation Organization, Yosemite, CA - #6441)

Response: This concern is acknowledged; however it is outside the scope of the *Yosemite Valley Plan*. The new guardwall along the El Portal Road is approximately the same height, dimension, and length as the original guardwall constructed in the early 1900s by the Civilian Conservation Corps. The new guardwall measures 27 inches high by 20 inches wide. The height of the existing (historic) guardwall ranges from 19 to 26 inches high. Several guardwall alternatives were considered during the Value Analysis (VA) process for the El Portal Road Improvements Project, with specific criteria stating that all alternatives must “preserve the integrity and park-like character of the road corridor.” The guardwall is a character-defining feature of the historic El Portal Road travel corridor and its elimination has never been



considered. It does not and has not ever acted as a barrier to wildlife. Larger and mid-sized animals, including deer, black bear, ringtail, and raccoons, are accustomed to traversing the cliffs and boulder-strewn slopes on the Merced River Canyon and can easily jump or scale the wall. Smaller animals can get through the wall by also climbing over, or using the numerous drain openings or frequent breaks in the wall.

1038. Public Concern: The National Park Service should eliminate non-native wildlife species from the park.

“If we can positively trace the physical introduction by humans of a species within the park, and the NPS is obligated to return the park to native, indigenous species, then let us remove that specie.” (Individual, Quincy, CA - #6258)

COWBIRD

“Introduction of exotic plants and animals, of which the cowbird may prove to be the toughest to eradicated, but must be done as soon as possible.” (Individual, Clovis, CA - #152)

FISH

“The Park Service should remove the non-native trout and encourage the frogs and native fish population.” (Individual, Redding, CA - #130)

Response: This concern is acknowledged; however it is outside the scope of the *Yosemite Valley Plan*. The National Park Service addresses wildlife management through the 1993 *Resources Management Plan*.

1039. Public Concern: The National Park Service should develop a comprehensive management plan for areas used by migratory birds.

“We have a lot of birds that migrate. . . We need a comprehensive plan to ensure that these migratory areas are used and preserved.” (Individual, Merced, CA - #3162)

Response: Management plans protecting migratory birds are outside the scope of the *Yosemite Valley Plan*. Actions undertaken by the *Draft Yosemite Valley Plan/SEIS* are designed to improve habitat quality for all species, including migratory birds, in Yosemite Valley. The National Park Service addresses wildlife management through the 1993 *Resource Management Plan*.

1040. Public Concern: The National Park Service should address potential conflicts between bears and humans in Yosemite National Park.

“We always like to be sure that any plan for Yosemite or any other areas allow for the fact that we want to be sure bears are kept away food, and food is kept away from bears. If we provide a habitat that protects bears, we’re providing a habitat the that will protect all . . . the native species in the region. And it will make for a much more pleasant experience for the humans to visit Yosemite..” (Individual, Palo Alto, CA - #3089)

Response: This concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan*. The National Park Service addresses bear and human interaction in the *Bear Management Plan*. The *Final Yosemite Valley Plan/SEIS* does address mitigation measures to reduce conflicts. Prevention of conflicts between humans and bears was a strong issue taken into consideration during development of the *Final Yosemite Valley Plan/SEIS*. Yosemite already has unacceptably high levels of such conflicts, and the park service wanted to make sure no *Yosemite Valley Plan* actions contributed to these problems. As such, proposed new development includes necessary mitigation to provide adequate facilities, education, and enforcement to minimize wildlife access to human food. In Yosemite Valley, minor

reductions in the number of campsites under some alternatives, and restoration of natural habitats could reduce the attractiveness of developed areas to black bears. (Also see Vol. IA, Chapter 2, Mitigation Measures Common to All Action Alternatives.)

Section 3.5 ~ Rare, Threatened, and Endangered Species

Section 3.6 ~ Air Quality

1041. Public Concern: The National Park Service should take all possible measures to reduce local air pollution In Yosemite Valley.

“While Yosemite Valley exceeds the state standard for ozone and particulates, the Park is not required by law to act on its non-attainment, because of loopholes in the California Clean Air Act which forgives the Park its high ozone concentrations due to upwind sources and – as of now – does not impose requirements on PM10 non-attainment areas . . . despite legal loopholes which allow the Park to ignore air quality regulations, the Park should take every measure to curb local pollution sources in the Valley for the health of the visitors that come to enjoy the pristine nature of the Park, for the diversity of sensitive plants and animals which live in the Park.” (Individual, Berkeley, CA - #138)

“Steps should be taken to reduce traffic problems and improve air quality in the Valley.” (National Aeronautics and Space Administration, Moffet Field, CA - #6231)

“Of concern are two major pollutants, ozone and particulates. Since 1993, ozone levels in Yosemite Valley have at some point in the year always failed to meet state human health standards.” (University of California, Department of Environmental Science/Policy and Management, Berkeley, CA - #138)

Response: Yosemite National Park’s mandate is one of environmental protection, and the park’s goal is to limit impacts on resources, including air quality, from internal park operations and visitor use. For example, Alternatives 2, 3, 4, and 5 in the *Final Yosemite Valley Plan/SEIS* propose measures to reduce visitor vehicle traffic and associated air emissions in the Valley relative to existing conditions. Park staff monitors particulate matter at the headquarters near the Valley Visitor Center; they also monitor ozone at Turtleback Dome. Yosemite National Park is using sustainable design and development techniques for future buildings and operations in the park where feasible to achieve reductions in park emissions and energy consumption.

Both the *Merced River Plan/FEIS* and the *Final Yosemite Valley Plan/SEIS* meet National Environmental Policy Act requirements by fully disclosing the current air quality conditions in the park and identifying potential air quality impacts of each alternative (see Air Quality in Vol. IA, Chapter 3 and Vol. IB, Chapter 4). The inclusion of air quality in these two documents does not give the National Park Service authority to impose its mandate on sources of air pollution outside the park. The Federal Clean Air Act and its amendments and the California Clean Air act provide legal guidance to control air pollution sources inside and outside the park. However, as a Class I airshed, Yosemite National Park has an important mandate to participate in decision making on new or modified plans for air pollution sources in the vicinity of the park.

1042. Public Concern: The National Park Service should evaluate air quality impacts from highway expansion projects within the Park.

“The widening route 140 to accommodate more tour buses would increase bus traffic, which would contribute to the particulate and ozone concentrations in the Valley, as well as the Merced River corridor.” (Individual, Snelling, CA - #946)



Pg. IV-92, Alt. One, Doc. Two, Air Quality: What rationale supports the identification of the Highway 41 extension as having a no-net adverse impact on El Portal (River Gorge) air quality? (Mariposa County Board of Supervisors, Mariposa, CA - #1637)

Response: Although the El Portal Road Reconstruction Project from the park boundary to Big Oak Flat Road (National Park Service) is outside the scope of this planning effort, an environmental assessment completed in 1997 concluded that the project would have minor, temporary increases in fugitive dust and volatile organics from construction activities. The *Final Yosemite Valley Plan/SEIS* includes the El Portal Road Reconstruction Project and Highway 41 Extension as part of its cumulative impacts assessment. Reconstructing El Portal Road from Big Oak Flat Road to Pohono Bridge is induced as an action in all action alternatives in the *Final Yosemite Valley Plan/SEIS*. The impacts of this action are documented in Vol. IB, Chapter 4, Environmental Consequences. This action, by itself, would not result in an increase in bus traffic.

1043. Public Concern: The National Park Service should consider the effects of external sources of pollution on air quality in Yosemite National Park.

“Until the entire state is considered an airshed, the airshed divisions can only try to mitigate problems within their areas. If no campfires were allowed in the valley, no cars were allowed in the valley, the valley would still have air pollution. As the west wind blows it will continue to bring with it smog from the San Joaquin Valley. Until an airshed that meets air quality standards files a lawsuit against those that do not, there will be no change in the states overall air quality.” (Individual, Quincy CA - #264)

“I recognize that many air quality issues in the Park are due to air pollution blown down wind from the Central Valley. But just as sedimentation problems of the Merced River need to address land management practices upstream, so do air quality issues need to address air pollution sources upwind outside the planned boundary.” (University of California, Department of Environmental Science, Berkeley, CA - #138)

Response: The California Air Resources Board and local air districts are responsible for developing clean air plans or State Implementation Plans to demonstrate how and when California will attain air quality standards established under both the Federal and California Clean Air Acts. For the areas within California that have not attained air quality standards, the Air Resources Board works with air districts to develop and implement state and local attainment plans. In general, attainment plans contain a discussion of ambient air quality data and trends; a baseline emissions inventory; future year projections of emissions, which account for growth projections and already adopted control measures; a comprehensive control strategy of additional measures needed to reach attainment; an attainment demonstration, which generally involves complex modeling; and contingency measures. Many of California's State Implementation Plans rely on the same core set of control strategies, including emission standards for cars and heavy trucks, and fuel regulations and limits on emissions from consumer products. State law makes the Air Resources Board the lead agency for all purposes related to the State Implementation Plan. Local air districts and other agencies prepare State Implementation Plan elements and submit them to the Air Resources Board for review and approval, and the Air Resources Board forwards State Implementation Plan revisions to the U.S. Environmental Protection Agency for approval.

The National Park Service is active in its role as federal land manager and makes recommendations to the Environmental Protection Agency and the California Air Resources Board regarding protection of air quality and related values in Yosemite National Park, which is a Class I area. The National Park Service also works with the local air quality districts during the State Implementation Plan process and in the review of New Source Review applications. When the counties adjacent to Yosemite National Park achieve nonattainment status, the National Park Service would be involved in conformity determinations as well.

1044. Public Concern: The National Park Service should ensure that all vehicles entering Yosemite National Park comply with state air quality standards.

“... put emissions monitoring stations at the entrances. There are now infrared systems that can measure emissions on vehicles passing by the station. Any vehicle that does not meet California emissions standards should be turned back. Large warning signs could be posted at remote locations leading to park entrances.” (Individual, Harbor City, CA - #3075)

Response: This concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan*. The National Park Service has no statutory authority to implement an emission inspection program for private vehicles.

1045. Public Concern: The National Park Service should analyze the air quality impact of replacing private automobiles with diesel buses.

“The Park Service recognizes that: ‘Reality is that buses for the next 10-15 years will be limited to diesel fuel . . .’ The lack of any comparative analysis between the pollution added by these diesel buses and private vehicles – accommodating the same number of visitors – appears to be a deliberate attempt to avoid addressing the problem.” (Conservation Organization, Berkley, CA - #3129)

“Diesel buses are substantially more polluting than cars. They run continuously, meaning that when riders disembark in the winter, engines are left running so the bus stays warm. In the summer, the engines are left running so the buses stay cool. With the increase in buses, the total experience of the valley will be changed substantially for the worse.” (Individual, Malibu, CA - #3077)

Response: Emissions associated with diesel buses were analyzed for each of the alternatives in the *Final Yosemite Valley Plan/SEIS*. The analysis included diesel bus emissions from additional buses that would displace some private visitor vehicles. For all the action alternatives, emissions associated with alternative fuel buses, including compressed natural gas, propane, and fuel cells, were also analyzed. The results of these analyses are presented in Vol. IB, Chapter 4, Air Quality, of the *Final Yosemite Valley Plan/SEIS*.

1046. Public Concern: The National Park Service should halt plans to proceed with or expand diesel transit and tour bus activity in Yosemite National Park.

“The . . . air quality mandate coupled with the February 24th ruling of the California Air Resources Board with respect to diesel transit should result in an immediate halt to any plans to proceed with or expand diesel transit and tour bus activity in Yosemite National Park.” (County Board of Supervisors, Madera, CA - #603)

Response: The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* states that the National Park Service would consider low noise, low emissions, cost-effective, and best available technology as well as the use of alternative fuels as primary criteria for acquiring in-Valley and out-of-Valley shuttle bus fleets. In addition, the National Park Service is currently replacing its diesel in-Valley shuttle bus fleet. Low noise, low emissions, cost effectiveness, and use of alternative fuels are the criteria for purchasing these vehicles. Additionally, these buses must meet or exceed California air Quality Standards. The air emissions analyses indicate that the use of diesel buses would have a beneficial impact on all emissions except nitrogen oxide emissions in the Preferred Alternative. The use of alternatively-fueled buses would further reduce emissions.

1047. Public Concern: The National Park Service should explore the use of alternative fuels in the Valley.

“YARTS plans should be supported. Currently YARTS is implementing a demonstration project in May 2000 and hopefully it will be successful enough to expand . . . but the buses designed to run (on alternative fuel) are still in the prototype stage. Bringing them on-line and developing the infrastructure to fuel them will apparently take some



time. This should be supported as it will eventually reduce particulate loads along the Merced corridor and in the Valley.” (Individual, Berkeley, CA - #138)

“An effective tram system using natural gas or solar electric vehicles would serve everyone better.” (Individual, Northampton, MA – #8)

Response: Each of the alternatives in the *Final Yosemite Valley Plan/SEIS* evaluates and analyzes emissions impacts for various transit propulsion and fuel systems: diesel internal combustion engine, compressed natural gas internal combustion engine, propane internal combustion engine, and fuel cell with electric motors. Other propulsion technologies, such as hybrids with internal combustion engines and electric motors, may also be appropriate for use in Yosemite National Park.

The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* states that the National Park Service would consider quiet, cost-effective, available technology as well as the use of alternative fuels as primary criteria for acquiring in-Valley and out-of-Valley shuttle bus fleets.

The National Park Service is moving toward the use of the cleanest and quietest transit vehicles feasible in the Valley, and has committed in Vol. IA, Chapter 1 of the *Final Yosemite Valley Plan/SEIS* to continue strategies to implement technologies that reduce mobile sources of air pollution.

Note: One response is provided for concerns #1048, #1049, and #1050, placed following #1050.

1048. Public Concern: The National Park Service should consider restrictions on personal campfires.

“The use of group campfires, for example ranger campfires, instead of individual fires would increase air quality in the Valley substantially. This would allow the reinstatement of the campsites damaged by the 1997 flood without adverse air quality effects.” (Individual, Berkeley, CA - #138)

1049. Public Concern: The National Park Service should ban campfires in the Valley.

“How about a plan to ban campfires in the valley entirely? This is especially important to me in the summer, when the burning of wood only serves to pollute the valley’s air while only providing visitors with a smores experience . . . Every morning you wake up in the valley it smells like smoke and for what reason?” (Individual, Santa Barbara, CA - #6074)

“... you don’t have to remove campgrounds to reduce campfire emissions – just ban campfires! There should be no preference given to Alternatives 3 and 4 on the basis of air quality.” (University of California, Department of Environmental Science, Berkeley, CA - #138)

1050. Public Concern: The National Park Service should not ban campfires in the Valley.

“Campfires are a part of camping. The burning of natural wood produces a smoke that nature can deal with.” (Individual, Quincy, CA - #6257)

Response: This concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan*. Vol. IA, Chapter 3, Affected Environment—Air Quality, of the *Final Yosemite Valley Plan/SEIS* identifies campfires as sources of particulate matter, carbon monoxide, and volatile organic compounds in the Valley. The park has recognized that campfires make significant contributions to air pollution in the Valley and has taken measures to reduce their impact. For example, campfires are permitted only from 5:00 P.M. until 10:00 P.M. from May 1 to October 15, and campfires are permitted only in established fire rings. Collection of firewood, including “dead and down” wood, is prohibited in the Valley, as is cutting alive or dead trees and attached limbs. These rules are widely disseminated to park visitors through the

park's free quarterly newspaper (*Yosemite Guide*), web site (www.nps.gov/yose), and other media. The substitution of group campfires for personal campfires is a method that would be considered in operational approaches to managing campfires. (This response also applies to the two previous concerns, #1048 and #1049.)

1051. Public Concern: The National Park Service should monitor the effect of vehicle travel on air quality in Yosemite Valley.

"The effect on air quality from vehicular travel in the confines of the Valley should be continuously monitored with study of the effects on vegetation and wildlife in the river corridor." (Individual, Snelling, CA - #946)

Response: There are numerous air quality monitoring stations in and near the park that analyze both gaseous and particulate pollutants. For example, monitors in the park include an ozone monitor along with an Interagency Monitoring of Protected Visual Environments site at Turtleback Dome, and a particulate monitor at the park headquarters near the visitor center in Yosemite Valley. However, these monitors cannot distinguish pollution levels attributed to vehicle traffic only. The park has also been involved in biological effects research and monitoring related to air pollution for many years. Research has determined that Ponderosa and Jeffrey pine trees, two key species in Yosemite National Park, are highly sensitive to tropospheric ozone. The park currently monitors both species for early detection of change.

The *Final Yosemite Valley Plan/SEIS* also acknowledges that the California Environmental Protection Agency concluded that the ozone exceedances in 1995 in the southern portion of the Mountain Counties air Basin, which includes Mariposa County, were caused by transport of ozone and ozone precursors from the San Joaquin Air Basin.

1052. Public Concern: The National Park Service should emphasize the ecological need for prescribed fire over its effects on air quality.

"Prescribed burns are extremely important to healthy ecosystems and should take precedence over other causes of particulate matter being added to the air." (Individual, Columbia, CA - #1521)

"Prescribed burns and prescribed natural fires must be allowed to continue as long as they meet criteria that takes into account a natural fuel loading....This natural smoke is again allowable." (Individual, Quincy, CA - #6528)

Response: This concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan*. Yosemite National Park would continue to use prescribed fire where it is determined to be feasible and effective as a means to achieve site-specific restoration and habitat management goals. These activities would be conducted in accordance with the National Park Service 1990 *Fire Management Plan*.

Section 3.7 ~ Scenic Resources

1053. Public Concern: The National Park Service should consider the impacts of development on scenic resources.

"Just make sure that whatever happens enhances the beauty of the Park and doesn't destroy it by adding buildings or parking lots where they are easily visible." (Individual, Fish Camp, CA - #3233)

"Whenever there was a spot where we could see a view of the valley, I saw way too many buildings. I mean, people are here to enjoy nature, not architecture! Please try to at least make these buildings less visible, or take some out." (Individual, CA - #1695)



“No new buildings are to be built in the park and as many existing buildings as possible must be eliminated. What visitor coming to the valley’s edge wants to look down on acres and acres of building roofs and parking lots? It scenery. Think about it.” (Individual, Walnut Creek, CA - #264)

Response: The *Final Yosemite Valley Plan/SEIS* does consider potential impacts to scenic resources. The analysis is located in Vol. IB, Chapter 4, Environmental Consequences.

1054. Public Concern: The National Park Service should consider the scenic value of the historic bridges in Yosemite Valley.

“From the perspective of the quality of visitor experience, these structures [historic bridges] have clear scenic value.” (Individual, Berkeley, CA - #6112)

Response: There is agreement by many that the historic bridges in Yosemite Valley are aesthetically pleasing and contribute to the scenic value of the Valley. However, the 1980 *General Management Plan* specifically describes and emphasizes the protection of the exquisite natural beauty as a major goal; the beauty of human-made structures is not mentioned as a criterion for evaluation. Protection of the Valley’s natural beauty is one of the major criteria of the *Final Yosemite Valley Plan/SEIS*. Because of their cultural significance and rustic appearance, eight of the stone veneered bridges have been listed on the National Register of Historic Places. To different degrees six of those have an impact on the natural flow of the Merced River. They were evaluated based upon the extent to which they each are causing significant and detrimental changes to the Merced River fluvial system, and their importance and continuing use as a structure in the historically-significant traffic circulation system. In order to meet the *General Management Plan* goals of “Reclaim priceless natural beauty” and “Allow natural processes to prevail” and yet preserve a significant representation of this cultural resource, the Preferred Alternative proposes to strategically remove bridges and adjacent reinforcement of the banks in a phased approach. The National Park Service would then evaluate the resulting changes to the river hydrology and ecosystem before any other bridges were removed downstream. The Preferred Alternative proposes to initially remove Sugar Pine Bridge, which is the bridge causing the most significant ecological degradation. If, based on monitoring, Stoneman Bridge continues to cause unacceptable degradation of the river’s natural hydrologic flow, it would then also be removed.

1055. Public Concern: The National Park Service should consider alternative access for viewing Yosemite Valley.

“It is my opinion that a road should be constructed from highway 120 to a viewpoint on the north side of the valley, above Yosemite Falls perhaps. This look out would serve some of the needs of the private automobile and tour bus visitors. An example of what I have in mind can be seen at Canyon de Chelly Arizona, where access to the valley floors is severely restricted. Recompense comes from good auto access to view points on the rims.” (Individual, Sonoma, CA - #166)

Response: This concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan*. Providing additional points from which to view Yosemite Valley would result in impacts to other areas of the park, most of which are designated Wilderness areas. Wilderness areas allow for the development and maintenance of trails, but not for roads and access by motorized vehicles. The *Yosemite Valley Plan* would not alter the existing trails above the Valley floor, allowing for their continued use to access the many views of Yosemite Valley available from these wilderness areas, however the *Yosemite Valley Plan* would not prescribe additional viewpoints accessible by vehicle.

Section 3.8 ~ Cultural Resources

1056. Public Concern: The National Park Service should account for human activities in Yosemite Valley.

“I feel the protection of the park as a whole and the Merced River, and in particular the valley, must take into account man’s presence and activities. To me, man’s activities must include what the Native Americans did to live in the valley, what early settlers did to live in the valley, what modern man has done to vacation in the valley.” (Individual, No Address - #6004)

Response: Human activity is reflected in the landscape and built environment of Yosemite Valley in many ways. The presence of pre-contact American Indians and evidence of other settlers is reflected in the ephemeral archeological sites. The managed vegetation from pre-contact times and the period of early Euro-American settlement, plus continuing National Park Service and concessioner manipulation is evident in open meadows, black oak woodlands, orchards, and formally landscaped areas. The historic structural systems are still in use today in the historic developed areas and in the networks of roads, trails, and bridges. These are described in Vol. IA, Chapter 3, Affected Environment, in the section on cultural resources. In preparing alternatives for the *Final Yosemite Valley Plan/SEIS*, all these cultural resources have been considered in keeping with National Park Service policy and the National Historic Preservation Act. The alternatives preserve and protect these to different degrees. In all cases, however, the trade-offs of losing these valuable resources are acknowledged in the cultural resources impact analysis section of Vol. IB, Chapter 4.

1057. Public Concern: Yosemite National Park land exchanges with the National Park Service should contain protective measures for cultural and archaeological sites.

“Land exchanges can sometimes work out very well for both parties concerned. My only concern here is that Park lands proposed for exchange that contain an archaeological site contain a clause ‘grandfathering’ protection for the site.” (Individual, Paso Robles, CA - #28)

Response: The proposed Yosemite View Parcel Land Exchange is not an action proposed in the *Draft* or *Final Yosemite Valley Plan/SEIS*. However, it is addressed as an element of the cumulative impacts scenario because it is a reasonably foreseeable future action. Protective measures for cultural resources would be considered as part of the detailed planning and compliance for this potential future action. (Refer to Vol. II, Appendix H.)

1058. Public Concern: The National Park Service should not remove any historic structures from Yosemite National Park.

“I would suggest removing no historic buildings or historic bridges.” (Individual, Sacramento, CA - #3133)

Response: All historic structures are an important component of the cultural resources managed by the National Park Service. Indeed, National Park Service policy and federal preservation law require agencies to manage these as important aspects of the heritage of the American people, and to consider the value of historic properties when undertaking planning that might adversely affect these resources. However, the National Park Service must make difficult choices in order to achieve some of the goals and objectives of the 1980 *General Management Plan*. In considering actions proposed in the *Final Yosemite Valley Plan/SEIS*, all historic buildings and bridges were evaluated first for protection and preservation, and then rehabilitation and adaptive reuse. In cases where historic properties must be removed in order to achieve other objectives, these structures would be assessed for feasibility of relocation and adaptive reuse. The National Park Service would demolish a historic structure only when these options have been considered and have been found to be not feasible or practical. Mitigating measures, as outlined in the 1999 *Yosemite*



Programmatic Agreement, would be implemented in situations where historic structures would be relocated or demolished.

(Also see response to concern #528.)

1059. Public Concern: The National Park Service should preserve the Yosemite Pioneer Museum at Wawona.

“I think the Pioneer Yosemite History Center at Wawona has special value, both historically and educationally. To move portions of it might be necessary under this Alternative 3 but it should not be ‘phased out.’” (Individual, El Cerrito, CA - #6150)

Response: The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* does not propose any changes to the Pioneer Yosemite History Center.

1060. Public Concern: The National Park Service should preserve the Lamon Orchard.

“To locate a campground in the Lamon Apple Orchard, however, does not fit into the historical and logical site location parameters. To make matters worse, to eliminate the Lamon Apple Orchard just to make room for campers is the worst possible tradeoff and makes absolutely no sense. As this orchard has historical significance, it should not be uprooted, just to be replanted with another type of apple tree. By eliminating the apples which animals eat each year, ‘civilization provided’ though they may be, their removal may cause the bears to be more aggressive regarding the food in cars, tents and elsewhere. This is a bad trade-off.” (Individual, American Canyon, CA - #3126)

Response: The *Final Yosemite Valley Plan/SEIS* does not propose establishing a campground in the location of Lamon Orchard, nor is replacing the existing apple trees with nonfruiting varieties called for. The earlier *Draft Valley Implementation Plan/SEIS*, however, did propose constructing a campground in the orchard. The action alternatives of the *Final Yosemite Valley Plan/SEIS* proposes different treatments for each of the three historic orchards in Yosemite Valley: removal and restoration of Curry Orchard, neither removal nor cultivation of Hutchings Orchard, and retention and management of Lamon Orchard. (Also see response to concern #46.)

Section 3.9 ~ Visitor Experience

1061. Public Concern: The National Park Service should define visitor experience and its relationship to other core values of Yosemite National Park.

“The visitor experience and its intrinsic relationship to the esthetic, scenic, historic, archaeological, and scientific features or ‘core values’ of Yosemite National Park must be clearly defined. Resource-focused opportunities unique to a national park setting, based on resource preservation as opposed to resource exploitation, provide the framework for such a definition (e.g., camping as a resource-based activity that requires minimal permanent infrastructure vs. lodging replete with buildings, paved parking, and a host of guest services).” (Madera County Board of Supervisors, Madera, CA - #603)

“One ‘undefined’ point is the realm of ‘visitor experience.’ In the General Management Plan Goal, it is loosely associated with visitor understanding and enjoyment with interpretive and educational programs. This is fulfilled in the Merced River Plan Goal of providing diverse recreational and educational experiences that ‘...provide opportunities for enjoyable and educational experiences with the river’s natural and cultural landscapes.’ This definition of experience has much potential to degrade the whole experience of Yosemite park over the long term because it caters to the individual’s preference and predilections and not to an understanding of the park as system. The experiences defined in the plan are an open-ended proposal where much leeway is given to park and ecosystem modification for the sake of voluminous visitors and their particular interests and desires of how they see the park as satisfying their needs. The use of the term ‘visitor experience’ thus can be defined from one emphasizing an individual-benefiting experience to one tied up in a process of natural system understanding and respect. A different

sort of philosophy is especially relevant in this day and age of ecosystem destruction and other environmental blight.” (Individual, Washington, DC - #281)

Response: The definition of visitor experience, including its relationship to other park values, is found in the goals and criteria sections of Vol. IA, Chapter 1, Purpose and Need, of the *Final Yosemite Valley Plan/SEIS*. The visitor experience goals and criteria also need to be read in the context of the resource management goals and criteria. A fully described “desired visitor experience” cannot be formulated for Yosemite’s visitors, because the experience is highly individualized for the several million visitors to the park each year. But the Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* does work toward an appropriate balance of preservation, development, and use that would prevent the park’s natural wonders from being overshadowed by the intrusions of the human environment. In addition, educational programs would seek to instill in visitors a sense of resource stewardship and an understanding of natural processes.

3.9.1 ~ Visitor Use Levels

1062. Public Concern: The National Park Service should ensure access to Yosemite National Park for all people.

“We have to make this an open place where people with disabilities and people who are older can come and enjoy the Park, not just people that can hike in, and people that can walk in or bike in. It has to be open for everybody.” (Individual, Yosemite National Park, CA - #3226)

“Restricting our national park access runs in conflict with why our elected leaders established the creation of national parks and other protected land. All Americans should be welcome in our parks whether a fisherman, camper or just a nature lover.” (Business, Fresno, CA - #606)

Response: Visitor accommodations are provided within the larger context of the National Park Service mission and within the particular limiting characteristics of Yosemite Valley (see Vol. IA, Chapter 2, Developing a Range of Alternatives—Development Considerations, and Resource Stewardship—Highly Valued Resources). It is clear that Yosemite Valley cannot accommodate a limitless number of people. But the Preferred Alternative in the *Yosemite Valley Plan* would accommodate in the Valley’s overnight facilities and day-visitor parking facilities the maximum daily visitation level specified in the 1980 *General Management Plan* (18,241). Additional visitors would be able to enter the park via public transit. The *Yosemite Valley Plan* would enhance Valley access in other ways: improved information available in advance of a visit; better visitor orientation and information when in the park; and improved access to larger areas of Yosemite Valley by bicycle, walking trails, and shuttle bus.

The National Park Service will comply with the Architectural Barriers Act, the Rehabilitation Act, and the Americans with Disabilities Act in facilities and programs. To this end, the *Yosemite Valley Plan* would require that shuttle buses and other facilities be accessible for visitors with disabilities. Overnight lodging in the Valley would continue to be accessible by personal vehicles or transit buses. Analysis of and planning for accessibility would be conducted throughout the implementation of the *Yosemite Valley Plan*. The phasing schedule for the *Yosemite Valley Plan* would also stipulate that until transit vehicles and facilities are accessible, access for visitors with disabilities would continue essentially the same as now, by the use of personal vehicle placards for access to parking spaces at principal Valley destinations.

1063. Public Concern: The National Park Service should establish a visitor carrying capacity in Yosemite National Park.

“I would suggest that the Park Service has never thoroughly considered the possibility for the carrying capacity of anything in the Park including humans. I guess that’s one of the most important things that should be done; it should be done soon.” (Public Hearing, Merced, CA - #3160)



“The appendices refer to a ‘carrying capacity’ study by the University of Vermont; however, Superintendent Mihalic is on record as stating that this is a ‘preference study,’ not a carrying capacity study. Where are the carrying capacity studies that would enable the public to differentiate between the ‘kinds and amounts of public use which the river area can sustain’ without degradation. We hear the yet-to-be-released Valley Plan contains a section calling for carrying capacity studies - but according to the Federal Register guidelines, such studies need to be in place right now as an integral part of this plan.” (Individual, Oakhurst, CA - #6082)

DISREGARD IMPACT ON CONCESSIONAIRES

“The capacity of the valley is a serious issue. It has not been addressed by the NPS which has lead to many of the problems. It is equally important to mention that the concessionaire would prefer to not have a limit placed on the number of daily users. The pressure from them upon the NPS must be monumental. However, it must occur. The potential to make profits by the concessionaire will not be reduced significantly. . . Eliminating some of the concessionaire accommodations should take place. Reducing the density of the total consumer will relieve pressure upon the systems at work in the valley.” (Individual, Quincy, CA - #6258)

Response: In Vol. IA, Chapter 2, Actions Common to All Action Alternatives—Visitor Use, the *Final Yosemite Valley Plan/SEIS* discusses the concept of carrying capacity. The *Yosemite Valley Plan* and the *Merced River Plan/FEIS* have both called for more rigorous implementation of the Visitor Experience and Resource Protection process, which addresses the issue of visitor use levels by identifying indicators of critical conditions, the standards for those indicators, and a constant monitoring process. If the results of the Visitor Experience and Resource Protection study indicate the need for establishment of a maximum visitation level for Yosemite Valley, supplemental environmental compliance and public involvement would be conducted prior to establishing the use levels.

1064. Public Concern: The National Park Service should encourage off-peak season use of Yosemite National Park.

“Visitors who utilize the park during off-peak times and use the less traveled areas of the park should be rewarded and encouraged, not hampered by policies directed toward users congregating in the most popular areas.” (Individual, Livermore, CA - #6348)

Response: The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* calls for a system of out-of-Valley parking and shuttle buses to handle demand during periods of peak visitation. The level of parking facilities in the Valley is designed to accommodate present off-peak season use without the need for out-of-Valley parking and shuttle system. Thus, off-peak visitors should not be greatly affected by the provisions made for out-of-Valley parking. The Preferred Alternative also proposes the development and implementation of a traveler information and traffic management system. This system planning effort would include public participation and compliance activities and would be based on the provisions outlined in the Preferred Alternative of the *Final Yosemite Valley Plan/SEIS* and the Record of Decision. A purpose of the system would be to inform visitors of the park's lodging, camping, and day-visitor facilities and the necessity of advance planning if one desires accommodations in Yosemite Valley during the periods of peak demand. The system would also point out the benefits derived from off-peak season visitation.

(Also see response to concerns #605 and #36.)

1065. Public Concern: The National Park Service should emphasize use of accommodations and services provided outside of the park.

“To the maximum extent possible, we should be relying on accommodations and other services provided by the private sector outside the park rather than facilities (NPS or otherwise) in the park, especially in Yosemite Valley itself.” (Individual, Indianapolis, IN - #7)

Response: This concern statement is consistent with direction of Congress, National Park Service Management Policies, and the broad goals of the 1980 *General Management Plan* and as such is being

implemented in the action alternatives. In this age of increasingly available rapid transportation and development of recreation, lodging, and camping facilities in gateway communities, visitors are no longer dependent on overnight accommodations (camping and lodging) within Yosemite Valley to facilitate a visit to Yosemite National Park. Nonetheless, it is recognized that there is great value in being able to experience Yosemite Valley in the evening, night, and early morning, and overnight accommodations facilitate this special experience for park visitors. Determining the appropriate amount and types of overnight accommodations to provide a quality visitor experience remains the difficult question which this plan addresses.

(Also see response to concerns # 21, 69 and 213.)

1066. Public Concern: The National Park Service should rotate land use in Yosemite National Park.

“Ranchers have learned over the years that if they rotate their animals so that they spend some time not near the rivers, but the rivers near their land are better protected. So why aren’t we doing this at Yosemite? Why aren’t we rotating where the people are so that the land has time to recover? If they have to be on the north side of the River for a while, then they’re there; move them over to the south side, give the other side a chance to rest.” (Individual, North Hollywood, CA - #3061)

Response: Land use such as campgrounds, picnic areas, and other facilities generally involves the installation of permanent infrastructure including restrooms and asphalt (to prevent development of rutted roads and high levels of dust), and temporary features such as grills and tables that negate the potential for ecological restoration of a site. High levels of human use of these areas results in a variety of long-term impacts that will not recover during short "rest" periods. These include soil compaction, loss of nutrients through removal of woody debris, loss of soil infiltration capabilities, and alterations in hydrology from these surface impacts as well as impacts to subsurface flows from the damming effects of utilities and road base. There are permanent impacts to overstory tree species because of these soil and hydrologic changes resulting in loss of overstory vigor. Other impacts include loss of seed-producing vegetation; lack of regeneration of slow-growing shrub and tree species with eventual loss of mid- and upper-level canopies over time; and encroachment by non-native species due to lack of natural ground cover.

Loss of natural hydrology, fire patterns, and other natural processes also negate the possibility of an impacted area providing habitat for wildlife species. It generally takes years for a site to recover to the point where it does provide habitat and functions naturally. This recovery process is generally assisted through soil decompaction, weeding, revegetation, and the removal of structures and facilities. Rotational use and restoration would not achieve the goals of the *General Management Plan* and would result in larger areas of impact and development than currently exist in Yosemite Valley.

3.9.2 ~ Access Quotas

1067. Public Concern: The National Park Service should restrict the number of visitors entering Yosemite National Park.

“I feel that it is inevitable that more people in the future will visit Yosemite. Nevertheless the park should restrict the number of people who visit the park. The park should reserve space on a first come first served basis. There should definitely be limits to the number of people allowed to visit Yosemite.” (Individual, No address - #3165)

“... controls should be placed on the number of visitors to Yosemite Valley in order to protect this resource for future generations.” (Individual, Granada Hills, CA - #125)

“Many parts of the Sierra wilderness areas require a permit to enter and many trails have quotas to prevent further degradation and to restore affected ecosystem areas. Why shouldn’t the Park Service put Yosemite Valley on a similar quota system to protect and restore the natural ecosystems?” (Individual, Redding, CA - #130)



RESTRICT ACCESS DURING PEAK PERIODS

“Limiting the number of visitors coming into the park during the summer months would help solve over crowding.” (Individual, Bell, CA - #963)

“There is no question that daily visitation into the park needs to be controlled during peak periods and holidays. No one likes crowded situations particularly in a place where personal experiences related to nature are what one leaves with.” (Individual, Stockton, CA - #591)

“There is no debate that there is a level of use of the valley that is excessive. The issue then is determining when that threshold has been reached. It is time that the public and the NPS recognize that that level is already being reached during peak days and that access to Yosemite must, at times, be restricted. It is also time to recognize that restricting access at times is not a bad thing.” (Individual, Berkeley, CA - #6098)

ESTABLISH A RESERVATION SYSTEM

“I am not able to understand why a reservation format is not used to control the number of visitors in the park. Visitors would pay a fee and receive a ticket for a prescribed period of time.” (Individual, Catheys Valley, CA - #960)

“... the Park cannot even comfortably accommodate the current population; even if new parking and facilities were installed all over the park, it would not even begin to accommodate the projected increased population. . . It will probably be necessary to implement a more comprehensive reservation system and quota plan. Given time, I feel that visitors will be able to adapt to this system. Reservations and advance planning are not difficult, and most people already do this for their vacations. After all, what family would pack up and fly off to Orlando for a vacation without a hotel reservation? The Park Service can help to alleviate the annoyance by making sure that publicity is sent out well in advance of the changes.” (Individual, Portola Valley, CA - #1532)

“You must find ways to keep people from loving the valley and river to death. ONLY by limiting the number of people and the duration they stay in the valley can you protect the river. Until the Park Service really forces people to make reservations to the valley and have their stay limited will the natural ecosystem of the valley be protected as it was meant to be under the law.” (Individual, Redding, CA - #130)

Response: The *Final Yosemite Valley Plan/SEIS* does not propose specific limits on visitation. While the 1980 *General Management Plan* prescribed a maximum daily use (i.e., day and overnight use) level for Yosemite Valley, its analysis was facility- and vehicle-based with no criteria for protection of resources or visitor experience. The *Final Yosemite Valley Plan/SEIS* proposes to complete a Visitor Experience and Resource Protection study within five years of the Record of Decision for the *Final Yosemite Valley Plan/SEIS*. For further information, see Vol. IA, Chapter 2, Visitor Use in Yosemite and Land Management Zoning.

1068. Public Concern: The National Park Service should avoid limits on the number of visitors to Yosemite National Park.

“I’m starting to figure out that in a few cases it’s more important to sacrifice a little serenity, (maybe even sanity), in a beautiful natural setting by exposing it to a lot of folks, (of course, in as compatible way as possible), than it is to guard it ‘to death’ by limiting visitation opportunities, thus denying folks the chance to begin having good preservation ethics. And so, allowing numerous compatible recreational activities, such as swimming, rafting, sight-seeing on foot, etc., so that people, especially young people, will associate pleasant memories with such incredible natural beauty, actually is a good thing.” (Individual, Salt Lake City, UT - #29)

“The park and river offer grand experiences which should be available and convenient to as many as possible. Thus we are opposed to any plans that place restrictions on public access to Yosemite and the river.” (Individual, Tucson, AZ - #6019)

Response: No criteria have been developed to establish limits on visitor use to protect resources and visitor experience values. The *Yosemite Valley Plan* does not propose specific limits on visitation to the

Valley. The plan proposes to complete a Visitor Experience and Resource Protection study within five years of a Record of Decision. If the results of that study indicate a need to establish maximum visitation levels for Yosemite Valley, supplemental environmental compliance would be conducted as required.

In Vol. IA, Chapter 2, Actions Common to All Action Alternatives—Visitor Use, the *Final Yosemite Valley Plan/SEIS* discusses the concept of carrying capacity. The *Yosemite Valley Plan* and the *Merced River Plan/FEIS* have both called for more rigorous implementation of the Visitor Experience and Resource Protection process, which addresses the issue of carrying capacity by identifying indicators of critical conditions, the standards for those indicators, and a constant monitoring process. If the results of the Visitor Experience and Resource Protection study indicate the need for establishment of a maximum visitation level for Yosemite Valley, supplemental environmental compliance and public involvement would be conducted prior to establishing the use levels.

3.9.3 ~ Access for Visitors with Disabilities

1069. Public Concern: Yosemite National Park planning should emphasize the need for access to Yosemite National Park for people with special needs.

“What are we doing for the disabled people? I don’t see any disabled access to the River being listed.” (Individual, North Hollywood, CA - #3061)

“There must be a policy of commitment to provide access for persons with disabilities, as the Americans with Disabilities Act requires. I did not see that commitment in the Draft.” (Individual, San Francisco, CA - #45)

“Those fit enough to seek out the untouched beauty of the park can do so by hiking on one of the many trails around the park. Those unable to physically move about this way, should have the opportunity for as much access as the park can provide without damage to the environment...” (Individual, No Address, #3165)

“We do not believe that the Plan places adequate emphasis on providing valuable park experiences for the elderly and handicapped. We hope that the Yosemite Valley Plan will address these needs.” (Individual, Pasadena, CA - #6063)

Response: The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* provides a range of facilities to accommodate people with special needs. It is the National Park Service’s intention to provide access to the extent possible, reasonable, and consistent with its mission. The National Park Service would comply with the Architectural Barriers Act, the Rehabilitation Act, and the Americans with Disabilities Act in park facilities and programs. To this end, the Preferred Alternative calls for shuttle buses and other facilities to be accessible for visitors with disabilities. Overnight lodging in the Valley would continue to be accessible via personal vehicles or by transit buses. Analysis of and planning for accessibility would be conducted throughout the implementation of the *Yosemite Valley Plan*. The Sequencing Plan schedule for the Preferred Alternative also stipulates that until transit vehicles and facilities are accessible, access for visitors with disabilities would continue essentially the same as now, by the use of personal vehicle placards for access to parking spaces at principal Valley destinations.



3.9.4 ~ Park Entrance Fees

Note: One response is provided for concerns #1070, #1071, and #1073, placed following #1071.

1070. Public Concern: The National Park Service should re-evaluate the entrance fee system at Yosemite National Park.

“Entering the park and being in the park should be free to US citizens. Public land is not owned by the government for its use. It is owned by the people for their uses. NPS needs more money? Tell it to the people instead of sticking it to us. As much as having different prices for park use as a tool for guiding park use sounds appealing, all fees are the government ripping the people off.” (Individual, Austin, TX - #6038)

“I think the Golden Age Passport, allowing free admission for people 62 and over should be done away with. Seniors who use our National Parks should pay an entrance fee. Maybe for 70 and over it could be half price.” (Individual, La Jolla, CA - #3034)

1071. Public Concern: The National Park Service should reduce entrance fees to Yosemite National Park.

“The \$20 entry fee is much too steep.” (Individual, San Jose, CA - #3101)

Response: This concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan*. Fee policy (amount of fees, through-park fees, etc.) for Yosemite National Park is set by National Park Service headquarters in Washington, D.C., in consultation with the Secretary of Interior, and in accordance with laws and direction from Congress. Yosemite National Park recognizes that fee policy could be considered and evaluated as an incentive to manage traffic and parking. Incentives would be explored in the planning of the traveler information and traffic management system, proposed in each of the action alternatives in the *Final Yosemite Valley Plan/SEIS*.

1072. Public Concern: The National Park Service should eliminate the Golden Age Pass for Yosemite National Park.

“I think the ‘Golden Age Passport’ allowing free admission for people 62 and over should be done away with. Seniors who use our National Parks should pay an entrance fee. Maybe for 70 and over it could be half price.” (Individual, La Jolla, CA - #3034)

Response: This concern is acknowledged; however it is outside the scope of the *Yosemite Valley Plan*. Free admission to federal areas for those over 62 is considered an appropriate allowance made for those who may be living on fixed incomes. There are no feasible means of determining income or ability-to-pay that the National Park Service could implement. Park entrance fees are determined by congressional action.

1073. Public Concern: The National Park Service should eliminate entrance fees to Yosemite National Park.

“Entering the park and being in the park should be free to US citizens. Public land is not owned by the government for its use. It is owned by the people for their uses. NPS needs more money? Tell it to the people instead of sticking it to us. As much as having different prices for park use as a tool for guiding park use sounds appealing, all fees are the government ripping the people off.” (Individual, Austin, TX - #6038)

Response: See response to concern # 1071.

3.9.5 ~ Orientation and Interpretation

1074. Public Concern: The National Park Service should expand interpretive and educational services in Yosemite National Park.

“Expansion of interpretive programs and promotion of increased visitor understanding and enjoyment of natural values should be essential goals.” (Individual, Monte Sereno, CA - #50)

“I would advance the idea of a stepped up interpretive services effort. One in which there is much increased park ranger contacts, more guided hikes and educational programs altogether. I see this as a means to increase visitor enjoyment, provide a greater sense of community, promote greater appreciation for the new direction taken by park management and to lessen adverse visitor impacts.” (Individual, Walnut Creek, CA - #195)

“I learned so much about the preservation and protection of the park on Ranger-led hikes, as well as a great deal about the trees, flowers, birds, and wildlife. . . After the briefing, I spoke with one of the presenters and expressed my concern about fewer ranger-led hikes and lectures. I was told that the reason was that 80% of the visitors come for one day only. . . I’m sure if people could find somewhere to camp there would be a much greater demand for ranger-led hikes.” (Individual, Portola Valley, CA - #873)

Response: The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* (as described in Vol. IA, Chapter 2, Visitor Experience—Orientation and Interpretation) proposes increases in interpretive and educational services and facilities, particularly to meet the increased and diverse needs of visitors touring by means other than a private vehicle.

1075. Public Concern: The National Park Service should use fee demonstration money to fund interpretive and educational programs and facilities.

“I do encourage the park to use some of the fee demonstration money to improve the visitor educational outreach and visitor centers.” (Individual, El Portal, CA - #1646)

Response: This concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan*. Congress and the Secretary of Interior have provided specific direction on what fee revenue can be used for (e.g., repairing facilities), and what it cannot be used for (e.g., permanent staff salaries). To implement the *Yosemite Valley Plan*, the National Park Service would use some of the Fee Demonstration money to rehabilitate facilities that support visitor education and enjoyment.

1076. Public Concern: The National Park Service should consider using volunteers to enforce park rules during the peak-season.

“Could volunteers or docents be trained to help at different locations at least during peak seasons? The reason for this is I have observed in the redwoods area of the park that says please stay on path but people walk inside the fences to get photos anyway. Another popular concept is campground hosts to help in campgrounds in exchange for a campsite during peak periods.” (Individual, Clovis, CA - #152)

Response: This concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan*. All park employees, including volunteers, are familiar with park rules and regulations. However, only a commissioned law enforcement ranger can enforce rules and regulations. The park does have an active volunteer program, including working as campground hosts and as interpreters (or docents).

1077. Public Concern: The National Park Service should emphasize the connections between people and their environment in Yosemite National Park.

“It is vital that consideration be given to experience process rather than a (visitor) experience based merely on recreation, geographic location and grand vistas. This process has much potential and in many ways to be wrapped



up into an educational framework which automatically lends respect for others, human and non-human. . . it is important that people be reconnected back to natural systems . . . a management plan should focus on directions that emphasize process as part of experience and education and not rely so much on immediate visual sights and recreational opportunities for the visitor. These rewards should only be by-products . . . A plan thus drafted may result in positive educational visitor experiences: vistas associated not with auto noise (a pollution that can be completely eliminated); temperatures associated with elevation, seasons or global climate change; landscape vistas associated with physical effort; modes of travel associated with organization/coordination for the greater good.” (Individual, Washington, DC - #281)

Response: A goal of the Yosemite Valley planning process has been to accommodate the diverse means through which visitors enjoy Yosemite Valley where those means do not degrade either resources or the experience of most other visitors. While some visitors simply wish to enjoy the grand scenery for which Yosemite was set aside as a national park, others take advantage of the opportunity to know the park more intimately. The expanded orientation, interpretation, and education programs proposed in the *Final Yosemite Valley Plan/SEIS* would be designed to meet this diversity of visitor desires, and would be designed to facilitate connections between visitors and Yosemite’s natural and cultural environment.

1078. Public Concern: The National Park Service should allow the Yosemite Institute to continue operating in the park.

“I ask you please, allow the Yosemite Institute to continue their work here. I spent a week in this park under the guidance of the institute with my class, I had the most memory packed week . . .” (Individual, Santa Rosa, CA -

Response: The National Park Service continues to support providing educational programs to children through the Yosemite Institute. The *Final Yosemite Valley Plan/SEIS* does not preclude Yosemite Institute from operating in the Valley. The Preferred Alternative calls for more economic and rustic lodging accommodations that may serve the needs of Yosemite Institute better.

1079. Public Concern: The National Park Service should reinstate the Firefall in Yosemite Valley.

“I have so many memories including the Firefalls. I’m positive that they cannot be reinstated, although I would love that. That was the main point of the week when we would watch the Firefalls. And if there were a way of reinstating them, it would be wonderful. These kids are missing out on a lot.” (Individual, Palo Alto, CA - #3100)

Response: This concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan*. It is unlikely that the firefall will ever again be offered as an attraction because of the damage that was done to park resources. The damage included forest impacts from the collection of massive amounts of red fir bark, heat damage to rock lichen, discoloration of the rock face, and meadow damage from trampling and parking by onlookers. Such synthetic attractions are no longer considered appropriate to the park or to the mission of the National Park Service. However, their memory may be important as part of what was done historically to promote a park experience, gain support of national parks, and as an example of past practices that have changed because their impacts are better understood.

3.9.6 ~ Recreation

3.9.6.a ~ General Management Direction

1080. Public Concern: The National Park Service should limit recreational activities within Yosemite National Park.

“Yosemite should be designated as an area for the enjoyment of the scenery, a wilderness experience and an escape from city life not as a recreational area. For those who want recreation, swimming, boating, etc., there are numerous areas for such, as lakes, rivers, the coast, etc.” (Individual, Roseville, CA - #5)

“Recreational and other visitor supplies shall meet criteria assuring respect for and non-degradational use of the corridor.” (Individual, Wimberley, TX - #16)

“The National Park Service's enabling legislation includes two purposes: to preserve Yosemite's unique natural resources and scenic beauty and to make these resources available to visitors for study, enjoyment and recreation. These purposes do not require that all sorts of recreation be permitted. Nor do the goals of the General Management Plan. It appears obvious that only recreational activity which is compatible with preservation of resources and scenic beauty should be permitted.” (Individual, Pioneer, CA - #23)

Response: The *Final Yosemite Valley Plan/SEIS* has been developed with the intent of maintaining opportunities for a diversity of resource-based visitor experiences and recreational activities in Yosemite Valley. Although actions are proposed that would affect recreational activities, the *Final Yosemite Valley Plan/SEIS* does not propose to eliminate any, except where actions proposed for other reasons substantially alter the availability of a particular recreational activity (e.g., the proposal to remove the concessioner stable would eliminate commercial trail rides in Yosemite Valley). However, in the future, management zoning and the results of the Visitor Experience and Resource Protection study proposed in the Preferred Alternative may lead to additional management of some recreational activities when necessary to protect resources or the quality of other visitor experiences. This zoning and the Visitor Experience and Resource Protection study are described in Vol. IA, Chapter 2, Actions Common to All Action Alternatives of the *Final Yosemite Valley Plan/SEIS*. (Also see response to concern #1061.)

3.9.6.b ~ Climbing

1081. Public Concern: The National Park Service should provide adequate access to climbing routes in Yosemite Valley.

“As a climber, the current lack of access to Arch Rock and the Cookie Cliff, two of the best climbing areas in the park is frustrating. Please restore access to these crags as soon as possible.” (Individual, CA - #6166)

Response: Access for climbing is described in the *Final Yosemite Valley Plan/SEIS* (Vol. IA, Chapter 2 Visitor Experience—Recreation). Access to Yosemite Valley would be the same as for other visitors, except that overnight parking would be provided for climbers with wilderness permits.

1082. Public Concern: The National Park Service should not allow rock climbing in Yosemite National Park.

“No more rock climbing . . . in the park. . . can be done elsewhere. All they do is cause damage to the rock facing, rock slides and a major distraction from the natural scenic beauty. Next we will have graffiti on the face of our mountains.” (Individual, Walnut Creek, CA - #264)

Response: Specific actions to manage rock climbing are outside the scope of this planning effort. Rock climbing and other forms of mountaineering are historical uses in Yosemite and other national parks.



When properly managed, the National Park Service believes these are important and valued forms of recreation that allow people to enjoy unique park environments.

3.9.6.c ~ Water Recreation

1083. Public Concern: The National Park Service should stock trout in the Merced River.

“How about planting fingerling brown trout, and rainbow trout. It might make-up for having to accept the ditch Yosemite creek runs in, and saving a few scenic bridges (if they can be altered to not affect the river). Trout are natural to Yosemite. Nobody keeps fingerling sized trout. The fishing pressure on the Merced is merciless! I fly cast, but for what?” (Individual, Los Angeles, CA - #135)

Response: This concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan*. Trout stocking in Yosemite Valley ended in 1978, after it was realized that introduced fish were having an adverse effect on native species and aquatic ecosystems. Non-native brown trout prey on and compete with the native rainbow trout, and introductions of rainbow trout from other areas have altered the native strain of this species. Fish planting also carries the risk of introducing diseases (e.g., “whirling” disease), which could decimate the Merced River fishery. The restoration of riparian and meadow areas, and the restoration of natural river hydrology in Yosemite Valley should provide great benefits to fish. A recent study found higher populations of rainbow trout in areas of the Merced River that are adjacent to restored riparian habitats. Such habitat improvement proposed under the *Final Yosemite Valley Plan/SEIS* is expected to provide a high-quality fishery in Yosemite Valley for truly wild trout. Fisheries management issues are addressed in the 1993 *Resources Management Plan*.

3.9.6.d ~ Trail Uses

1084. Public Concern: The National Park Service should prohibit stock use in Yosemite National Park.

“In view of the undesirable impacts of stock use in the park, it should be phased out, and not included in the acceptable uses listed in any of the five alternatives. The benefits that horse riding as an activity confers on a small minority of Yosemite visitors do not justify its deleterious effects on the majority. Dispensations can be made in cases of physical disability and advanced age.” (Individual, Watsonville, CA - #6041)

Response: The Preferred Alternative removes the stable operations and guided trail rides from Yosemite Valley. It has been recognized that extensive stock use on trails in Yosemite Valley has impacts on resources and on the quality of experiences of other visitors that outweigh the benefits enjoyed by the relatively few people who participate in those guided rides. The stable operation in Yosemite Valley has also had impacts on the highly valued resource area intended for restoration in the *Final Yosemite Valley Plan/SEIS*. Provisions may still be made for use of stock for those with disabilities, as part of overall accessibility planning proposed in this plan. Use of stock in the Valley is at a very low level at present, and continued use would be allowed in all but Alternative 3, subject to findings of the Visitor Experience and Resource Protection program outlined in Vol. IA, Chapter 2, Actions Common to All Alternatives—Visitor Use in Yosemite Valley. Horse use in Yosemite National Park is recognized as a historical and popular activity. It is only within the narrow confines of Yosemite Valley that horse use is being addressed in this plan.

(Also see response provided for concern statement #23.)

1085. Public Concern: The National Park Service should maintain hiking trails in Yosemite Valley.

“I have been visiting the Yosemite Valley for a week through the Yosemite Institute. When we were hiking around, we noticed that there were many rocks in trails. Therefore, the trails were closed. I think you should move these rocks out of the way.” (Individual, CA - #1695)

WILDERNESS TRAILS

“Maintain trails in wilderness areas.” (Individual, Red Bluff, CA - #34)

Response: Maintenance of trails is an operational issue outside the scope of this planning effort. The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* would provide for both improved and additional trails in Yosemite Valley; and some trails would be realigned to complement site designs for some areas. A discussion of trail locations is found in Vol. IA, Chapter 2 (Visitor Experience—Recreation).

3.9.6.e Other Recreation

1086. Public Concern: The National Park Service should increase and improve picnic facilities in Yosemite Valley.

“To encourage short term and day use we believe that picnic areas need to be improved and increased. A portion of the abandoned River Campgrounds furthest from the River could be developed as a day use picnic area. This might allow other picnic areas within the floodplain to be abandoned. There should be a net increase in picnic sites to encourage day use. We believe that picnic areas near Wawona should be greatly enhanced and moved further from the River. The picnic facilities are particularly inadequate and intrusive. Again, these facilities should be improved to encourage short-term use. Those near the Pioneer Village are in a very unattractive (and smelly) location.” (Individual, Stockton, CA - #331)

“Two new picnic areas could be established. One would be located in the Upper River Campground, so as to be immediately accessible from the new proposed day use parking lot in the Lower River Campground. Portable toilets and picnic tables could be temporarily placed during the peak summer season, and then removed during the winter. The other location would be in the Curry Orchard area which would be blocked off from any vehicular use. Again, portable toilets and picnic tables could be brought in during the summer peak months and removed during the winter.” (Individual, American Canyon, CA - #3126)

Response: A new picnic area is proposed near the day-visitor parking and transit facility in the Preferred Alternative, and another new picnic area would be available at the base of El Capitan (see Vol. IA, Chapter 2, Visitor Experience—Recreation). In the Preferred Alternative, the present Swinging Bridge and Church Bowl Picnic Areas would be removed in order to restore these areas to natural conditions. Additionally, the use of private automobiles would be eliminated from the Sentinel, Cathedral, and present El Capitan Picnic Areas to reduce the amount of vehicle traffic in the Valley; shuttle bus service would be extended to serve two of these facilities. Informal picnicking would likely become more attractive in areas where motor vehicles were eliminated from Northside Drive (such as the former Upper River and Lower River Campgrounds area and west of Yosemite Lodge). The Upper and Lower River Campground area was not considered to be used for formal picnicking, as the area would be restored to natural conditions.

1087. Public Concern: The National Park Service should not permit hang gliding in Yosemite Valley.

“I see no need to permit hang gliding in the Valley. Yes, the hang gliders would be thrilled and many people would watch them but another non-related activity, in terms of enjoying the total magnificence of the area is not needed. . .



Is there not an area outside of the crowded Valley that would provide good take-off and landing spots that would not add to the environmental concerns and people management problems in Yosemite Valley.” (Individual, Menlo Park, CA - #262)

Response: The *Final Yosemite Valley Plan/SEIS* has been developed with the intent of maintaining opportunities for a diversity of resource-based visitor experiences and recreational activities in Yosemite Valley. Although actions are proposed that would affect recreational activities, the *Final Yosemite Valley Plan/SEIS* does not propose to eliminate any, except where actions proposed for other reasons substantially alter the availability of a particular recreational activity (e.g., the proposal to remove the concessioner stable would eliminate commercial trail rides in Yosemite Valley). However, in the future, management zoning and the results of the Visitor Experience and Resource Protection study proposed in the Preferred Alternative may lead to additional management of some recreational activities when necessary to protect resources or the quality of other visitor experiences. This zoning and the Visitor Experience and Resource Protection study are described in Vol. IA, Chapter 2, Actions Common to All Action Alternatives of the *Final Yosemite Valley Plan/SEIS*.
(Also see response to concern #1061.)

1088. Public Concern: The National Park Service should not allow parachute jumping in Yosemite National Park.

“No more . . . parachute jumping . . . in the park. . . can be done elsewhere. All they do is cause damage to the rock facing, rock slides and a major distraction from the natural scenic beauty. Next we will have graffiti on the face of our mountains.” (Individual, Walnut Creek, CA - #264)

Response: This concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan*. Parachute jumping is prohibited within Yosemite National Park.

1089. Public Concern: The National Park Service should remove the Wawona golf course.

“Yosemite should be regarded as a National Park Treasure – not as an amusement park for golfers. Eliminate the golf course near Wawona. California has more than enough golf courses – and playing golf is not a reason to be in this wonderful National Park!” (Individual, Pacific Grove, CA - #66)

Response: This concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan*. The Wawona Golf Course, opened in 1918, is the oldest in the Sierra and part of the historic tourism culture of Yosemite National Park.

1090. Public Concern: The National Park Service should not remove or modify the Wawona golf course.

“Don’t touch the golf course or hotel...” (Individual, Felton, CA - #206)

Response: This concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan*. (Also see response to concern # 1089.)

1091. Public Concern: The National Park Service should reassess current management practices for the Wawona golf course.

“Is Wawona golf course locked into the National Heritage designation? At the presently small amount of recreational use, the 82 years old golf course should have a more natural management. Camping, picnic, etc.” (Individual, Orinda, CA - #3127)

Response: See comment #1089.

1092. Public Concern: The National Park Service should restrict irrigation of the Wawona golf course.

“Water for the Wawona Golf Course should not come at the expense of this protected habitat, and deliveries of this water should be halted immediately. Golf courses lower the water table, add fertilizers and pesticides to the watershed, and unnaturally alter the landscape. Golf courses do not have a role in or adjacent to National Parks and Wild and Scenic River corridors.” (Individual, CA - #6166)

Response: The specific purpose of the *Yosemite Valley Plan* is to provide direction and guidance on how best to manage visitor use, development of lands and facilities, and resource protection within Yosemite Valley and other park areas. As a result, the *Yosemite Valley Plan* provides general direction and guidance for future management decisions.

Reclaimed water from the Wawona Wastewater Treatment Plant and, on occasion, river water is used for irrigating the Wawona Golf Course. The application of the reclaimed water is strictly regulated and in compliance with the California Regional Water Quality Control Board through a National Pollutant Discharge and Elimination System permit. The permit regulates how the water is applied, time of day it can be applied, and in general terms, how much can be applied. Water can be taken from the river to supplement the reclaimed water when there is sufficient flow that withdrawals would not adversely impact resources.

Section 3.10 ~ Visitor Services

3.10.1 ~ Physical Development

1093. Public Concern: The National Park Service should manage heavily used portions of the park explicitly for visitor activities.

“Manage the east end of Yosemite Valley as an urban park, which it has almost been for about the last 75 years. This will affect only a very small percentage of the length of the Merced River. . . This is a small concession to make to allow for public enjoyment by the majority of park visitors. These areas should be under the current levels of management and conservation such as riverbank protection, boardwalks, revegetation and fencing. I would suggest similar management to be followed in the Wawona area from Pioneer village through the Wawona campground, the little Yosemite Valley campground area, the Merced Lake camp areas and the trails from Happy Isles to the tops of Vernal and Nevada falls.” (Individual, Terrance, CA - #224)

Response: The *Merced River Plan* zones several areas that are currently heavily used for continued intensive visitor use (see Vol. II, Appendix B, and Vol. IC, plates F-1, F-2, F-3). For example, there are significant areas of 2C Day Use zoning as well as camping and lodging zones (3A & 3B) in the Yosemite Valley and Wawona. However, the river plan also protects sensitive resources such as meadows and wetlands with more restrictive zoning (e.g., 2B Discovery). The National Park Service recognizes that visitor accommodations may best be situated in previously impacted areas, rather than moving them to areas that have no existing development. However both the *Merced River Plan* and the Preferred Alternative in the *Yosemite Valley Plan/SEIS* recognize that there are areas of critical importance to natural, cultural, and historical preservation (many of which need to be restored) that exist within those previously developed areas.

With the mission of the National Park Service being to provide for visitor accommodation, experience, and education within the context of its preservation objective, even those areas in which visitor accommodations are provided should evidence a concern for natural processes and objects of cultural and historical significance. Although eastern Yosemite Valley would exhibit some urban characteristics (e.g., higher densities of people, transportation systems), those should exist within a landscape that still allows



natural processes to prevail and emphasizes quality visitor experiences and understanding of those processes as well as historical and cultural legacies.
(Also see the response to concern #204.)

1094. Public Concern: The National Park Service should remove all unnecessary facilities from Yosemite Valley.

“I have a rather radical perspective of what should happen in Yosemite. I take the position that Yosemite historically has had concessions almost since its first explorations. I believe that all facilities should be removed from the valley except for restrooms, shuttle transfers, and a world class visitor center. Without concessions, there is no need for parking lots, lodging, food facilities or housing. No concession employees, only NPS employees to educate, protect, and work on resource issues. No campgrounds or amphitheaters, no bikes, rafts or horses. Visitors would come in on buses and lodge in the gateway communities. There would be hiking but no tours. Like Canyon de Chelly, the visitor experience would be very different than it is currently. I think the perspective would be one of a sacred destination. Haul out the asphalt, pull up the wiring, and truck out the building materials and restore the ecological processes in their entirety.” (Individual, El Portal, CA - #1646)

Response: The National Park Service has evaluated all Valley structures as part of this planning process. Individual structures were evaluated based on the following criteria:

Does the function need to be located in the Valley?

What is the location with respect to highly valued resources?

What is the location with respect to the River Protection Overlay?

What is the proximity to the 100-year floodplain?

What is the proximity to mapped geologic hazards?

The removal and/or retention of structures was determined after full review of these criteria.

1095. Public Concern: The National Park Service should not allow the construction of any new facilities in Yosemite Valley.

“No other new lodging in the Valley.... No new food/ dining areas....” (Individual, Folsom, CA - #3150)

Response: See response to concern #1094.

1096. Public Concern: The National Park Service should construct visitor services facilities near the eastern boundary of Yosemite National Park.

“New development of services and accommodations must be encouraged and, where possible, located to the eastern side of the park toward Lee Vining and to the south. This area along the desert floor is below the elevation of the park and is also downwind. Remember how irreparable smog accumulation has become in Altadena-Pasadena, Lake Tahoe and also Berkeley-Oakland.” (Individual, Walnut Creek, CA - #264)

would be allowed. I would like to see a definition or better description of what are meant by ‘facilities.’”
(Individual, Snelling, CA - #946)

Response: Planning for visitor accommodations along the Tioga Road near the park’s eastern boundary or beyond the park boundary is outside the scope of this planning effort. The 1980 *General Management Plan* originally established the location and number of lodging units for Yosemite National Park and the 1992 *Concession Services Plan* further defined them. The Preferred Alternative of the *Final Yosemite Valley Plan/SEIS* calls for expanding or locating visitor centers near each park entrance in order to reduce

the dependence on the Yosemite Valley Visitor Center as the principal park information center. The center for visitors arriving from the east side could potentially be located in a jointly operated facility outside the park.

1097. Public Concern: The National Park Service should locate a new visitor center in Yosemite Village.

“I wholeheartedly support the redevelopment of the current Yosemite Village to include a new Visitor Center.” (Individual, Yosemite National Park, CA - #1632)

Response: The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* proposes a new visitor center in the Yosemite Village to serve the large number of visitors in Yosemite Valley each day. Visitor centers serve both orientation and educational needs necessary to provide a safe and enjoyable visit and to assist in the protection of park resources.

(Also see response to concern #110 for a discussion of entrance station visitor centers.)

1098. Public Concern: The National Park Service should construct flood-proof buildings in Yosemite Valley.

“I now work for the corps of engineers. One of the techniques to deal with flood plains that I think is a little under rated in this plan, and hopefully you’ll incorporate this idea into the Valley Implementation Plan, is this flood-proofing buildings. It’s nice to stay out of floodplains, but considering your squeeze between a rock fall zone and the river, there may be some better land-use sites in the floodplain. So by either raising buildings or building them out of, you know, more flood-proof materials can allow a lot more flexibility for design.” (Individual, Sacramento, CA - #3145)

Response: Yosemite National Park currently operates under Executive Order 11988, Floodplain Management, and the NPS *Floodplain Management Guideline* (1993) which provide guidance for the minimization of hazard to life and property and protection of natural floodplain values in the National Park System. One of the goals of the 1980 *General Management Plan* is to allow natural processes, such as flooding, to prevail in the park. In addition, an active flood regime is a component of the hydrologic process Outstandingly Remarkable Value of the Merced Wild and Scenic River within Yosemite Valley.

In accordance with the Executive Order, National Park Service guidelines, the *General Management Plan*, and the *Merced River Plan/FEIS*, the *Final Yosemite Valley Plan/SEIS* proposes the removal of a number of facilities from the 100-year floodplain of the Merced River in Yosemite Valley to reduce hazards to life and property and to restore floodplain values. Existing facilities within the floodplain could be flood-proofed to reduce hazard to life and property, but the adverse impacts of the structures to floodplain values would continue.

The El Portal Administrative Site was established by Congress in 1958 (P.L. 85-922). The act specifically set aside the administrative site for operational and administrative purposes, and stated that the site would “not become part of Yosemite National Park, nor be subject to the same laws and regulations governing said park.” As a result, there are fewer floodplain development constraints at El Portal.

Existing facilities in Yosemite Valley, El Portal, and Wawona that are within the 100-year floodplain of the Merced River are listed in the Floodplains Affected Environment section (Vol. IA, Chapter 3) of this document. NPS *Floodplain Management Guideline* and Executive Order 11988 apply to these developments. A floodplain assessment, known as a statement of finding, has been prepared by the National Park Service Water Resources Division and is included in Vol. II, Appendix N.



1099. Public Concern: The National Park Service should not winterize the Happy Isles Nature Center.

“The idea of winterizing the nature center, apparently with the idea that winter visitors to the Valley would be so interested in the nature center, they would walk and sloshing through the snow just to get there, however, is unrealistic. In reality, the majority of winter visitors are more interested in winter/snow activities. As there are other nature center areas that are probably more easily accessible in the winter than Happy Isles, this winterizing plan would appear to be less than cost effective, and therefore should be omitted.” (Individual, American Canyon, CA - #3126)

Response: The non-peak season months see the highest visitation to Yosemite National Park by educational groups, and there is already a demand for use of the Nature Center during the winter by these groups. In the winter, particularly during inclement weather, educational groups seek interpretive opportunities indoors, in addition to outdoor activities. Yosemite National Park’s draft *Long-Range Interpretive Plan* proposes expanding use of the Nature Center at Happy Isles by children with adult facilitators, and anticipates training educators to use the Nature Center’s resources in the winter without the need for additional park staff, and/or expanding partnerships for the building’s operation. Because the road to the Nature Center is routinely cleared of snow for access to nearby utility facilities, winter conditions would have a minimal effect on its use.

1100. Public Concern: The National Park Service should maintain current management practices for Wawona visitor facilities.

“The proper selection for the Wawona Campground is Alternative 1: the No Action Alternative. It is important that while we are saving the river for future generations, we still continue to enjoy it now. After much more than one hundred years of sensible use the river is as clean and beautiful as it always has been. In short, the Park Service has, through its careful management, kept Wawona campground a natural experience. In addition, the entire Wawona area including the Pioneer History Center, the Wawona Hotel, and the beautiful Wawona Golf Course should also be treated with Alternative 1: the No Action Alternative. The Wawona area around the South Fork of the Merced River has changed very little over the years, but it still remains one of the nicest places on earth. It has just the right mix of tourist support and does not impact the river in any way adversely.” (Fresno County Home Rule Advisory Committee, Fresno, CA - #6374)

Response: Although the Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* proposes locating employee housing in Wawona, if alternative locations cannot be found outside of Yosemite National Park, this would be in an area presently receiving only minimal visitation. The retention, removal, or location of other facilities within Wawona is outside the scope of this planning effort.

3.10.2 ~ Camping

3.10.2.a Number of Campsites and Location

1101. The National Park Service should not remove campgrounds from Yosemite National Park.

“I wouldn’t want to see the campgrounds eliminated or become a first come first serve basis. Our annual family camp out is something that my parents were brought up doing and is something that I in turn would like to share with my children in the future. Keep the campgrounds and restore the lost ones is what I think a lot of people would like to see happen. The fight for an operator to make your summer reservation is tough, especially with the elimination of 2 and a partial campground. If it’s tough now, think of how bad it will be if the park is reduced in reserved camp grounds.” (Individual, No Address - #10)

“In the discussion of Little Yosemite and Merced Lake areas, you’ve mentioned (gently) possible changes in use of the Merced Lake camp, and elsewhere you mention possible removal of the entire string of High Camps. I’ve used

them to introduce many young and middle-aged persons to the joys of the non-Valley park and believe at least some camps should be retained as part of that educational experience.” (Individual, San Francisco, CA - #45)

HIGH SIERRA CAMPS

“People who want to go into the wilderness but who are too old, too infirm, or too young have very few options across the nation, and the High Sierra Camps are one of the best of those limited options. Backpackers rearing small children can use the Camps to get a curative dose of wilderness that their families might otherwise preclude. The High Sierra Camps represent only four roadless locations within a wilderness almost as large as a small Eastern state. There are plenty of pristine places for backpackers like myself to go, but there are so very few wilderness places for the infirm to go. We should not shut them down to suit ourselves.” (Individual, Oberlin, OH - #6039)

WAWONA CAMPGROUND

“The Wawona campground should stay right where it is.” (Individual, Ridgecrest, CA - #1707)

Response: The number of campsites in Yosemite Valley has been a major concern throughout this planning process, as the National Park Service is challenged to determine an "adequate" number of campsites. Within the narrow Valley, visitor accommodations cannot be provided merely on the basis of visitor demand, but must be located and designed in consideration of safety constraints (floodplain and rockfall) and, particularly, of highly valued resources (see Vol. IA, Chapter 2, Developing a Range of Alternatives—Development Considerations, and Resource Stewardship—Highly Valued Resources, in the *Final Yosemite Valley Plan/SEIS*). The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* has identified those highly valued resource areas and proposes locating visitor accommodations outside of these areas as much as possible. Those areas in Yosemite Valley suitable for visitor accommodations are few, and within that small space, the Preferred Alternative proposes a variety of overnight accommodations, including various camping options and lodging accommodations ranging from rustic to deluxe. The greatest number of these accommodations is at the lower end of the cost spectrum.

Campgrounds outside of Yosemite Valley are outside the scope of this planning effort. The 1980 *General Management Plan* identifies camping as an appropriate resource-based activity and commits to providing a wide range of camping opportunities throughout the park, while relocating some campsites to zones more suitable for this type of development. Meeting the other goals of the *General Management Plan*, particularly that of protecting sensitive resources, has led to reductions of the number of campsites prescribed by the *General Management Plan* for Yosemite Valley. Wilderness camping is managed by the park's *Wilderness Management Plan*, which currently provides for the retention of all existing wilderness campsites.

(Also see response to concern #13.)

1102. Public Concern: The National Park Service should not reduce the number of campsites from Yosemite National Park.

“In the Valley, the GMP calls for removing 116 campground units adjacent to the Merced River, and retaining 684 drive-in campsites . . . However, based on the 1997 flood results, the Park Service removed all of the upper and lower river campgrounds. The public announcement that followed this action was that the campsites would be relocated in the Valley to higher ground on a one-for-one basis. In the Merced River Plan, the Park Service proposes to remove additional campsites from the river corridor. This is a modification to the General Management Plan. . . Campgrounds can withstand flooding with no permanent damage. During heavy rainfalls or snowmelt, campgrounds can be, and have been, vacated easily within an hour or less, with no loss of life. Therefore, these campsites should be replaced in the Valley to meet the requirements of the GMP.” (Individual, Malibu, CA - #6079)

Response: The *Merced River Plan* concluded that facilities in river-related habitat, particularly those within 150 feet of the bed and banks of the river, were impediments to the natural processes and highly valued resources that contribute so greatly to the value of the river and Yosemite Valley. (See Vol. IA,



Chapter 2, Developing a Range of Alternatives, and Chapter 3, Merced Wild and Scenic River.) Thus, many of these areas were protected from facility development by zoning and the River Protection Overlay. While reducing the amount of acreage available for campsite placement and the potential number of campsites in Yosemite Valley, the *Merced River Plan* and the Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* have set in place steps to restore to natural conditions important areas and systems adjacent to the Merced River for the benefit of all visitors, today and in the future. An analysis of other locations suitable for camping facilities was also conducted, and some campsites have been relocated to these areas.

(Also see the response to concerns #13 and 1101.)

1103. Public Concern: The National Park Service should eliminate camping within Yosemite Valley.

“Camping should be eliminated in the valley. We enjoyed camping there years ago and gave it up over 40 years ago as it was no longer an enjoyable experience with tent ropes crossing each other, dust and noise.” (Individual, Petaluma, CA - #139)

Response: The 1980 *General Management Plan* identifies camping as an appropriate resource-based activity and commits to providing a wide range of camping opportunities parkwide, while relocating some campsites to zones more suitable for this type of development. Meeting the other goals of the *General Management Plan*, particularly protecting sensitive resources, has led to reductions in the *Final Yosemite Valley Plan/SEIS* from the number of campsites prescribed by the *General Management Plan* for Yosemite Valley.

1104. Public Concern: The National Park Service should not develop the Camp 4 (Sunnyside Campground) area.

“The area known as Sunnyside/Camp 4 should be protected from any future development or destruction. This area is of great importance to rock climbers around the world.” (Individual, No Address - #6035)

Response: In the Preferred Alternative, the National Park Service would retain and preserve the core of the Camp 4 (Sunnyside Campground) Historic Site. Five existing campsites would be relocated from the west end of Camp 4 in order to provide a buffer for the new Indian Cultural Center. These five campsites, as well as 28 additional new campsites, would be placed in the location of the former service station and adjacent to the east end of Camp 4. In this way, the National Park Service would continue and expand the use of Camp 4.

1105. Public Concern: The National Park Service should develop the Camp 4 (Sunnyside Campground) area.

“My strong wish is to have the 4-plexes, as previously planned recently, proceed to be built – precisely around the Sunny Side Campground areas.” (Individual, San Diego, CA - #3038)

Response: The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* calls for an addition of 28 campsites (for a total of 65) at Camp 4 (Sunnyside Campground). No employee housing is called for at Yosemite Lodge in the Preferred Alternative; six additional visitor lodging units would be placed at Yosemite Lodge. Because of impacts of the January 1997 flood and other resource preservation actions called for in the Preferred Alternative of the *Final Yosemite Valley Plan/SEIS*, the percentage decrease in campsites has, and would be, larger than that of lodging. Use of this currently undeveloped area for campsites rather than lodging would help mitigate this greater loss of campsites.

3.10.2.b Campground Type and Design

1106. Public Concern: The National Park Service should provide recreational vehicle access to all drive-in campgrounds in Yosemite National Park.

“I urge that RV hookups not be provided, because I believe this would merely exacerbate the high level of demand for access to the Valley. Also, it is expensive. However, RVs should be permitted in all campgrounds (except Camp 4), and treated on an even basis with tent campers. Each site should be reasonably accessible to RVs of, say, 25’ length, but should also be accessible for tents.” (Individual, Woodland, CA - #2)

Response: In order to accommodate the greatest number of campsites in the acreage available for campgrounds, consolidation of similar types of camping is necessary (i.e., walk-in sites with adjacent parking, walk-to sites with no parking, and automobile and recreational vehicle camp sites). While the *Final Yosemite Valley Plan/SEIS* Preferred Alternative provides for this mix of camping experiences, the final variety of automobile and recreation vehicle campsites would be determined during the design phase for each campground.

1107. Public Concern: The National Park Service should reassess vehicle size limits for Yosemite National Park campsites.

“I have a 22 ft 5th wheeler and my rig will fit in a lot more spaces than whoever measured the sites and decided that my 5th wheeler was too big for the site. Someone needs to remeasure the sites and allow at least a little larger trailers and 5th wheelers to use more of the sites.” (Individual, No Address - #6094)

Response: This concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan*. As campgrounds are redesigned or built vehicle size will be determined by standards covering space-on-site, room for manipulation during entry and exit, and possible driver error to prevent damage to either the vehicle or the site.

1108. Public Concern: The National Park Service should limit the size of recreational vehicles allowed in Yosemite National Park campgrounds.

“I am happy to see the types of campsites segregated. I would hope that the number of cars per campsite will be limited. Also, I think that there should be a limit on the size of RV’s permitted in a site. I don’t think we can afford to pave the area needed for those big drive-through vehicles, in terms of space, water runoff and soil compaction.” (Individual, Menlo Park, CA - #262)

Response: Vehicle size restrictions are based on safety and road characteristics and these restrictions would be placed on all vehicles, not any selected grouping. This is an operational issue and is not within the scope of the *Yosemite Valley Plan*.

1109. Public Concern: The National Park Service should provide separate camping facilities for recreational vehicles.

“Put motor homes in big parking lots together. They are allowed to run their generators all at one time at least two times a day. Put them near bike rentals and a store or restaurant, like Camp Curry.” (Individual, Los Angeles, CA - #968)

Response: In order to accommodate the greatest number of campsites in the acreage available for campgrounds, consolidation of similar types of camping is necessary (i.e., walk-in sites with adjacent parking, walk-to sites with no parking, and automobile and recreational vehicle camp sites). While the *Final Yosemite Valley Plan/SEIS* Preferred Alternative provides for this mix of camping experiences, the final mix of automobile and recreation vehicle campsites would be determined during the design phase for each campground.



1110. Public Concern: The National Park Service should improve campground amenities in Yosemite National Park.

“More water spigots along campsites, like it was in the 50’s and 60’s. Campers don’t have to hurt themselves carrying big igloos. Maybe add electricity to every campsite for safety.” (Individual, Los Angeles, CA - #968)

“Camping in Yosemite has been very primitive. There is never enough work to improve the facilities. Many places you camp in the United States have water access to your camp spots; they have sewer access to your camp spots. We’re not asking for beautiful facilities, but we feel over the years that a lot of these places should have been improved. There used to be water spigots through the campgrounds.” (Individual, San Mateo, CA - #3090)

Response: The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* proposes to improve camping in several ways (see Vol. IA, Chapter 2, Visitor Services—Camping): different camping modes (e.g., RV campers, car campers, and backpackers) would be separated to a larger extent than they are now. Some of the sites may have electrical hookups added to them to reduce the use of gas-powered generators, and showers may be added at some campgrounds. Consideration of specific amenity, hook-up, and other design details would take place in site-specific planning for each campground.

3.10.3 ~ Lodging

1111. Public Concern: The National Park Service should maintain the current number of lodging units in Yosemite Valley.

“The Draft VIP calls for the reduction of housekeeping lodging units in order to improve/restore the natural beauty of the river banks. This improvement can be done within reason without reducing lodging units.” (Individual, American Canyon, CA - #3126)

Response: With increasingly available regional transportation and the development of recreation, lodging, and camping facilities in gateway communities, a majority of visitors are no longer dependent on overnight accommodations within Yosemite Valley during their visit to Yosemite National Park. Nonetheless, the National Park Service recognizes that there is great value in being able to experience the Valley in the evening, night, and early morning, and overnight accommodations facilitate this special experience for park visitors. Determining the appropriate amount and types of overnight accommodations to provide a quality visitor experience remains a challenging issue.

Target numbers of lodging units were established through a public process in the 1980 *General Management Plan*. This number was further refined in the 1992 *Concession Services Plan*. The *Final Yosemite Valley Plan/SEIS* also proposes to vary the number of lodging units in an effort to improve the quality of visitor experiences while protecting and preserving resources for future generations. Decisions on the number and type of visitor accommodations must be based on resource and site conditions. These conditions include floodplains and geological hazard areas (see Vol. IA, Chapter 2, Developing a Range of Alternatives—Development Considerations), as well as the quality of the overnight experience and how closely it relates to the park and the immediate environment.

The National Park Service acknowledges that Housekeeping Camp provides economically priced accommodations and a unique opportunity and overnight experience in Yosemite Valley. In response to public comment, the number of Housekeeping Camp units proposed in the Preferred Alternative of the *Final Yosemite Valley Plan/SEIS* has been increased from the *Draft Yosemite Valley Plan/SEIS*. Given the implementation of the River Protection Overlay established by the *Merced River Plan/FEIS*, the total number of units would be 100. Locating Housekeeping units in other areas of the Valley was considered. But given the constraints on developable land and corresponding reductions in other facilities that would have to take place, the numbers of overnight accommodations (camping and lodging) proposed in the Preferred Alternative is felt to be an appropriate mix of overnight experiences.

1112. Public Concern: The National Park Service should provide affordable lodging in Yosemite Valley.

“Let’s have housing for students – housing for college students. People cannot afford these 175-dollar rooms. In the 1973 we started a plan in our school district where we took eighth grade students to Yosemite National Park. We’ve been doing that for 27 years, and we started out with paying just 67 dollars per person. Now we have to have almost 497 dollars just to go and take one student for one week up there. . . Let’s have housing for the people who need to be informed and have interpretation for the Park. That’s the main reason for having Yosemite National Park is to have interpretation for students and for people who want to hear it.” (Individual, Palo Alto, CA - #3088)

“When you do build new accommodation please think of the elementary, Jr. High, high school, college students and young parents with children. Keep the price under \$100.00 per night per cabin.” (Individual, Cupertino, CA - #146)

Response: The *Final Yosemite Valley Plan/SEIS* has been amended in response to concerns that new lodgings would not provide quality, resource-related experiences and that mostly low-priced accommodations were being affected. The National Park Service is concerned about equitable access to Yosemite Valley and its facilities, programs, and attractions. The accommodations reservation systems do not discriminate on the basis of economic status, race, gender, religion, profession, culture, or sexual orientation, so each person has the same opportunity to secure lodging or camping facilities. The actions proposed in the *Draft Yosemite Valley Plan/SEIS* that reduce facilities in Yosemite Valley did call for the bulk of the reductions to come in the categories of camping and rustic level accommodations. The facilities most affected were those in the rockfall zones and the highly valued resource areas (see Vol. IA, Chapter 2, Developing a Range of Alternatives). The challenge has been to locate an appropriate mix of facilities in those few areas that are suited to development. In the Preferred Alternative, and compared with the *Draft Yosemite Valley Plan/SEIS*, campsites have been increased by about 8%, rustic accommodations by 35%, and economy level accommodations by 12%. In the Preferred Alternative, 81% of all overnight accommodations (camping and lodging) in the Valley would be priced at the economy level or below (compared to 78% of existing accommodations); 53% would be priced at the rustic level or below. The mix of accommodations proposed maintains a range of overnight opportunities, from camping to rustic Housekeeping units to economy, mid-range, and deluxe lodging facilities. The Preferred Alternative of the *Final Yosemite Valley Plan/SEIS* would establish several new campgrounds and the lodging facilities developed would emphasize connection to park resources, economy level cost, and year-round function. Overall, and outside the scope of the *Yosemite Valley Plan*, the National Park Service is developing strategies for reaching and serving a more diverse constituency, particularly through the efforts of interpretive outreach services already underway (including a partnership with the University of California, Merced campus).

(Also see response to concerns # 21, # 70, # 73, and # 117.)

1113. Public Concern: The National Park Service should maintain Housekeeping Camp in Yosemite National Park.

“We object to the characterization (under the evaluation of Local Economy) of the Housekeeping Camp as a valuable resource primarily for its benefit to low-income visitors. We feel that the Housekeeping Camp is valuable to a wide range of visitors irrespective of income levels. This facility provides a unique ability to accommodate multi-generational families, some of who are elderly or handicapped and no longer able to tent-camp. It also allows for an appreciation of the park environment that is not provided by any other not-tent facilities in the Valley. While we understand that some units may be incompatible with protection of the river, we strongly encourage the retention of as many units as possible.” (Individual, Pasadena, CA - #6063)

Response: The National Park Service acknowledges that Housekeeping Camp provides economically priced accommodations and a unique opportunity and overnight experience in Yosemite Valley. In response to public comment, the number of Housekeeping Camp units proposed in the Preferred Alternative has been increased from the *Draft Yosemite Valley Plan/SEIS*. Given the implementation of the River Protection Overlay established by the *Merced River Plan*, the total number of units would be



100. Locating Housekeeping units in other areas of the Valley was considered. But given constraints on developable land and corresponding reductions in other facilities that would have to take place, the numbers of overnight accommodations (camping and lodging) proposed in the Preferred Alternative, is felt to be an appropriate mix of overnight experiences.

(Also see response to concerns # 21 and # 339.)

1114. Public Concern: The National Park Service should rebuild the Yosemite Lodge cabins.

“I am especially concerned that Yosemite Lodge be returned to its configuration in the years immediately prior to the January, 1997, flood. The removal of the cabins caused a great loss to the visitors who like to stay for a week in the park in one of the wonderful cabins at the lodge, which were affordable to middle class families and senior citizens. . . Not only is it now difficult to obtain accommodations at the lodge, but visitors can no longer experience the rustic ambiance associated with the Yosemite Lodge cabins.” (Individual, Whittier, CA - #56)

Response: In response to public comments regarding both economically priced accommodations and the desire for a cabin experience at Yosemite Lodge, the proposed number of economy priced rooms at Yosemite Lodge has been increased in the Preferred Alternative from 90 units in the *Draft Yosemite Valley Plan/SEIS* to 117 units in the *Final Yosemite Valley Plan/SEIS*. New cabin units would be built.

(Also see response to concerns # 21, # 83, and #144.)

1115. Public Concern: The National Park Service should eliminate plans for additional lodging facilities in El Portal.

“All the new hotels that are slated to go into the El Portal area, those should be nixed. There is no reason why we need more hotels and more places for people to stay there.” (Individual, Yosemite Valley, CA - #3226)

Response: While the Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* calls for the relocation of employee housing from Yosemite Valley to El Portal, it does not propose locating lodging there. Existing lodging in El Portal is located on private property.

1116. Public Concern: The National Park Service should pursue conversion of Trailer Village into community open space.

“Of particular interest is the concept of converting the Trailer Village/Abbieville into community open space Developed Zone 3C in Alternative 5. Such a development would significantly mitigate the heavy use the Forest is currently experiencing on the limited facilities we have been able to develop along Incline Road. Please consider adopting the management zone designations in Alternatives 4 or 5 for Segment 4 in your final plan.” (Sierra National Forest, Clovis, CA - #M-1598)

Response: This alternative was dismissed because it is inconsistent with the goals and objectives of the *Yosemite Valley Plan* to reduce building and facility related congestion in Yosemite Valley. Moreover, it would be inconsistent with the intent of the 1958 Act which established El Portal as an administrative site to support park operations and administration. See also Vol. IA, Chapter 2, Alternatives Considered But Dismissed

Section 3.11 ~ Transportation

3.11.1 ~ Roads

1117. Public Concern: The National Park Service should reconsider improving roads to facilitate faster travel through the Park.

“There is discussion of improving roads to improve safety and facilitate movement. I’m for that. But I urge you not to make the roads too good; one will not see the River scene adequately at 60 miles an hour. And part of the exhilaration in visiting a new area comes in overcoming conveniences such as relatively primitive facilities, limited speed roads, and so on. It needs to be different from ‘at home.’” (Individual, San Francisco, CA - #45)

“I like driving on narrow roads and consider it part of the National Park experience. . . we have viewed winding through the huge rocks at the entrance station as a signature part of our trip to Yosemite. If we wanted to drive on a wide road, we would pick any of a couple of million miles of such roads in California.” (Individual, Albany, NY - #235)

Response: The purpose of National Park roads are summarized in the *Park Road Design Memorandum* dated February 20, 1986. This memorandum states that park roads are intended to enhance visitor experience while providing for the safe and efficient accommodation of park visitors and to serve essential management access needs. The purpose of park roads remains in sharp contrast to that of the federal and state highway systems. Park roads, in general, are not intended to provide for fast and convenient transportation.

Specific road improvements recommended by the Preferred Alternative of the *Final Yosemite Valley Plan/SEIS* (as described in Vol. IA, Chapter 2, Alternatives) are recommended to address safety problems, improve the visitor experience by reducing conflicts with other users, and/or reduce impacts of roads on park resources. Road projects would continue to be designed in a way to maintain the “signature” park experience found in Yosemite characterized by more narrow and winding roads.

1118. Public Concern: The National Park Service should justify the Finding of No Significant Impact regarding the El Portal Road project.

“The wide swath of destruction and deep cuts into the embankments along the road from the Valley to El Portal is being done to expand the road for the purpose of accommodating buses. The contractor is performing heavy cuts, and trenching into the banks along the Merced River, while dynamiting the face of the mountain to make room. The environmental impact statement concluded that there would be ‘no significant impact.’ This conclusion is impossible and incorrect.” (Individual, Malibu, CA - #6079)

Response: This concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan*. This issue has been addressed through litigation. The El Portal Road project between El Portal and the intersection with Big Oak Flat Road has been completed. Although the reconstruction of the El Portal Road between the intersection with the Big Oak Flat Road and Pohono Bridge is proposed in the Preferred Alternative of the *Final Yosemite Valley Plan/SEIS*, additional regulatory compliance, including public involvement, would be required before this project could be implemented. (Also see response to concern #240.)

1119. Public Concern: The National Park Service should reconsider widening of the El Portal Road.

“The gorge is not protected from having a passing lane added in 2020 or 2030 . . . The new Hwy 140 has the capacity for today’s visitors but probably lacks the capacity for the 7 million visitors the park may get in 2020 or the larger buses of 2020. . . Narrow windy roads are the only present protection from huge numbers of visitors. This



plan should state unequivocally that 140 can never be widened beyond the width . . . today. This would not need to stop the construction of section 1d.” (Individual, Fresno, CA - #6083)

“The Merced floods frequently, and I believe any narrowing of the channel will only exacerbate the flooding as well as undercut the road. If the road is widened by cutting deeper into the valley wall on the roadside farthest from the river, it will make the valley wall more prone to landslides than it already is. I really think the practical long-term solution is to develop another entrance to Yosemite which is fed from another road.” (Individual, San Francisco, CA – #611)

“This is a classic example of changing, modifying, manipulation, and destroying the natural environment to meet our needs, rather than changing our behavior to fit better with natural process. . . the simple answer is to have people drive slower and use smaller, narrower buses or better yet use bicycles.” (Individual, Oakland, CA - #3112)

Response: The El Portal Road is being reconstructed between the Yosemite National Park boundary and the intersection with Big Oak Flat Road. The environmental impacts of the project were evaluated in an Environmental Assessment and the project included mitigation measures to ensure ecological integrity. The *Final Yosemite Valley Plan/SEIS* does not propose additional widening of this same portion of the road. The plan does include implementing a traveler information and traffic management system that would be used to manage the number of vehicles entering the park so as not to exceed the capacity of parking areas and roads such as the El Portal Road. The *Final Yosemite Valley Plan/SEIS*, however, does propose reconstructing the segment of El Portal Road from the Big Oak Flat Road intersection to Pohono Bridge to make the road less prone to damage from floods, to improve traffic safety, and to provide better protection to the riparian areas along the road. Additional regulatory compliance, including public involvement, would be required before this project could be implemented. Operating speed and size restrictions for vehicles using this road would be considered as part of the final design process.

Developing other routes into the park is beyond the scope of the *Yosemite Valley Plan*.
(Also see response to concern #240.)

1120. Public Concern: The National Park Service should impose a vehicle size limit in Yosemite National Park.

“If commercial buses or horse trailers or maintenance equipment get longer they should be forbidden from the gorge. Boldly state a vehicle size limit. Do not naively think that in the next 50 years vehicles are going to stay the same size.” (Individual, Fresno, CA - #6083)

“I’ve recently been making the rounds of RV shows and dealers, and the trend there . . . is toward BIG. . . they’re huge, and there seem to be millions of them. . . I’m hoping that you . . . are not basing your planning assumptions on historical data, because if the RV industry has their way the number and size of the RV’s seeking to use Yosemite will be totally unlike anything we have seen before. . . if you are uncertain, and you have latitude for discretion . . . err in the direction of river protection, than to try to accommodate an increase in RV tourism that will quickly overwhelm any solution you implement now. I would truly hate to visit Yosemite two years from now and find it hopelessly clogged with tin and glass behemoths.” (Individual, West Hartford, CT - #208)

Response: Vehicle size restrictions in Yosemite National Park are based upon safety considerations and this would continue under any alternative presented in the *Final Yosemite Valley Plan/SEIS*. An automatic and arbitrary limitation is not being considered.

1121. Public Concern: The National Park Service should provide mitigation for the El Portal Road construction along the Merced River.

“Road widening projects such as that of Highway 140 and other future developments should be properly analyzed so that the riparian ecosystem of the river is maintained.” (Individual, Irvine, CA - #336)

ELEVATED ROAD

“My question is: Would it make sense for part of the El Portal Road to be reconstructed as an elevated road? The serious routing and environmental concerns of the Blue Ridge Parkway at Grandfather Mountain were solved only by making an elevated road at Linn Cove Viaduct.” (Individual, Oberlin, OH - #93)

Response: The El Portal Road is being reconstructed between the Yosemite National Park boundary and the intersection with Big Oak Flat Road. The environmental impacts of the project were evaluated in an Environmental Assessment and the project included mitigation measures to ensure ecological integrity. The *Final Yosemite Valley Plan/SEIS* does not propose additional widening of this same portion of the road. The plan does include implementing a traveler information and traffic management system that would manage the number of vehicles entering the park so as not to exceed the capacity of parking areas and roads such as the El Portal Road. The Preferred Alternative of the *Final Yosemite Valley Plan/SEIS*, however, does include reconstructing the segment of El Portal Road from the Big Oak Flat Road intersection to Pohono Bridge to make the road less prone to damage from floods, to improve traffic safety, and to provide better protection to the riparian areas along the road. Operating speed and size restrictions for vehicles using this road would be considered as part of the final design process.

Developing other routes into the park is beyond the scope of the *Yosemite Valley Plan*. Mitigation measures to be employed during construction of the segment of the El Portal Road recommended by the *Final Yosemite Valley Plan/SEIS* are described in Vol. IA, Chapter 2, Alternatives.

1122. Public Concern: The National Park Service should create a new road to the campgrounds in the East Valley.

“The final piece of the plan for resolving the traffic related problems in the Valley is to create a new road to campgrounds in the east end of the Valley, thereby allowing campers to completely bypass the Curry parking lot road system. This proposed road would be on an existing roadbed and reestablishes the road which was eliminated many years ago.” (Individual, American Canyon, CA - #3126)

Response: The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* proposes that access to the campgrounds in the east end of the Valley would be provided along a new road connection along the north edge of Curry Village, south of the existing day-visitor parking area at Curry Orchard. The existing road across Stoneman Meadow would be removed and the area restored. Establishing a road on the north side of the east Valley would preclude the removal of Sugar Pine Bridge, thus reducing the ability of the National Park Service to restore the natural dynamics and hydrological processes of the Merced River.

1123. Public Concern: The National Park Service should address the application of Revised Statute 2477 to roads inside National Parks.

“I have just read about a revised Statute 2477 which gives counties power to assert 17,000 road claims into national parks and forests, wildlife refuges, and tracts administered by Bureau of Land Management. This could change the appearance of the parks forever, bring more crowds, destroy delicate resources and interfere with the appreciation of beauty and interfere with visitor’s solitude. It needs to be stopped in all parks.” (Individual, Sonoma, CA - #1436)

Response: Revised Section 2477 concerns rights-of-way established across public lands under the Mining Act of 1866. Although repealed by Congress in 1976 with enactment of the Federal Land Policy and Management Act, valid rights-of-way for roads constructed on public lands before 1976 were not subject to the repeal. Determinations of Revised Section 2477 right-of-way assertions are not planning decisions and are not within the scope of this plan. In the event that a party successfully asserts a valid claim to a right-of-way across National Park Service land, the National Park Service retains the authority to regulate use of a Revised Section 2477 right-of-way. (See U.S. v. Vogler, 859 F.2d 638, 642 [9th Cir. 1988].)



3.11.2 ~ Bridges

1124. Public Concern: The National Park Service should maintain and restore bridges in Yosemite National Park.

“Any rational plan to allow access to both sides of the valley to accommodate park administration and visitors will require bridges. All bridges have finite life spans, and hence must be replaceable. The present bridge’s effect on the river except for persistence in one location may not be grossly different than that of large down woody debris. In addition, except during construction, a different type of bridge could minimize effects on the river and still allow access to both sides of the river. It is critical to any alternative chosen that tasteful and practical bridge maintenance, restoration and replacement be allowed.” (Individual, Julian, CA - #37)

Response: The National Park Service agrees that proper maintenance of infrastructure and stewardship of cultural resources, such as historic bridges, is necessary. Most bridges would remain in the Valley under all alternatives. The historic bridges proposed for removal are those that have the most adverse impact on the natural flow of the Merced River and are not critical links in the traffic circulation system. The remaining bridges would receive the proper maintenance to maximize their useful lifespans and, when it becomes necessary, restoration would be considered as a viable option. In particular, all the historic bridges are considered culturally significant, and any maintenance, rehabilitation or restoration work would be performed in an appropriately sensitive manner in conformance with the Secretary of Interior’s Standards for Archeology and Historic Preservation. Any new bridges constructed in Yosemite Valley would be designed to avoid impacts to the free-flowing condition of the Merced Wild and Scenic River and to the river’s Outstandingly Remarkable Values.

1125. Public Concern: The National Park Service should not remove bridges in Yosemite National Park.

“The matter of bridge removal is troubling. The present bridges could well qualify as historic, and many people find them aesthetically pleasing. Also, bridges are essential for reasonable circulation of shuttle buses, and for emergency vehicles. My suggestion is to leave the bridges alone, except for essential maintenance.” (Individual, Woodland, CA - #2)

“Because I travel largely by foot within the Valley, I am concerned about plans to remove bridges. . . Bridges can be redesigned as well as removed.” (Individual, San Francisco, CA - #248)

ENSURE SAFETY

“The park bridges and road systems provide access to scenic viewsheds and to less accessible park locations for the disabled, handicapped, elderly, less mobile and all park visitors. They also provide or emergency response and evacuation in case of fire, flood, avalanche, earthquake, or other natural or human-caused incident or disaster. Rather than removing . . . a better alternative might be to restrict their use to emergency and special vehicles only.” (California Department of Transportation, Sacramento, CA - #591)

Response: The historic bridges are regarded by the National Park Service as important components of the cultural landscape. Eight of the bridges (those that embody a rustic, stone veneered appearance) are listed on the National Register of Historic Places. National Park Service policy and federal preservation law require agencies to carefully consider the value of historic properties when undertaking planning that might adversely affect these resources. Hydrologic studies, available in the Yosemite Research Library, indicate that several bridges are having an adverse impact on the natural flow of the Merced River. While it may be feasible to retrofit some bridges to minimize the negative impacts on the river hydrology, in many cases these retrofits would likely destroy the historic and architectural integrity of the bridge, without fully accomplishing the goal of restoring natural processes. In order to meet goals of natural restoration and yet preserve a significant representation of this cultural resource, the Preferred Alternative proposes to remove bridges and adjacent human-made bank reinforcements (such as riprap) in a phased

approach. The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* proposes to initially remove one of the historic bridges, Sugar Pine Bridge, which is causing the most significant ecological degradation. Stoneman Bridge would be removed next, but only if monitoring indicates it continues to cause unacceptable impacts to the river's natural hydrologic flow. When the difficult choice is made to remove a bridge, mitigating measures, as outlined in the *1999 Yosemite Programmatic Agreement*, would be implemented. These measures include Historic American Buildings Survey/Historic American Engineering Record documentation as a historical record of the resources, salvaging historic materials, and interpretation.

(Also see responses to concerns #11, #1054, and #1124.)

1126. Public Concern: The National Park Service should include a new bridge for emergency egress from Wawona.

"In order to provide an alternative egress (in case of an emergency), one of the projects identified by the [Wawona Advisory Committee] is the construction of a new bridge. The bridge would link the two dead end roads (at or near the ends of the roads) to give an alternative emergency egress route. Construction of the bridge would definitely be within the boundaries of the land governed by the River Plan, and the River Plan could impact this important project if it is not accommodated by the River Plan." (Mariposa County Board of Supervisors, Mariposa, CA - #1637)

Response: This concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan*. Plans for emergency egress in Wawona are not part of the *Yosemite Valley Plan*, but would be part of specific planning for Wawona. Any bridge over the Merced River in Wawona would be designed to avoid impacts to the free-flowing condition of the Merced Wild and Scenic River and to the river's Outstandingly Remarkable Values. Also, the area described may be in legislated wilderness which would prohibit the construction of a road or bridge.

1127. Public Concern: The National Park Service should not allow building of bridges across the South Fork of the Merced.

"Although the Bishop Creek Trail to the South Fork of the Merced should be maintained, the NPS should not support or endorse projects such as building of bridges across the South Fork. Any South Fork bridges would greatly alter current impacts in the Bishop Creek area." (Individual, Mariposa, CA - #1523)

Response: This concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan*.

The *Yosemite Valley Plan* does not propose the building of any additional bridges on the South Fork of the Merced River. Any bridges constructed in the future within the Merced River corridor would be subject to the restrictions of the River Protection Overlay and a Section 7 determination process under the Wild and Scenic Rivers Act. Both components of the *Merced River Plan* protect the river corridor from direct and adverse impacts to the Outstandingly Remarkable Values and the free-flowing condition of the river.

1128. Public Concern: The National Park Service should reclaim roadbeds if bridges are removed.

"If you insist on removing the two (Sugarpine and Ahwahnee) that are now oversized, be sure to delete the entire (elevated) roadbed they once served; it is scaled for driving, not walking or cycling." (Individual, Oakland, CA - #6276)55.

Response: The *Draft Yosemite Valley Plan/SEIS* identified three bridges (including Stoneman Bridge) for possible removal in the Preferred Alternative due to their severe impacts on Merced River hydrologic processes. In response to public comments, the *Final Yosemite Valley Plan/SEIS* proposes, instead, a phased approach to bridge removal. Sugar Pine Bridge, which is causing the most significant ecological



degradation, would be removed first. Stoneman Bridge would be removed only if the removal of Sugar Pine Bridge did not restore natural river dynamics to the river to a sufficient degree. If Stoneman Bridge remains, it would continue to provide a multi-use trail link between Curry Village and Yosemite Village. If Stoneman Bridge were removed, a multi-use trail would be developed from Yosemite Village to the Campground using the Ahwahnee Bridge. The specific routing of the trail and its design are beyond the scope of the *Final Yosemite Valley Plan/SEIS*. In areas where roads or trails would be removed, the area would be restored to natural conditions.

3.11.3 ~ Regional Transportation and YARTs

1129. Public Concern: The National Park Service should adopt a regional transportation system for Yosemite.

“Please register my interest in supporting a regional transportation system as an alternative to the private automobile in Yosemite Valley. However, it is inappropriate and counter to the ideals originally put forth in the 1980 concept, as well as counter to the preferred Yosemite experience, to put any auto parking at Taft Toe.” (Individual, No Address - #6051)

Response: This concern is acknowledged; however it is outside the scope of the *Yosemite Valley Plan*. The National Park Service is supportive of a regional transportation system that serves visitors and employees and provides an alternative to private vehicles but does not have the authority to create such a system or mandate its use. The implementation of a regional transportation system is being considered as part of the Yosemite Area Regional Transportation System (YARTS). The National Park Service is a partnering agency in YARTS, which also includes the U.S. Department of Transportation, the U.S. Forest Service, the California Department of Transportation, and Merced, Mariposa, and Mono Counties. However, YARTS is an independent action from the *Yosemite Valley Plan/SEIS*. The *Yosemite Valley Plan/SEIS* can be implemented with or without a regional transit service by YARTS or other entities. In the *Final Yosemite Valley Plan/SEIS*, YARTS is analyzed as a potential cumulative impact. A description of the YARTS program is located in Vol. II, Appendix H.

3.11.4 ~ Buses

1130. Public Concern: The National Park Service should promote public transportation in Yosemite National Park.

“With Yosemite, the Park Service has a unique opportunity to set an example of accommodating the public with public transportation, rather than continue letting private cars contribute to the decline of the Park. Glacier, Yellowstone, and other national parks all stand to benefit from Yosemite’s example of phasing out the private car. A propane shuttle would be an interim vehicle until restoring the Yosemite Valley Railroad, which should be electric in its new incarnation. In the meantime, we can farm out the shuttle to Greyhound which for years has been transporting people to out-of-the-way places at affordable prices, and at a profit.” (Individual, Berkeley, CA #215)

Response: The *Final Yosemite Valley Plan/SEIS* proposes changes in modes of access to Yosemite Valley and travel within the Valley that greatly expand the role of public transportation. The number of vehicles entering the Valley would be managed so as to be consistent with the capacity of parking areas and roadways. Most day visitors in the peak season would travel to the Valley in shuttle buses from parking areas located on the approach routes to the Valley. Shuttles operating to and from the out-of-Valley parking areas and shuttles operating within Yosemite Valley would use the cleanest and quietest propulsion systems that are practical and affordable.

Transit access to Yosemite from surrounding areas is being planned through a separate planning process by the Yosemite Area Regional Transportation System (YARTS). Projects such as the restoration of the

Yosemite Valley Railroad are outside the scope of the *Yosemite Valley Plan* and would need to be considered in a separate planning process, perhaps involving YARTS.

1131. Public Concern: The National Park Service should consider providing shuttle service from El Portal.

“The Park service should look at the feasibility of setting up shuttle service to El Portal for use by staff. This might even be tied in with shuttling Park visitors who stay in lodging in El Portal, further reducing traffic into the Park. This scenario might even be seen as beneficial compared to the current situation in the Park – overcrowded with both buildings and vehicles. It might be seen as an economic benefit to the residents of El Portal to have more overnight visitors.” (Individual, Florissant, CO - #142)

Response: The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* proposes shuttle service to Yosemite Valley for employees and visitors parking on public land in El Portal. In addition, the National Park Service supports the Yosemite Area Regional Transportation System (YARTS) but does not have the authority to create such a system or mandate its use. The National Park Service is a partner in YARTS. YARTS is currently demonstrating employee and visitor transit service from El Portal and other locations on Highway 140. For more information on YARTS, see Vol. II, Appendix H.

1132. Public Concern: The National Park Service should restrict tour bus operations.

“The National Park Service should not be encouraging more tourism by widening roads for tour buses, which should be limited or banned from the Park instead.” (Individual, La Habra Heights, CA - #3040)

“Parking of tour buses should be limited perhaps to only attractions and a few day use zones.” (Individual, Berkeley, CA - #3130)

“Severely restrict tour buses. One tour bus causes more noise and pollution than 100 cars. . . Restrict tour bus parking to Attraction and a few Day Use Zones. Require buses to turn off engines when stationary.” (Individual, Berkeley, CA - #615)

Response: The Preferred Alternative of the *Final Yosemite Valley Plan/SEIS* assumes that commercial bus use would remain at current levels. The number of commercial buses that can be in Yosemite Valley at one time is determined by the availability of bus parking spaces in the shuttle bus storage area, and the use of the 16 bus bays (loading/unloading spaces) at the Transit Center. The Preferred Alternative calls for the development of a traveler information and traffic management system that would use available parking to control the number of vehicles in the Valley. (Also see response to concerns #36 and #305.) Commercial tour buses would be required to drop passengers off at either the Transit Center or at overnight accommodations. The buses would then park in a bus parking lot away from public areas. The Preferred Alternative calls for a section of El Portal Road between Pohono Bridge and the Big Oak Flat Road intersection to be reconstructed and slightly widened for safety reasons. (Also see response to concern #1119.) The *Final Yosemite Valley Plan/SEIS* does not call for roads leading into the Valley to be widened. The size of buses allowed into the park is based on road characteristics (width, curve, etc.) and is outside the scope of this plan.

1133. Public Concern: The National Park Service should use buses that burn cleaner fuel.

“The widening of route 140 to accommodate more tour buses would increase bus traffic, which would contribute to the particulate and ozone concentrations in the Valley, as well as the Merced River corridor. If bus traffic is increased, then buses should use cleaner fuels. Furthermore, diesel shuttle buses within the Valley should be replaced by cleaner fuel alternatives.” (Individual, Berkeley, CA - #138)



Response: The action alternatives in the *Final Yosemite Valley Plan/SEIS* call for improvements to El Portal Road between Big Oak Flat Road and Pohono Bridge. Improvements would be designed to reduce the likelihood of damage to the road in the event of floods and to improve the safety of the road for existing traffic. Similar improvements on the portion of El Portal Road between the Yosemite National Park boundary and the Big Oak Flat Road are scheduled to be completed in 2001.

The number of tour buses traveling on El Portal Road would not change as a result of the Preferred Alternative in the *Final Yosemite Valley Plan/SEIS*. Tour buses access would provide for the same percentage of day visitors and overnight lodge guests as is provided under the No Action Alternative. The air emissions of the tour buses are not yet regulated by the National Park Service.

The Preferred Alternative includes additional bus travel on El Portal Road by shuttle buses from out-of-Valley parking in El Portal. The *Final Yosemite Valley Plan/SEIS* seeks a balance in accommodating visitor travel needs, while protecting natural resources such as air quality and natural soundscapes. The availability of proven transit vehicle technology, supporting infrastructure (such as refueling and maintenance facilities), environmental characteristics (including air emissions and costs), are all major factors in decisions related to transit vehicle selections. The park has conducted a number of studies of transportation alternatives for travel to and in the Valley and continues to work with other federal agencies and transportation consultants to evaluate alternative transportation fuels and technology.

The National Park Service is actively moving toward using the cleanest and quietest transit vehicles in the Valley. The National Park Service makes the commitment in Vol. IA, Chapter 1 of the *Final Yosemite Valley Plan/SEIS* to continue implementing technologies that reduce mobile sources of air pollution.

Section 3.12 ~ Vehicle Management

3.12.1 ~ Traffic Management

1134. Public Concern: The National Park Service should find ways to lessen the impact of peak season visitation in Yosemite National Park.

“We do not understand why such a drastic year-round fix is being considered when the problem exists during holidays and only a few months out of a year. It seems that many things could be done to limit the numbers that enter the park during peak times. . . encourage off-peak visits to the park by lowering the entrance fee. . . raise the entrance fee during really peak times . . . encourage and spread the visitation over an entire year. . . optional transit system from the gateway communities . . . day-use reservation system . . . and why not just close the doors when the daily limits have been reached?” (Individual, No Address - #593)

“Rather than trying to create a massive new infrastructure for replacing private autos with a public bus system in-and-out of the Park, I think we’d all be better served by a system of day-use ‘rationing’ during peak-season, June 15 to September 15, perhaps. This is environmentally more practical, inexpensive, and, in truth, impacts almost solely, the Central Valley towns near enough to use the valley as ‘their park.’” (Individual, Piedmont, CA - #151)

Response: The *Final Yosemite Valley Plan/SEIS* provides day-visitor parking for private vehicles and tour buses sufficient to accommodate the visitor use levels prescribed in the 1980 *General Management Plan*. In the *Final Yosemite Valley Plan/SEIS*, Vol. IA, Chapter 2, Alternatives—Actions Common to All Action Alternatives, there is a reiteration of the Yosemite *General Management Plan* maximum use level of 18,241 visitors per day in Yosemite Valley. This number was calculated using the number of campsites, lodging units, and day-visitor parking places provided in the *General Management Plan*. The proposed action provides parking for day visitors in Yosemite Valley and in out-of-Valley parking areas along the approach routes to the Valley. During the peak season, shuttles would transport visitors from the out-of-Valley parking areas to the Valley. In addition to parking for day visitors, the Preferred

Alternative would provide facilities for transit buses that could bring additional day visitors to the Valley from locations outside the park. The plan also proposes a traveler information and traffic management system that would manage the number of vehicles in the Valley to the number of parking spaces and the capacity of the roads. The traveler information and traffic management system may use a combination of methods to allocate visitor vehicles among the available parking areas. The system also may employ incentives for visitation during off-peak times or for travel to the park by means other than private automobiles. The incentive may include pricing and other strategies.

(Also see response to concerns #36 and #605.)

From November through March it is expected that the parking spaces provided for day visitors in the Valley would be sufficient to serve all day visitors. As a result, from November through March the out-of-Valley parking areas would be closed and no out-of-Valley shuttle service would operate. Because the number of parking spaces in the Valley would be adequate to serve all day visitors during the off-season, the traveler information and traffic management system proposed in the plan would use a different set of tools.

No criteria have been developed to establish limits on visitor use to protect resources and visitor experience values. The *Yosemite Valley Plan* does not propose specific limits on visitation to the Valley. The plan proposes to complete a Visitor Experience and Resource Protection study within five years of a Record of Decision. If the results of that study indicate a need to establish maximum visitation levels for Yosemite Valley, supplemental environmental compliance would be conducted as required.

1135. Public Concern: The National Park Service should retain existing traffic patterns in the Valley.

“Keep North and South Drives intact as is, 2 lanes, one way. N.B. single lane roads, or 2 way roads would slow traffic, cause horn honking (at slow or distracted drivers) and thus reduce the river experience significantly.”

(Individual, Berkeley, CA – #3130)

“Northside Drive and Southside Drive must remain open all year, as they are now: one way, two lanes each . . . Single lane roads or two-way roads would slow traffic, cause congestion, cause horn honking (noise pollution) and thus reduce the river experience. Safety would also be seriously compromised. . . Closing Northside Drive might be nice for Park employees who live in the area and thus have more time, but would seriously limit access to visitors who come for only a few days.” (Individual, Berkeley, CA - #615)

Response: Northside Drive is proposed to be closed to vehicle traffic from Yosemite Lodge to El Capitan crossover in order to provide a multi-use paved trail and to offer visitors an area near the Merced River that is unaffected by traffic. The closure of this portion of Northside Drive to vehicle traffic would require Southside Drive to be converted to two-way traffic from Sentinel Bridge to El Capitan crossover.

The traffic management strategies and changes to overnight visitor capacity proposed in the plan would result in a decrease in traffic on Southside Drive east of El Capitan crossover and Sentinel Bridge, even with two-way traffic. The traffic volume on Southside Drive would be similar to or less than the volume of traffic using two-lane, two-way roads elsewhere in the park. By removing all of the vehicle trips from visitors exiting the park from Northside Drive at the Lodge, traffic congestion in that area would be reduced. Traffic congestion in Yosemite Village would also be reduced because visitors exiting the park from Curry Village and the campgrounds would travel along Southside Drive, rather than through Yosemite Village. Traffic flow would also be improved at the intersections of Sentinel Road with Northside Drive and Southside Drive. With lower volumes of traffic using Southside Drive and no traffic on Northside Drive, noise levels along the Merced River between Camp 4 (Sunnyside Campground) and El Capitan crossover would be reduced. Occasional horn honking could affect the sound environment, but the overall effect of the proposed traffic changes would be beneficial to visitor experience along the river.



Two-way traffic on similar two-lane roads occur on all other roads in the park and on roads leading into the park from gateway communities. Traffic accident rates on two-lane, two-way roads throughout the national park system are generally low. A detailed engineering study of Southside Drive would be performed to identify needed improvements to assure safe operation of the road considering the types of vehicles that will use the road.

Adequate turnouts would be provided to allow slower vehicles, such as Valley Tour trams, to be passed by other vehicles. Turnouts at historic views would also remain for short stops. Two-way operation of Southside Drive may result in somewhat slower travel, but the benefits to visitor experience of providing a long stretch of the north side of the Merced River that is not affected by vehicle traffic outweigh the slight inconvenience that slower traffic would cause.

1136. Public Concern: The National Park Service should gradually implement proposed traffic restrictions in Yosemite National Park.

“Provide for a phasing-in period gradually imposing limits. (Do not surprise the public; give highly publicized notice.) Trail periods shall be utilized, with adequate advance notice, to test the adequacy and/or utility of various traffic-limiting procedures.” (Individual, Wimberley, TX - #16)

Response: The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* includes a detailed Sequencing Plan (Vol. II, Appendix M) that describes the steps that would be taken to implement the actions incorporated into the final Preferred Alternative in the plan. The Sequencing Plan provides for a sequential series of changes to traffic and shuttles that would accommodate the possible need for refinements as the implementation of the *Yosemite Valley Plan* progresses.

Traffic management measures would be determined through a separate planning process for the traveler information and traffic management system that is included in the Preferred Alternative in the *Final Yosemite Valley Plan/SEIS*. That planning process would define implementation steps and timing for traffic management measures.

3.12.2 ~ Parking

1137. Public Concern: The National Park Service should increase available parking in Yosemite National Park.

“I have heard people who live in the Park say that over 2000 spaces have been removed from the most popular part of the Valley. If that is anywhere near correct, it is sure to be a big part of the traffic problem during the few crowded weekends of the summer. The only way for senior citizens and disabled people to see the Park is by private automobile. It is also the best way for people with children who have a lot of things to carry. . . It would be an important improvement to increase the parking . . .” (Individual, Fresno, CA - #6373)359.

“Mariposa Grove needs more parking! We were turned away last summer after taking two grandchildren to see the trees – very sad!” (Individual, Felton, CA - #206)

Response: The alternatives considered in the *Draft Yosemite Valley Plan/SEIS* were developed to implement the five goals of the *General Management Plan*, including the goal of reducing traffic and its related congestion. Since 1980, incremental steps have been taken to reduce congestion. Parking areas have been removed from Yosemite Valley to restore resources and to provide improved visitor experience. Parking was removed from the Happy Isles Loop area and Mirror Lake. The area was closed to vehicle traffic because the demand for parking was far higher than the number of parking spaces that could be provided. Shuttle service to the area resulted in greatly improved access for most visitors and less congestion.

The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* proposes to increase the number of parking spaces that are dedicated for use by day visitors from 904 currently to a total of 2,120 spaces (550 spaces in Yosemite Valley and 1,570 in out-of-Valley parking areas). The parking would be in locations that could be easily found by visitors. Visitors would have convenient access to major destinations, including the visitor center.

Parking in Mariposa Grove is outside the scope of this planning effort.

1138. Public Concern: The National Park Service should allow road-side parking in Open Space and Discovery Zones.

“Open Space’ and ‘Discovery’ zones (see pp II-37 to II-40) should allow private cars to park alongside the road for a few hours to allow fishing, walking, butterfly and bird watching, etc.” (Individual, Berkeley, CA - #3130)

“Page I-31. ‘Parking at turnouts . . . detracts from the outward views.’ However, these turnouts allow drivers to see the views without stopping traffic, take pictures, and create fewer accidents.” (Individual, Fresno, CA - #6260)

“Visitor Experience Zones – all should allow a limited number of pull outs for cars.” (Individual, Berkeley, CA - #3130)

Response: See response to concern #1139, following.

1139. Public Concern: The National Park Service should eliminate roadside parking in Yosemite National Park.

“I am against roadside parking which: causes congestion, is unnecessary, and should be prohibited. There are innumerable places outside of Yosemite to swim, fish and raft. Wherever swimming and fishing take place in the Park, such activities should be within walking distance to avoid too much stream side damage.” (Individual, Paso Robles, CA - #28)

Response: For safety reasons, it is not possible to completely eliminate roadside parking in Yosemite National Park. Currently, many roadside parking locations throughout the Valley degrade natural resources, especially those located near meadows. In other areas, the presence of vehicles along scenic viewpoints, in open space, and in discovery areas detracts from the visitor experience. Additionally, there are other areas where roadside parking contributes to traffic congestion and presents safety hazards. There are limited areas in the Valley where roadside parking may be appropriate, and such roadside parking areas as Southside Drive in the Bridalveil Fall area would be retained for the most part. The National Park Service would retain other turnout areas as necessary for safety reasons or to provide access to some historic viewpoints. To accomplish the goals of the *Yosemite Valley Plan*, most roadside parking would be discouraged or prohibited and replaced with improved Valley-wide shuttle access in the Preferred Alternative.

1140. Public Concern: The National Park Service should provide reasonable parking for climbers and hikers.

“Provide reasonable access parking for climbing and trailheads.” (Individual, Elk Grove, CA - #6091)

“The current parking arrangements for the Backpackers Campground, where campers are required to park their . . . a half-mile from their campsite and then walk or take the shuttle to the Backpackers Campground . . . is cumbersome and unworkable, especially for campers who plan to stay in the Valley. . . When users of developed lodgings, who typically have little gear and no food or cooking equipment, can park within easy walking distance of their rooms, it is not appropriate to require walk-in campers to lug all their food, cooking equipment, and day use gear a much greater distance.” (Conservation Organization, San Francisco, CA - #1599)



Response: Climbers and hikers as well as other Valley visitors will have access to parking as well as an expanded Valley-wide shuttle system. Backpackers as well as climbers will have access to the designated backpackers parking area. Besides the backpackers parking and day-visitor parking areas, there will be a spectrum of opportunities for overnight camping for climbers and hikers with a variety of parking options. These options include walk-to sites without parking, walk-in sites with adjacent but separate parking, and drive-in sites with parking spaces at the campsite location. These overnight and day-visitor parking options will provide a variety of choices for climbers and hikers.

1141. Public Concern: The National Park Service should pave the overflow parking lot in Yosemite Village.

“I would suggest paving the overflow parking lot in the village, but no new parking areas in the valley.” (Public Hearing, Sacramento, CA - #3133)

Response: The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* proposes formalizing (including paving) the existing parking at Camp 6 (adjacent to Yosemite Village). The Preferred Alternative calls for consolidating all day-visitor parking in the Yosemite Village/Camp 6 Area.

1142. Public Concern: The National Park Service should build parking lots out of public view.

“Any parking areas remaining are to be for emergency and service vehicles only, be located underground with appropriate natural landscaping on top, or located out of sight in or under one of the very few remaining existing buildings.” (Individual, Walnut Creek, CA - #264)

“If the impacts are comparable, I would go with Taft Toe because it would not be visible from the vista point at the Wawona Tunnel. This is one of the signature views of Yosemite National Park.” (Individual, Menlo Park, CA - #262)

Response: Underground parking was considered but dismissed due to significant impacts associated with underground construction.

None of the day-visitor parking areas proposed in the *Final Yosemite Valley Plan/SEIS* alternatives would be visible from the vista point at the east end of the Wawona Tunnel.

The construction of such facilities would significantly impact ground water movement, and would create significant volumes of soil that would require disposal. In addition, surface parking would be much easier to remove, should the need for parking be reduced because of increased use of transit to travel to the Valley in the future. For these reasons, underground parking facilities were not considered in the *Draft* or *Final Yosemite Valley Plan/SEIS*.

1143. Public Concern: The National Park Service should eliminate day-visitor parking from the Valley.

“We feel eliminating day-use parking from the East Valley and giving people more opportunity to stay overnight in the Valley thus parking their vehicle for the duration of their stay will reduce noise levels and improve air quality.” (Individual, Winnetka, CA - #6259)

“We . . . are strong supporters of a ‘Day Use Parking Area’ either outside the Park, or on the outskirts of the Valley. While camping in the Valley, we have often noticed the noise level and traffic volume suddenly drop in the evening when most Day Use Parking areas have cleared out and only overnight visitors remain. Mornings are also very quiet until the parking lots begin to fill at approximately 9:00 a.m.” (Individual, Winnetka, CA - #6259)

Response: The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* provides a combination of overnight and day-visitor use in Yosemite Valley. Areas proposed for parking in the Valley for day visitors would not necessarily be used for overnight lodging or campsites because of the different types of development and impacts associated with each type of use and the conflicts that would arise.

Providing all parking for day visitors to Yosemite Valley in locations outside the Valley was considered but dismissed in the *Final Yosemite Valley Plan/SEIS* (see Vol. IA, Chapter 2, Alternatives Considered but Dismissed). Serving all day visitors with shuttles from remote locations would require a very large fleet of buses, large parking areas outside the Valley, and year-round operation of the shuttle bus system. The roads leading to the Valley from the north and the south traverse high elevations that are subject to heavy snows in the winter. Operating shuttle buses on these routes in the winter and keeping parking areas cleared of snow would be difficult and expensive. Weather conditions in the winter would make waiting for shuttle buses uncomfortable. The number of parking spaces provided in the Valley for day visitors is adequate to serve all day visitors from November through March, when the heaviest snows occur. Day visitors in the peak season would use the parking provided in the Valley for day visitors in the winter, along with out-of-Valley parking. As a result, a balance of access by shuttle buses and by private vehicles would be provided for day visitors in the peak season.

3.12.3 ~ Transfer Facilities

1144. Public Concern: The National Park Service should reconsider construction of parking facilities in the Valley.

“I feel that Taft Toe parking is inconsistent with a ‘Discovery’ area which you characterize as relatively quiet natural area visitor encounters are low to moderate. I believe you could not contain the effects on the quiet and feeling of natural setting to just the area of parking itself. . . the development of parking at Taft Toe, as I imagine it, would have a major impact on the natural and unspoiled feeling of the West Valley which I associate with the undeveloped naturalness of the river corridor. It bothers me to oppose this because I was a strong supporter of eliminating day use vehicles in the Valley and still support limiting them as much as possible through good public transportation. But, since the cars will be coming in I think from the stand point of least impact on the river corridor/visitor experience, that Camp 6 in the higher use zone is a better option for expanding parking.” (Individual, Snelling, CA - #946)

“I am very strongly opposed to any parking/transit center anywhere in the Valley. I am fully aware that the 1/4-mile river corridor, the lack of further Lodge development, and the absence of a transit center might reduce the number of visitors to the Valley and result in loss of revenue to the concession. We are concerned here with a natural place of great national significance to all Americans. The financial profits of Delaware North and the Valley-as-real-estate should not be more important to the National Park Service than the resources (flora, fauna, rivers, natural features) the Service was created to protect.” (Individual, Santa Barbara, CA - #1437)

YES TO TAFT TOE

“The likely selection of the Taft Toe O/T facility should be revisited. Taft Toe would be a substantial visual blight to the Valley. It would have hazard of rock-fall, and quite importantly would allow substantial amounts of exhaust gases and other pollution into the Valley. Its adequacy with future growth in visitation is doubtful. It would, in itself, limit the number of visitors permitted.” (Individual, Pioneer, CA - #23)

“There must be parking and a check point for transfer of visitors to buses, certainly no closer to the main part of the valley than Taft Toe. At first we thought it would be better even further away but when we realized that Taft Toe is the first feasible location in which traffic from all three major access highways could be collected, we could see the reason for its selection. Any other spot would result in a lot of duplication and confusion.” (Individual, Berkeley, CA - #936)

“The Taft Toe parking sounds good, it should help to control the traffic...” (Individual, Santa Clarita, CA – 230)



“I’d like to refer specifically to the alternatives that allow for the possibility of parking at Taft Toe. I think that is a crime and I would hate to have that happen. I feel that the driving experience -- when people drive into Yosemite, if they are going to be allowed to bring in their cars, they shouldn’t have to see a lot of other cars from the road....” (Individual, Coarsegold, CA - #3232)

“I am vehemently opposed to the National Park Service proposal for a multi-story parking at ...Taft Toe.” (Individual, Napa, CA - #6047)

Response: The parking and transit facilities included in the *Final Yosemite Valley Plan/SEIS* would be provided to accommodate the level of visitor use prescribed in the 1980 *General Management Plan*. The size, location, and function of the facilities are intended to provide adequate accommodation for visitors while achieving the goals of the *General Management Plan*, which include reclaiming priceless beauty, allowing natural processes to prevail, reducing crowding and traffic congestion, and promoting visitor understanding and enjoyment. The purpose of the improvements is not to protect or increase the profits of the park concessioner.

(Also see response to concerns #31, #684, #158, #173, #709, and #515.)

1145. Public Concern: The National Park Service should build a parking facility in the Valley.

“I’m very much in favor of Taft Toe parking facility because I feel that it will actually reduce bus traffic coming in from outside the Park.” (Public Hearing, Sacramento, CA - #3146)

“I believe that the best solution in this regard will entail the construction of a major parking area somewhere close to the Valley floor. . . I know that everyone finds the thought of a parking lot within Yosemite offensive but I have heard no other ideas which come close to practicality.” (Individual, Costa Mesa, CA - #36)

“One solution would be a 3 to 4 level parking garage, landscaped and perhaps built upon to be as unobtrusive as a monstrosity can be made to be. A simple lot would be too expansive, too visible within walking distance of the heart of the transportation hub. Any city dweller knows this.” (Individual, Oakland, CA -#6276)

“We support the 800 vehicle parking area and visitor contact station in Hazel Green Ranch, and the Taft Toe Day Use Parking for all visitors including those entering via Highway 41.” (Individual, Winnetka, CA - #6259)

“A day use parking area at Taft Toe would be more desirable than at Camp 6, as Camp 6 requires vehicles to traverse the entire Valley to park and be in an already congested area.” (Individual, Santa Barbara, CA - #6259)

Response: The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* proposes day-visitor parking in Yosemite Village area (potentially including a portion of the Camp 6 area). The Preferred Alternative also includes parking for day visitors at three out-of-Valley parking areas on the approach routes to the Valley. Locating day-visitor parking near Yosemite Village is proposed because it would result in much less development of facilities in currently undisturbed areas; it would also reduce the potential impacts associated with introducing intensive visitor use in a relatively lightly visited area and it would bring visitors parking in the Valley within walking distance of more popular destinations. The number of parking spaces provided in the Preferred Alternative was determined by analyzing parking needs in each month of the year. Adequate parking would be provided to eliminate the need for out-of-Valley parking for day visitors from November through March.

Underground structures were considered but dismissed because of the extent of impacts of underground construction, including interruption to ground water requires and the need to dispose of layer volumes of soil and the visual impact of above ground structures. Surface parking also was proposed because it could more easily be removed if the need for parking decreases in the future.

(Also see response to concerns #31, #684, #158, #173, #709, and #515.)

1146. Public Concern: The National Park Service should not use Categorical Exclusions to authorize construction in Yosemite Valley.

“A categorical exclusion is being used to create a large new parking area in the river corridor at Camp 6, even before completion the MRP, let alone the Valley Plan or a transportation plan. The Park Service has created new disturbances in multiple new and expanded staging areas for construction projects in the El Portal Administrative District and in Yosemite Valley, etc. These staging areas look to become de facto new or expanded parking areas. The use of such categorical exclusions and creation of new disturbances and de facto parking areas that circumvent public process and environmental compliance are both wrong and improper.” (Conservation Organization, San Francisco, CA - #1705)

Response: The issue of use of categorical exclusions for past or current construction projects in Yosemite Valley is outside the scope of the Yosemite Valley Plan. However, a categorical exclusion was deemed appropriate for minor improvements to a temporary parking area and associated facilities at the Camp 6 location. This action was necessary to meet an immediate need for traffic management and visitor assistance actions separate from the long range planning of the Yosemite Valley Plan. The facilities were temporary, limited in scope, and sited in a previously disturbed area. Consequently, this action met the requirements of Categorical Exclusion 7.4 (c) 17 under Departmental Manual 516: “Construction of minor structures, including small improved parking lots, in previously disturbed or developed areas.”

As stated in Chapter 1, Purpose and Need, of the *Final Yosemite Valley Plan/SEIS*, the National Park Service is committed to conducting the appropriate level of compliance with the National Environmental Policy Act (NEPA) for all projects occurring in Yosemite Valley consistent with the Council on Environmental Quality regulations and National Park Service NEPA Guidance (NPS-12). Categorical exclusions, environmental assessments, and environmental impact statements are all legally acceptable methods for documenting compliance with NEPA, depending upon the nature and potential impacts of the action under consideration. The National Park Service will carefully evaluate each project or action to determine the appropriate level of NEPA compliance and acknowledges public concern over their opportunities for involvement in the decision-making process.

1147. Public Concern: The National Park Service should not build parking structures in gateway communities.

“No destroying the Mother Lode by building parking garages in towns like Mariposa. Small-town city fathers may favor parking structures in order to receive kick-backs, but the vast majority of folks in the Gold Country live there to get away from the rat-race.” (Individual, Berkeley, CA - #215)

Response: The *Final Yosemite Valley Plan/SEIS* does not propose any parking facilities in gateway communities. In the Preferred Alternative, parking is proposed inside the park at Badger Pass, outside the park, but on federal land, in El Portal, and outside the park on private land at Hazel Green. This last location is surrounded by federal land, but would require approval and a zoning ordinance amendment from Mariposa County.

1148. Public Concern: The National Park Service should address the loss of personal freedom in required use of mass transit in the Valley.

“My last reason for opposition to mandatory central transit is the issue of personal freedom. Yosemite already offers tram buses for people that want to visit the eastern portion of the Valley without having to walk. Mandating bulk transit through the rest of the park interior diminishes the whole notion of the open highway and the American dream. I am not an automotive aficionado . . . but a personal vehicle does have distinct advantages at certain times. As an avid backpacker, I would be greatly inconvenienced by having to compress all of my sightseeing and backpacking gear into a frame pack, only to jostle against other people on a mass transit system.” (Individual, Los Angeles, CA - #6069)



Response: The *Final Yosemite Valley Plan/SEIS* does not propose mandatory mass transit for travel to the Valley. Visitors staying overnight, including backpackers with wilderness permits for areas accessible from the Valley, would be able to park in the Valley (except for visitors staying at walk-to campsites). A portion of visitors to the Valley also would be able to drive their personal vehicles to dedicated parking areas. Visitors for whom the personal freedom of private vehicle travel is of paramount importance could plan ahead. Travel by personal vehicle to locations outside Yosemite Valley would not be restricted or constrained by actions associated with the Preferred Alternative in the *Final Yosemite Valley Plan/SEIS*.

1149. Public Concern: The National Park Service should consider other locations for a transit center.

CAMP 6

“CSERC [Central Sierra Environmental Resource Center] staff have visited the Camp 6 site and we believe it is an appropriate site for parking or for some kind of transit center. We would be supportive of a decision that allows further site-specific consideration of Camp 6 as a location for such a use.” (Conservation Organization, Twain Harte, CA - #947)

FORESTA / EL PORTAL

“It appears that the Foresta area could be a reasonable parking area/orientation site for incoming vehicles from Highway 120 and perhaps from 140 if a new route above El Portal to Foresta is feasible. Otherwise, a visitor parking/orientation site at or near El Portal should be developed for 140.” (Individual, Pioneer, CA - #23)

“I also feel that the day use parking should also be removed from the Valley to a peripheral site. The use of the El Portal area would not appear to be the logical site for relocation of those functions as it would significantly impact on the Wild and Scenic Merced River.” (Individual, San Jose, CA - #154)

BADGER PASS

“A third parking/orientation site could be developed for Highway 41 at Badger Ski Pass Area for non-ski season use.” (Individual, Pioneer, CA - #23)

LOWER RIVER CAMPGROUND

“The current practice of using the Curry parking lot as the primary day use parking lot has created a parking lot that is too crowded and congested, not only with cars and shuttle buses, but also with pedestrians. A simple resolution to this dilemma is to take all the day use parking areas for the entire Valley, and place them into the Lower River Campground, which is already in place level and under tree cover so as not to be visible from Glacier Point. This is a natural location as it is within walking distance to almost all of the east Valley areas of interest and would not require the creation of a new day use parking lot at either Taft Toe or Pohono Quarry. Restrooms are already on site.” (Individual American Canyon, CA - #3126)

WEST OF THE VALLEY

“Automobile parking for visitors should be west of the Valley at such location where parking is not injurious to the Valley proper or the Merced River. Not knowing the topography in the area 15 to 20 miles would seem logical. Persons with a reservation for the day or overnight would board a train or monorail that would take them to the Valley and perhaps smaller units to the scenic spots in a circle making regular stops to board or disembark tourists. Through traffic between Big Oak Flat and Wawona Road would be rerouted to the El Portal area over the top on a bridge without access to the Valley except that a connecting road would lead to the staging or parking area at the train terminal.” (Individual, Petaluma, CA - #139)

CRANE FLAT / CHINQUAPIN

“I do not support a large centralized parking area for day use within the Valley, Rather, they should be located somewhere around Crane flat or Chinquapin.” (Individual, Northridge, CA - #335)

OUTSIDE YOSEMITE VALLEY

“Yarts Buses and Day-use Parking in Wawona: On page II . . . These proposed zoning designations will permit the Park Service to relocate visitor parking from Yosemite Valley to Wawona, with out a public hearing process. This designation also permits the Park Service to locate and construct bus-transit staging areas in Wawona. The board of directors of the Wawona Area Property Owners Association voted unanimously to oppose YARTS bus-transit staging areas in Section 35. . . Permanent day-use parking and bus-transit staging areas should not be located anywhere in the Valley for the Park.” (Individual, Malibu, CA - #6079)

SENTINEL PARKING LOT

“In the 1970s there was a parking lot located at the Glacier Point Four-Mile trailhead, referred to as the Sentinel Parking lot. Campgrounds were located across the road. We suggest this previously impacted area be considered as an alternative to Taft Toe, for a staging area to move day visitors to the eastern end of the Valley. . . From this point, day visitors would be given the alternative to ride a bus, bike, or walk around the Valley.” (Business, Yosemite National Park, CA - #1524)

Response: During the development of the *Draft Yosemite Valley Plan/SEIS*, the National Park Service considered numerous locations throughout Yosemite Valley for the location of a transit center. Locations were initially selected for consideration based on spatial requirement; the location of highly valued resources, rockfall and debris flow zones, and floodplain areas; River Protection Overlay; visibility; and transportation circulation. Explanations for those alternatives considered but dismissed can be found in Vol. IA, Chapter 2, Alternatives Considered but Dismissed. Descriptions of the alternatives considered can be found in Chapter 2, Alternatives. Evaluations of these alternatives can be found in Vol. IB, Chapter 4, Environmental Consequences.

The location identified in the Preferred Alternative of the *Final Yosemite Valley Plan/SEIS* was chosen because it is consistent with the park’s original design concept of locating visitor services in the east end of the Valley. Additionally the Yosemite Village area provides efficient road access, has existing utilities, and is in a previously disturbed area.

(Also see response to concerns #564 and #32.)

3.12.4 ~ Pedestrians and Bicycles

1150. Public Concern: The National Park Service should build a pedestrian underpass to alleviate congestion at the Yosemite Falls crosswalk.

“A solution for the traffic congestion occurring at the Yosemite Falls Crosswalk would be to construct a pedestrian underpass with a raised road bed.” (Individual, Elk Grove, CA - #3151)

Response: The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* alleviates congestion at the Yosemite Falls intersection by relocating Northside Drive development to the south side of Yosemite Lodge, the barrier formed by the road between Yosemite Lodge and the north wall of the Valley from Camp 4 (Sunnyside Campgrounds) to Yosemite Falls. Relocating the road would minimize conflicts between vehicles and pedestrians and allow pedestrian access to be dispersed among a variety of paths, rather than concentrated at one crossing. A grade-separated crossing would be expensive and could be considered restrictive and unattractive by visitors. Also an underpass would unnecessarily constrain hydrologic flows to the Merced River.



Section 3.13 ~ Noise

1151. Public Concern: The National Park Service should enforce existing rules and regulations to reduce noise.

“Regarding noise control, it is incumbent on all Superintendents . . . to enforce existing campground rules and regulations, the posted speed limit on the Valley Floor, the noise from the garbage trucks, the helicopter flight paths over the valley floor at extremely low altitudes, etc.” (Individual, Santa Ana, CA - #321)

Response: This concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan*. The enforcement of existing noise rules and regulations in Yosemite Valley would be an ongoing activity. Helicopter and other overflights performed by park rangers in Yosemite Valley are limited to emergencies only.

Section 3.14 ~ Socioeconomics

1152. Public Concern: The National Park Service should recognize El Portal as a town.

“There is no mention anywhere in any of the alternatives of El Portal being a town or a community, only an administrative site. This is very wrong. There was a town here long before the land was purchased as an administrative site and there has been a town since. There is also an active Town Planning Advisory Committee, of which no mention was made in any alternatives, although Wawona’s Town Planning Committee was mentioned. It is very hard to believe that this was an oversight! We demand to be recognized as a community. We are taxpayers and are Yosemite National Park’s main support. We should be considered and consulted.” (Individual, El Portal, CA - #268)

Response: The National Park Service has recognized the El Portal town and community during the *Yosemite Valley Plan* process by actively informing and consulting with the town and community. In as much, many different National Park Service representatives have met with residents and officials of El Portal over time to discuss natural resource, social, historical, archeological, and land-use issues. The National Park Service has consistently given presentations to the El Portal Town Planning Advisory Committee and the Mariposa County Board of Supervisors to continually update the town and community about planning developments. In response, the National Park Service has incorporated many community values into both the *Draft* and *Final Yosemite Valley Plan/SEIS*. Specifically, several actions proposed in the *Final Yosemite Valley Plan/SEIS*, such as the town square, expanded grocery store and deli, and the community multi-use pathway, plus additional recreational and swimming facilities adjacent to new housing were developed in direct response to the town and community input.

Moreover, the town and community are described in Vol. IA, Chapter 3, Affected Environment—Social and Economic in the *Final Yosemite Valley Plan/SEIS*. Statements added to this section more fully recognize the role of Mariposa County and the El Portal Town Planning Advisory Committee in officially representing the town and community during planning processes. Also included in this section are topics describing El Portal’s population, housing, commuting and traffic, and community life. Lastly, the analysis of impacts provided in Vol. IB, Chapter 4, Environmental Consequences discusses potential impacts to the El Portal Community and town. Specifically Chapter 4 discusses potential impacts to the school (including daycare), law enforcement (including employee and visitor health and safety, and emergency medical services), and other community services (including library and recreation facilities).

1153. Public Concern: The National Park Service should reconsider the Yosemite View land exchange.

“The ‘Parkline/Yosemite View’ land exchange is a disaster! Exchanging a heavily impacted parcel for a pristine riparian area right on the banks of the Merced is certainly a violation of both the spirit and laws of the Wild and Scenic Rivers Act! The area in question, slated for massive commercial development, is a rare wetland in the Merced Canyon. In this exceptional spot can be found every single ‘Outstandingly Remarkable Value’ that are supposed to be protected when making management decisions.” (Individual, El Portal, CA - #1636)

Response: This concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan*. Even though the National Park Service has completed a preliminary review and legislation has authorized a potential exchange of the National Park Service Administrative Site lands, no final decision has been made to pursue a land exchange. If this proposal were to move forward, regulatory compliance would need to be completed, including public involvement. Since this project has been proposed, it is addressed as a potential cumulative impact.

(Also see Vol. IB, Chapter 4, Environmental Consequences and Vol. II, Appendix H.)

3.14.1 ~ Economic Impacts

1154. Public Concern: The National Park Service should ensure that the Yosemite National Park experience is affordable for individuals of diverse socioeconomic backgrounds.

“Yosemite is not a destination resort and it should not be set aside for the rich. Replacing campgrounds, where a modest tent can be pitched, with a hotel room may fill the pockets of a politically savvy corporation, but it does not serve the people, the park, or the future. It directly contradicts the purpose of the National Park Service and it is contrary to the spirit of stewardship that should govern your actions.” (Individual, Coarsegold, CA - #128)

“My personal preference is that Yosemite remain accessible to day users and to low and middle income families who rely on affordable recreation in the park, specifically hiking, bicycling, and tent camping.” (Individual, Livermore, CA - #6348)

ENSURE ENVIRONMENTAL JUSTICE

“You are creating a ‘Wilderness Club Med’ that is being designed, and catering to an affluent Anglo community and foreign visitors.” (Non-Governmental Organization, La Habra, CA - #3069)

Response: The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* provides a range of visitor accommodations specifically with the intent to accommodate visitors from diverse socioeconomic backgrounds, visitors with different levels of ability to access lodging, and visitors with different preferences for low- or higher-cost accommodations. There is special concern for providing economical accommodations so that people are not excluded on the basis of affordability. In the more detailed planning that must be done for the out-of-Valley shuttle system and the traveler information and traffic management system, the cost to visitors and incentives for use of out-of-Valley parking and regional transportation options would be prominent considerations. Overall, and outside the scope this planning effort, the National Park Service is developing strategies for reaching and serving a more diverse constituency, particularly through the efforts of interpretive outreach services (including a partnership with the University of California – Merced) already underway.

(Also see response to concern # 652 and #234.)

1155. Public Concern: The National Park Service should re-evaluate the statistical information used to determine the average household income of park users.

“User Income. The divisions between visitor income groups is completely arbitrary, and an incorrect conclusion is drawn: ‘the highest proportion of visitors to Yosemite National Park . . . has an annual household income of greater than \$100,000.’ (p III-127). In fact, if the \$20 to 60K income levels were grouped together, the percentage would be



35% vs. 26% for over \$100K. Table III-23 is plain bad math and bad statistics, and the conclusion means nothing. The EIS should be reviewed for similar problems.” (Individual, Livermore, CA - #6348)

Response: A table in Vol. IA, Chapter 3, Affected Environment of the *Final Yosemite Valley Plan/SEIS* makes a comparison of household incomes between park visitors and state and regional residents. The division in income levels is intended to show representative income levels for the state and region. The table illustrates that a higher proportion of Yosemite visitors tend to fall into high-income brackets (such as an annual income of greater than \$100,000) than is represented in the state or in the region. National Park Service concerns about under-representation of low-income populations among Yosemite visitors resulted in the analysis of impacts to low-income populations in the *Final Yosemite Valley Plan/SEIS*.

Section 3.15 ~ Park Operations

3.15.1 ~ Park Entrance Stations

1156. Public Concern: The National Park Service should address the impacts of relocating the Arch Rock entrance station.

“If the park service removes the Arch Rock Entrance Station, where will it be located? The new motels and restaurant come close to the up-hill start of the road into Yosemite Valley. Where will the cars be stopped without causing a traffic jam going into the motels?” (Individual, Mariposa, CA - #948)

Response: This concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan*. Should the Arch Rock Entrance Station be relocated or redesigned in its current location, regulatory compliance procedures would need to be completed. The *Final Yosemite Valley Plan/SEIS* allows the entrance station to remain in its existing location. The relocation of the Arch Rock Entrance Station is connected to a proposed land exchange. No final decision has been made to pursue the land exchange. If this land exchange and associated relocation of the entrance station were to move forward, regulatory compliance, including public involvement, would need to be completed. Since relocation of Arch Rock Entrance Station is a foreseeable future project, it is addressed as a cumulative impact (see Vol. IB, Chapter 4, Environmental Consequences).

3.15.2 ~ Park Safety

1157. Public Concern: The National Park Service should improve law enforcement in Yosemite National Park.

“Any responsible plan for Yosemite should: Substantially increase enforcement and fines of critical park rules, particularly with regard to wildlife, litter, defacement, noise, responsible behavior, and parking.” (Individual, Mammoth Lakes, CA - #145)

“Fine and cite (arrest) any degenerates in trucks and SUV’s who try to run down coyotes!!! I’ve witnessed cars and trucks deliberately veering toward coyotes that were on the shoulder of the Valley Road.” (Individual, Pacific Grove, CA - #66)

INCREASE LAW ENFORCEMENT STAFF

“More Rangers are needed - to patrol the park - to reduce vandalism and abuse of facilities - to protect the wildlife and the visitors.” (Individual, Pasadena, CA - #109)

Response: This concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan*. Nonetheless, the National Park Service does address operational needs of the *Final Yosemite Valley*

Plan/SEIS. Yosemite National Park requests increases to its operating budget annually to address high-priority needs.

1158. Public Concern: The National Park Service should streamline Yosemite National Park rules.

“My concern is that there’s so many rules and constraints that those of us who are fortunate to get in will disobey the rules and basically say, ‘To hell with it.’ And so you may have more damage and noncompliance and disruptive visitor.” (Individual, Santa Cruz, CA - #3043)

Response: This concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan*. Park rules and regulations are put in place to protect park resources and visitors.

3.15.3 ~ Park Maintenance

1159. Public Concern: The National Park Service should improve the maintenance of the El Portal Administrative Site.

“The NPS displays a callous lack of regard for the aesthetics in the El Portal Administrative Site. The Maintenance Division in particular is guilty of treating the river bottom, river banks, and open spaces around the town and in Rancheria Flats as a gigantic garbage dump. . . The Maintenance Complex itself looks shoddy from Highway 140. the attitude conveyed is one of chronic disregard for our responsibility as the nation’s premier land management agency, and it is little wonder that the public disrespect for the NPS grows. The Park Service needs to take greater pride in El Portal, to restore the aesthetic value of the river canyon in the Administrative Site, and to project a more professional attitude to the public.” (Individual, Yosemite National Park, CA - #1632)

Response: In 1958, Congress passed legislation for the Secretary of the Interior to provide an administrative site for Yosemite National Park in the El Portal area (16 USC 47-1). This land is under National Park Service jurisdiction, but is not included as part of Yosemite National Park. The purpose of this act is to: . . . “Set forth an administrative site in the El Portal area adjacent to Yosemite National Park, in order that utilities, facilities, and services required in the operation and administration of Yosemite National Park may be located on such site outside the park.”

The management framework under the Preferred Alternative is designed to allow varying degrees of continued administrative use in El Portal while protecting and enhancing the values of the Merced Wild and Scenic River. An issue this specific would not fall under the scope of the *Yosemite Valley Plan*, but may be proposed under one of the park’s implementation plans.

1160. Public Concern: The National Park Service should eliminate the use of the Middle Road in El Portal as a dump site.

HAUL WASTE TO THE COUNTY LANDFILL

“It has only been within the last decade that this area has gone from a natural area to a dump. With the construction of maintenance facilities at Railroad Flat the old bone yard disappeared. With no environmental compliance, the middle road became the new Park Service dump for El Portal. The Park needs to include in its budget hauling fees to the county landfill for such materials.” (Individual, El Portal, CA - #945)

Response: The *Final Yosemite Valley Plan/SEIS* includes the Middle Road area within the El Portal Village Center. Potential activities called for at the Village Center include: a community center, post office, enlarged grocery store/deli, laundry, recreational facilities, office spaces, gas station, and visitor parking. Presently the equipment and materials stored at the Middle Road site are for future projects or repairs. The Middle Road site also contains a wood storage yard and a small area where residents store



brush. As planning efforts are implemented, storage areas and other administrative functions could be consolidated or removed. The *Final Yosemite Valley Plan/SEIS* calls for completion of a site plan for El Portal that would provide site-specific details of where facilities would be located. The public and community would be encouraged to participate in the site planning.

1161. Public Concern: The National Park Service should mitigate the impact of Park Service facilities at Railroad Flat.

“This area of Park Operations and Administration being on the river should have strict guidelines to keep it functioning consistently with the Wild and Scenic River Act. This facility must lay partly in the boundary. It is absurd that the maintenance and warehouse were removed from an area in Yosemite Valley that was well away from the river boundaries and then brought to El Portal and placed right on the river shore. What’s done is done. We now have the opportunity to reverse some of the damage that has been done. A place to start would be to greatly reduce the lighting which shines on the river all night. This is far from wild and scenic.” (Individual, El Portal, CA - #268)

Response: The *Merced River Plan/FEIS* does propose management zoning that would allow for land-use designations in El Portal to support the placement of park operations and administration facilities (Zone 3C). The *Final Yosemite Valley Plan/SEIS* is consistent with the *Merced River Plan/FEIS* zoning prescriptions. Moreover, the proposed classification of the Merced River segment that runs through El Portal is “recreational”, a classification that acknowledges that adjacent lands may have some development. The recreational classification is characterized in the Wild and Scenic Rivers Act as: “Those rivers or sections of rivers that are readily accessible by road or railroad, that may have some development along their shorelines, and that may have undergone some impoundment or diversion in the past.” Finally, all decisions regarding land use and development within the river boundary in El Portal must protect and enhance the related Outstandingly Remarkable Values that have been established for the segment. The recreational classification, Outstandingly Remarkable Values, and related zoning would all serve to guide future and current land-use decisions and actions within the Merced River corridor.

3.15.4 ~ Housing

Note: One response is provided for Public Concerns #1162 and 1163, placed following concern #1163.

1162. Public Concern: The National Park Service should provide adequate housing for Yosemite National Park employees.

“One thing the Park Service needs to address in Employee Housing. Seasonal housing was taken out of Boys Town, part of Camp Curry on the Terrace, Yosemite Lodge Dorms, Ozone, cabins. The Flood of December 1990 damaged so much of this employee housing. Housing is needed for employees working for the concession in Yosemite Valley, better housing and not just tents! Where can they be built away from the river? Would the area where government maintenance is being removed be acceptable? This problem needs to be addressed now even as the River Plan is being made.” (Individual, Mariposa, CA - #948)

COMPEL CONCESSIONER TO PROVIDE BETTER HOUSING

“I started looking around the Park here and what I found are some conditions that are intolerable. . . A hundred and seventy-six million dollars were allocated for flood damage control. Eight million of that, I understand, is allocated to build more lodging for Delaware North. . . But the employees working for the concessioner are living in third-world conditions. The bathrooms are falling apart. You can smell the sewage coming up through there. You should be ashamed of yourselves for allowing this concessioner to treat their employees like they have.” (Public Hearing, Fish Camp, CA - #3239)

1163. Public Concern: The National Park Service should maintain employee housing in Yosemite Valley.

“Employee housing – Keep in the Valley. To have them commute every morning and evening would be too much like Los Angeles.” (Individual, Pasadena, CA - #109)

“‘To protect the rights, safety and security of all visitors and employees’ (Draft VIP, pg. 3). Doesn’t this mean that YNP & Concessionaire employees are not second class citizens, to be moved about at will, with apparent little or no concern for their rights, safety and security? As stated above, employees have the same rights and privileges as any other Yosemite visitor, specifically to enjoy the beauty, grandeur and solitude of the Valley 24 hours a day, not just when they are at work. Most, if not all, who come to Yosemite seeking employment do so with but one thought in mind: to live and work in the Valley, and get away from the city. . . Just one of the many consequences of this proposed housing move may well be that qualified future employees may no longer be interested in a work situation which involves splitting their place of employment and housing. . . The personal safety of an employee must always be of prime importance to management. Willfully forcing employees to drive round trips daily many miles from El Portal to the Valley is putting these employees in harms way.” (Individual, American Canyon, CA - #3126)

“You are asking for problems if you move all of the staff out of present areas. All of these employees need to be available in case of unforeseen problems, i.e. natural disasters, civil unrest, etc. Possible future increased seismic activity could mean more landslides, i.e. outlying areas of increased seismic activity.” (Individual, Saint Johns, AZ - #3203)

“Employee housing is one of the biggest issues facing our members. The housing situation has only become worse in recent years due to the 97 flood and the rock slide at Curry. Hundreds of YCS housing units were wiped out and only some were replace with inadequate ‘temporary’ housing. We think it makes sense to have employees housed near their work and support zoning that would allow new employee housing to be built in the Valley. We don’t agree with relocating housing to El Portal and are concerned about the limited services that exist in El Portal and the impact new housing would bring.” (Non-Governmental Organization, Fresno, CA - #1596)

Response: In the *Final Yosemite Valley Plan/SEIS*, the National Park Service has considered a range of alternatives that would allow a number of employees to remain housed in Yosemite Valley. To accommodate those employees who are relocated outside Yosemite Valley, an employee transportation system would be developed. Most employees commuting to work into Yosemite Valley would be required to use the employee transportation system.

In Vol. IB, Chapter 4, Environmental Consequences—Social Environment, the analysis found that there would be an increase in the number of employee commuters traveling into Yosemite Valley. However, even with this increase in daily commuters, it is projected that the number of trips per day would remain relatively constant because there would be a reduction in personal vehicle trips, which would offset the increase in the number of employee shuttle trips.

The National Park Service has *not* considered the elimination of all employee beds from the Valley. Instead, the number of employee beds in Yosemite Valley would be consolidated into a few areas to allow for efficient land use and resources restoration and would be based upon a number of primary visitor service factors, including the:

1. Type, position, and responsibility of the employee
2. Disabilities of the employee that could prevent commuting
3. Areas that would be available to accommodate employee housing when comprehensively considering highly valued resources, Wild and Scenic River values, and other natural, cultural, and social impacts
4. Specific level of visitor service that would be available in the Valley
5. Level of staffing required to provide acceptable levels of service during emergencies



Additionally, based on an analysis of the job location and duty station, current and projected staffing levels, and the feasibility and operational requirements of an employee transportation system, it has been concluded that it is reasonable, feasible, and safe to consider the relocation of employees outside Yosemite Valley. These impacts are assessed in Chapter 4, Environmental Consequences, in the sections describing transportation and social impacts.

Currently, housing conditions in Yosemite Valley need improvement. It is recognized that the quality and type of employee housing (in addition to its location) plays an important role in the success in the hiring and retention of employees. By improving the quality of new housing, it is anticipated that housing outside Yosemite Valley would become more desirable.

Removal of housing in Yosemite Valley has not been proposed for the “sake of removing beds.” In the Preferred Alternative of the *Final Yosemite Valley Plan/SEIS*, the location of housing has been influenced by the following goals and objectives:

- To reduce congestion

- To remove unnecessary facilities

- To retain in the Valley the number of employees required to provide a moderate level of visitor service during emergencies

The location of housing was also influenced by the land available to accommodate employee housing when considering competing land values and uses.

(This response also applies to the previous concern, #1162.)

1164. Public Concern: The National Park Service should remove employee housing from Yosemite Valley.

“I believe that pursuant to the Valley Implementation Plan as well as the Wild and Scenic River Plan, as much employee housing as possible should be removed from the Valley.” (Individual, San Jose, CA - #164)

RELOCATE OUTSIDE YOSEMITE NATIONAL PARK

“Move all non-essential employees including administration from the Valley out to gateway communities so that El Portal will not need any more development. Plan for the next thousand years and spend the additional money to provide housing and work spaces in the gateway.” (Individual, El Portal, CA - #1691)

RELOCATE TO YOSEMITE WEST

“My group has approximately 750 undeveloped acres at Yosemite West, just one mile west of Chiquopin, which we feel would be ideally suitable for the relocation of employee housing and day use parking. We are in the preliminary stages of subdividing approximately 700 acres of our land into 40 acre parcels for residential use. One or two of those parcels could be used by the Park for those relocation needs.” (Individual, San Jose, CA - #164)

Response: This alternative was considered but dismissed (see Vol. IA, Chapter 2, Alternatives Considered but Dismissed).

The National Park Service has considered a range of alternatives for employee housing to be removed from and/or remain in Yosemite Valley (see Chapter 2, Alternatives) and/or to be relocated to such places as Wawona, Foresta, and El Portal. In each alternative the number of employee beds located in Yosemite Valley would be based on a variety of factors, including the roles and responsibilities that housing occupants would have if there were an emergency. Also, for the concessioner, the number of employees beds in Yosemite Valley would be determined in relation to (1) the area that would be available to accommodate employee housing when considering highly valued resources, (2) Wild and Scenic River

protection values, and other natural, cultural, and social impacts, (3) the services that would be available in the Valley, and (4) the service level criteria for staffing those services.

1165. Public Concern: The National Park Service should not relocate Yosemite Valley employee housing to El Portal.

“I believe that pursuant to the goal of the Valley Implementation Plan ... as much of the employee housing as possible should be removed from the Valley. . . The use of the El Portal area would not appear to be the logical site for relocation of [employee housing] as it would significantly impact on the Wild and Scenic Merced River.” (Individual, San Jose, CA - #164)

Response: During several previous planning processes, the National Park Service has considered several locations for relocating housing outside Yosemite Valley. In the 1980 *General Management Plan*, along with providing general guidance for considering opportunities for housing in the region, it was proposed that housing be located at El Portal. In 1992, the National Park Service deviated from this *General Management Plan* element by proposing to place employee housing in Foresta. Placing housing in Foresta was widely opposed by the public; comment response to the plan overwhelmingly called for the placement of housing in El Portal.

Moreover, in 1958 Congress passed the El Portal Administrative Site Act, which allowed for the National Park Service acquisition of land in El Portal for an administrative site.

To accommodate employees who would be relocated outside Yosemite Valley, an employee transportation system would be developed. It is projected that most employees commuting to work in Yosemite Valley would use the employee transportation system.

In Vol. IB, Chapter 4, Environmental Consequences—Social Environment, the analysis found that there would be an increase in the number of employee commuters traveling into Yosemite Valley. However, even though there would be an increase in the number of commuters per day, it is projected that the number of trips per day would remain relatively constant because there would be a reduction in personal vehicle trips, offsetting the increase in the number of employee shuttle trips

Employee housing in El Portal is consistent with the provisions of the *Merced Wild and Scenic, River Comprehensive Management Plan*. The potential impacts to wild and scenic river values are described in Chapter 4, Environmental Consequences.

For these reasons, it is reasonable and feasible to consider El Portal as a location for employee housing.

1166. Public Concern: The National Park Service should reconsider the removal of the Cascades housing units.

“We do not believe that the Cascades housing units should automatically be removed unless the total balance of relocation, disturbance at another site, and benefits to the existing site are shown to be superior to leaving them on their current site. We support a decision / alternative that allows for the removal of the housing units, but does not force such an action until site-specific analysis validates the benefits.” (Conservation Organization, Twain Harte, CA - #947)

Response: The goals and objectives of the *Final Yosemite Valley Plan/SEIS* call for the reduction of congestion in Yosemite Valley. Removal of the Cascades housing units allows for further reduction of congestion in the Cascades portion of Yosemite Valley by further reducing the number of facilities.



1167. Public Concern: The National Park Service should maintain The Ahwahnee employee housing units.

“[The Ahwahnee Hotel] housing is perhaps the most ‘unnoticed’ employee housing in the entire Valley, by any standard. Although no doubt it needs to be updated, along with many other Valley facilities, placing the employees at a remote sight, with all the related recurring costs, added traffic congestion, inconveniences, etc. is simply not a reasonable plan. The Ahwahnee Hotel’s employee housing should be rebuilt in place.” (Individual, American Canyon, - #3126)

Response: In the Preferred Alternative of the *Final Yosemite Valley Plan/SEIS* the employee dormitory at the Ahwahnee would be retained and remodeled to improve the living conditions. The tent cabins do not meet standards of the Occupational Safety and Health Administration, and would be replaced in a different location.

1168. Public Concern: The National Park Service should reconsider the zoning of the Ahwahnee Row employee housing.

“In the map for the Preferred Alternative in the Draft Valley Implementation Plan, the Ahwahnee Row housing was proposed for removal and restoration, while the Tecoya dormitories were to be retained. Would the zoning of this area as Park Operations and Administration in the MRP preclude consideration of its removal in the upcoming Valley Plan? Why isn’t this area given a mixed zoning designation of Park Operations and Administration-Day Use, like Camp Six, so that the removal of this housing, if mandated in the Valley Plan, would then be consistent with the MRP?” (Recreational Organization, San Francisco, CA - #1599)

Response: The zoning provided in the *Merced River Plan/FEIS* provides guidance for the *Final Yosemite Valley Plan/SEIS*. While it is beyond the scope of the *Yosemite Valley Plan* to reconsider the zoning provided in the *Merced River Plan/FEIS*, a park operations and administration zoning designation in the *Merced River Plan/FEIS* does not preclude the restoration of the site or less intensive use of the site.

1169. Public Concern: The National Park Service should design Yosemite National Park employee housing to mitigate potential flood damage.

“With regard to the Yosemite Lodge Employee Housing Area, one idea might be to rebuild the Annex Dorms as rooms on the second floor, and car port parking for the ground floor. In the event of another significant flood, the cars could be easily moved, and the housing upstairs would be virtually unaffected. This would also result in a reduced parking footprint in the Valley, and utilization of an existing developed area - albeit within the 100 year floodplain - and it would make it unnecessary to have to find another location for employee housing at the Lodge.” (Individual, Elk Grove, CA - #3151)

Response: In the *Final Yosemite Valley Plan/SEIS* the objective is to minimize the placement of structures in the floodplain. In the Yosemite Valley, no housing would be within the floodplain; in El Portal some housing would be in the floodplain and would have flood hazards mitigated. See the floodplains Statement of Findings in Appendix N for a full explanation of flood hazard mitigation. (Also see response to concern #1098.)

3.15.5 ~ National Park Service and Yosemite Concessions Headquarters

1170. Public Concern: The National Park Service should maintain Park Service headquarters in Yosemite Valley.

“Alternative 1. [VIP] labeled as a ‘no change’ alternative (a misnomer), calls for the eventual relocation of both headquarters out of the Valley to El Portal. From a corporate management standpoint, this move is unacceptable. In the operation of any business location, lower and middle management personnel can usually take care of routine

problems on the spot as they occur daily. However, top level corporate management is required to make decisions involving critical actions, such as the 1997 flood, the Happy Isles rock slide, visitor rescues, loss of life, etc. Usually these extreme actions require on the spot decisions, with timing being a critical factor. This immediate critical response cannot be made effectively when corporate management is physically located at a remote location. Responsible corporate management demands a more appropriate physical presence as near to 'where the action is' as possible. A single human life which may be hanging in the balance is certainly worth more than a very small restored spot of natural terrain. This is a bad trade-off. Where is the common sense? These corporate headquarters must remain in the Valley." (Individual, American Canyon, CA - #3126)

Response: Although leaving Yosemite National Park headquarters in Yosemite Valley would indeed retain an important symbol in the Valley, it is not necessary or essential for it to be located in the Valley (see Vol. IA, Chapter 1, Goals and Criteria). Furthermore, Congress passed a law in 1958 establishing the El Portal Administrative Site (see Vol. II, Appendix A) for the purpose of moving park administrative facilities outside Yosemite Valley.

3.15.6 ~ Concessions Management

1171. Public Concern: The National Park Service should eliminate concessions in Yosemite National Park.

"It is a shame to see private concessionaires operating for profit businesses in Yosemite while the Park Service faces continued funding struggles. Better yet, let the NPS run the food and lodging concessions, and all profits can stay in the park to fund sorely needed restoration projects." (Individual, No Address, CA - #6166)

"Buy out all the concessionaires, pay them their blood money and get them out of the Park now." (Individual, Santa Cruz, CA - #3087)

"The duty is not to fulfill the contract of the concessioner. We can get out of that contract. There's more than enough money in Yosemite National Park to do that." (Individual, Cupertino, CA - #3123)

Response: This concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan*. National Park Service policies state that the development of public accommodations, facilities and services in Yosemite National Park shall be limited to those that are necessary and appropriate for public use and enjoyment of the park and are consistent to the highest practicable degree with the preservation and conservation of park resources and values. It is also the direction of Congress that necessary and appropriate accommodations, facilities, and services shall be provided by private business through concession contracts. Concessioners exist in Yosemite National Park because the National Park Service has determined that services are needed to enhance visitor experience. Those accommodations, facilities and services that are necessary and appropriate for public use and enjoyment of Yosemite National Park have been established by public process through the 1980 *General Management Plan* as amended by the 1992 *Concession Services Plan*, and now the *Final Yosemite Valley Plan/SEIS*. The National Park Service contracts with concessioners to provide the accommodations, facilities, and services within Yosemite National Park. The National Park Service controls the concession contracts and the nature of the services provided by the terms of the contract. Concessioners will continue to play an important role in providing necessary and appropriate services to park visitors. The *Final Yosemite Valley Plan/SEIS* further defines the future role of concessioners within Yosemite National Park.

1172. Public Concern: The National Park Service should limit concession operations in Yosemite National Park.

"Reducing concessions in Yosemite will also reduce crowds as well as the need for new employee housing. Joshua Tree National Park, for example, has no concessions, and does not have an overcrowding problem. Granted, there is no existing plan that calls for this, but halting further development is the first step in the right direction." (Individual, La Habra Heights, CA - #3040)



Response: This concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan*. Concession operations levels are established to meet visitor accommodation needs and are approved by the National Park Service. (Also see response to concern #1171.)

3.15.7 ~ Other Park Buildings and Facilities

EL PORTAL

1173. Public Concern: The National Park Service should reconsider the El Portal administrative site exchange.

“... it is imperative to retain this parcel in federal ownership. In the environmental consequences of the MRP the land exchange is stated as having potential adverse effects to wildlife; wetlands; cultural resources; rare, threatened, or endangered species; geology; geo-hazards; soils; ethnographic resources; historic resources; and hydrological processes. Missing was the potential adverse effects to scenic resources. Since the time the El Portal Administrative site was set aside by congress the Sierra Nevada has experienced a great loss of wetland and riparian areas. The Sierra Nevada Ecosystem Project listed riparian ecosystems at this elevation as some of the most threatened. The land exchange is inconsistent with the goals stated for the Merced River Plan.” (Individual, El Portal, CA - #268)

Response: This concern is acknowledged; however, it is outside the scope of the *Yosemite Valley Plan*. Even though the National Park Service has completed a preliminary review and legislation has authorized a potential exchange of the National Park Service Administrative Site Lands, no final decision has been made to pursue a land exchange. If this proposal were to move forward, regulatory compliance (NEPA, WSRA, etc.) would need to be completed, including public involvement. Since this project has been proposed, it is addressed as a potential cumulative impact. (Also see Vol. IB, Chapter 4, Environmental Consequences and Vol. II, Appendix H.)

1174. Public Concern: The National Park Service should not locate park operations and administration facilities in the Hillside East and West area of the El Portal Administrative Site.

“... new development should be minimal because slopes with drainages makes for radiating impacts which all flow down to the river. Also, any development should be done with taste and consistent to scenic values. Road construction for developments seem complicated and impacting and maybe unrealistic for emergency situations. This area offers a site for development without being on the river shore, but we would prefer this not to be zoned Park Administration and operations because we feel no new development is necessary in El Portal. We feel the Park has alternatives for development that have not been fully explored and should be. This narrow river canyon cannot hold the infrastructure necessary to increase the population of the town of El Portal. This area should be zoned 2C.” (Individual, El Portal, CA - #268)

Response: The Preferred Alternative of the *Final Yosemite Valley Plan/SEIS* calls for the placement of employee housing at the Hillside East and West sites. Even though this employee housing land assignment is broadly considered to be administrative, it does not include the offices and facilities that carry out daily operational and administrative functions. The land-use designation for employee housing is consistent with adjacent land uses and with provisions of the 1958 El Portal administrative Site Act.

Final determination of the location of these facilities will be made during the El Portal design process that would follow completion of this plan. Public participation in this process would be encouraged and that would be the place for this discussion.

1175. Public Concern: The National Park Service should relocate National Park Service administrative services to Mariposa.

“We would like to suggest that the NPS looks at Mariposa rather than El Portal as a possible site to relocate administrative services. Services and infrastructure already exist in Mariposa and a relocation to Mariposa would

have less impacts on the Merced River and the community of El Portal.” (Non-governmental Organization, Fresno, CA - #1596)

Response: The goals of the 1980 *General Management Plan* include removing nonessential facilities from Yosemite Valley. The *Final Yosemite Valley Plan/SEIS* proposes to “remove unnecessary facilities from and locate new facilities outside of highly valued resource areas unless there are no feasible alternatives.” Additionally, it calls for removal of National Park Service headquarters and other functions not essential for Yosemite Valley operations from the Valley. National Park Service and concessioner administrative buildings, which serve personnel functions, were evaluated and found to be unessential to Valley operations. The impacts and benefits of relocating these functions were considered. (See *Final Yosemite Valley Plan/SEIS* Vol. IA, Chapter 1, Purpose of and Need for the Action.) Relocation of rank administrative services to Mariposa remains a future option, but the Yosemite Valley planning process must consider reasonable and feasible options that are within the jurisdiction of the National Park Service.

1176. Public Concern: The National Park Service should relocate Yosemite National Park administrative services to El Portal.

“We support the expansion of housing / facilities at El Portal as a preferable site for such administrative and operations facilities.” (Conservation Organization, Twain Hart, CA - #947)

Response: The Preferred Alternative in the *Final Yosemite Valley Plan/SEIS* proposes to relocate National Park Service and concessioner headquarters to El Portal. Specifics regarding this relocation can be found in Vol. IA, Chapter 2, Alternatives.

1177. Public Concern: The National Park Service should remove the sewage treatment plant from Rancheria Flat.

“Remove the old sewage treatment plant from Rancheria Flat. It sits on the oldest known place of human habitation in the Yosemite region. Not only does it embarrass the Government, but it shows poor respect for the present Native people in the area.” (Individual, Willcox, AZ - #853)

Response: With the exception of the No Action Alternative (Alternative 1), all alternatives in the *Final Yosemite Valley Plan/SEIS* call for removal of the abandoned sewage treatment plant at Rancheria Flat. The area would then be restored to a more natural condition to better preserve and protect the sensitive resources in that location.

WAWONA

1178. Public Concern: The National Park Service should not relocate Yosemite National Park headquarters or maintenance facilities to Wawona.

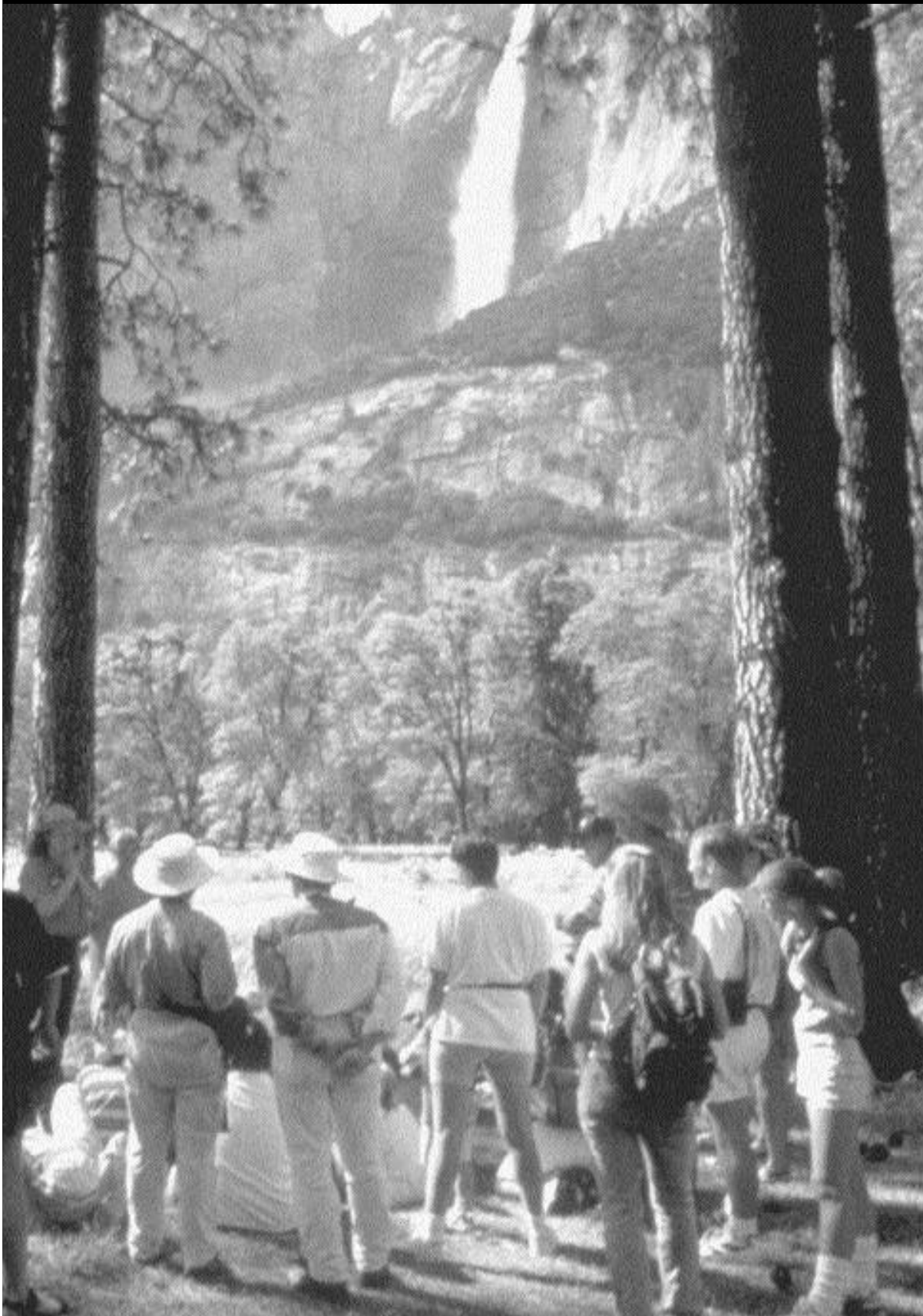
“The Park Superintendent recently wrote the Mariposa Board of Supervisors that his mandate from Congress was to keep Wawona a small rural community. Any relocation of Park headquarters or maintenance to Wawona would not be consistent with this mandate. The same goes for re-locating campgrounds to Wawona.” (Individual, Ridgecrest, CA - #1707)

Response: The *Yosemite Valley Plan* does not propose or consider relocating the park headquarters to Wawona.

In 1958, legislation was passed to establish the El Portal Administrative Site. Congress established the site in order to provide for the relocation of necessary facilities, utilities, and administrative services from Yosemite Valley to a location outside the boundary of the National Park. The *Yosemite Valley Plan* follows the intent of the 1958 legislation by proposing that headquarters be relocated to El Portal. Additionally, the *Yosemite Valley Plan* follows the lead of the 1980 *General Management Plan* that also calls for the relocation of the National Park Service and concessioner headquarters to El Portal.



*Response
Demographics*



Final
Yosemite
Valley
Plan

Supplemental EIS

Chapter 6 ~ Response Demographics

Introduction

Demographic coding allows managers to form an overall picture of who is submitting comments, where they live, their general affiliation with various organizations or government agencies, and the manner in which they respond. The database created during content analysis could also be used to produce reports focused on specific areas of concern linked to respondent categories, geographic areas, and response types. This was not done as part of the review of the *Draft Yosemite Valley Plan/SEIS*.

A total of 10,240 separate responses—in the form of letters, faxes, petitions, comment forms, and emails—were received on the *Draft Yosemite Valley Plan/SEIS* during the public comment period. Responses represent a total of 17,498 signatures (because some people sent in more than one comment letter, this does not equate to the number of people commenting). Although these numbers give a general picture of the commenting public, they should be interpreted with caution—those who responded do not constitute a valid random or representative sample of the general public. This information can provide insight into the perspectives and values of respondents; however, it does not necessarily reveal the desires of the larger society.

The consideration of public comment is not a vote-counting process. Every comment and suggestion has value, whether expressed by one or a thousand respondents. All input was considered, and the analysis team attempted to capture all relevant public concerns in the analysis process. For more information on the process used to tabulate the following demographic information, readers are directed to Volume III, Chapter 8, The Content Analysis Process, which includes a description of each stage of the process used to analyze and account for public comment on the *Draft Yosemite Valley Plan/SEIS*.

Geographic Representation of Response

Geographic information was tabulated for each letter, email, fax, petition or comment form during the course of content analysis. Letters and emails on the *Draft Yosemite Valley Plan/SEIS* were received from 48 states, the District of Columbia, the territory of Puerto Rico, and 13 foreign countries. A total of 7,789 responses, or 76 %, were received from California. The place of origin was unidentifiable for 1,455 responses (14 %), which were received in a format that did not reveal geographic origin. There were 968 responses from other states (9.6 %) and 38 from foreign countries (0.4 %). Each tally of responses reflects the number of respondents from a given location. However, if more than one person, each from different locations, submitted a one piece of correspondence, that piece of correspondence was included in the total for each location. For example, if two people submitted one letter, one person from California and one person from Alaska, the letter would be included in both the California and the Alaska total number of responses. Hence, the total number of responses submitted in the draft plan given in Table III.1.1 (10,240) is slightly lower than that included in Table III.6.1 (10,265).

Table III.6.1 - Geographic Representation of Response by Country and/or State
Summary of Public Comment, *Yosemite Valley Plan*

Country	State	Number of Responses
United States	Alaska	2
	Alabama	7
	Arkansas	7
	Arizona	49
	California	7,789
	Colorado	35
	Connecticut	13
	District Of Columbia	8
	Delaware	2
	Florida	49
	Georgia	24
	Hawaii	9
	Idaho	11
	Illinois	43
	Indiana	7
	Iowa	8
	Kansas	7
	Kentucky	4
	Louisiana	7
	Maine	10
	Maryland	22
	Massachusetts	28
	Michigan	26
	Minnesota	20
	Missouri	16
	Mississippi	4
	Montana	6
	Nebraska	4
	New Jersey	33
	New Hampshire	16
	New Mexico	14
	New York	67
	Nevada	46
	North Carolina	26
	North Dakota	0
	Ohio	38
	Oklahoma	5
	Oregon	44
	Pennsylvania	65
	Puerto Rico	1
	Rhode Island	7
	South Carolina	3
	South Dakota	0
	Tennessee	8
	Texas	52
	Utah	9
	Virginia	29
	Vermont	4
	Washington	59
	Wisconsin	26
	West Virginia	1



Country	State	Number of Responses
	Wyoming	2
Australia		4
Austria		1
Canada		6
Denmark		1
Finland		1
France		2
Germany		1
Japan		2
Netherlands		1
Philippines		1
Singapore		2
Sweden		1
United Kingdom		15
Unknown Geographic Location		1,455
Total		10,265

Regional Representation of Response

Within California, regional distribution of the comment responses was determined using the address zip code for each piece of correspondence received during the comment period. Of California responses, 5,237 (68 %) were received from just three regions of the State: the San Francisco Bay area (28 %), the Sacramento Valley (21 %), and the Greater Los Angeles area (19 %). There were 889 comments (11.4 %) from the San Joaquin Valley (northern and southern). Response from Yosemite National Park and the immediately surrounding regions generated 667 comments, 8.6 % of the California total.

Table III.6.2 – Geographic Representation of California Respondents by Region
Summary of Public Comment, *Yosemite Valley Plan*

State	Region	Zip Codes	Number of Responses
California	Northern California	95500-95599, 96000-96299	95
	Sacramento Valley	94200-94299, 95600-95999	1,644
	Northern San Joaquin	95200-95399 (excluding Tuolumne and Mariposa Counties, Yosemite, and El Portal)	385
	Southern San Joaquin	93200-93399, 93600-93899 (excluding Eastern Madera County)	504
	San Francisco Bay	94000-94199, 94300-95199, 95400-95499	2,188
	South Coast	93400-93499, 93900-93999	203
	Greater LA	90000-91899, 92600-92899, 93000-93199	1,472
	San Diego	91900-92199	323
	Desert South	92200-92599, 93500-93599 (excluding Mono County and “Eastern Sierra”)	172
	Eastern Sierra	93512, 93513, 93514, 93515, 93526, 93527, 93539, 93545, 93549, 93555, 93556	18
	Mariposa County	95306, 95311, 95325, 95338, 95345	81
	Eastern Madera County	93601, 93604, 93614, 93623, 93642, 93643, 93644, 93645	342

State	Region	Zip Codes	Number of Responses
	Tuolumne County	95309, 95310, 95314, 95321, 95327, 95335, 95346, 95347, 95364, 95370, 95375, 95379, 95383	52
	Mono County	93517, 93529, 93541, 93546	13
	Yosemite	95389	142
	El Portal	95318	19
	California – no zip code		136
Total			7,789

Organizational Representation

Responses were received from unaffiliated individuals, government representatives, and various organizations, including environmental, recreational, and church groups. Unaffiliated individuals accounted for 97 % (9,928 comments) of the total responses. Organization types were tracked for each letter, email, fax, or comment form encountered in the course of the content analysis.

Table III.6.3 - Number of Responses by Organizational Affiliation
Summary of Public Comment, *Yosemite Valley Plan*

Organization Field	Organization Type	Number of Responses
A	University or Professional Society	4
B	Business (speaking for or as the owner of a business)	46
C	County Government Agencies or Officials	14
E	National Park Service Employees	10
G	Federal Government Agencies or Officials	6
H	Recreational Groups (hikers, horse riders, bikers, etc.)	37
I	Individuals (no specific or identified affiliation)	9,928
K	All non-NPS Employees in Yosemite National Park (concessioner, etc.)	76
L	Other Non-Governmental Organizations (other than conservation)	41
N	International Agencies or Officials	0
O	Civic Groups (Kiwanis, Elks, Community Councils, etc.)	13
P	Conservation/Preservation Organizations	46
Q	Tribal Agencies or Officials	0
R	Religious Groups and Organizations (churches, etc.)	6
S	State Agencies or Officials	10
T	Town and City Agencies or Officials	3
Null	Unknown	0
Total		10,240

User Type

Responses were also categorized by user type based on how respondents identified themselves (e.g., “I am a rock climber”). The user type category includes fields for area residents, employees of particular businesses, and recreational users. Most comments (7,927 or 77 %) came from individuals who did not identify themselves as a particular type of user. Of the 23 % (2,313 comments) that came from respondents who self-identified, the largest groupings were as follows: long-time users (9 %); area residents residing in or adjacent to the Park (5 %);



educational groups and students (3 %); and stock users (2 %). The following user types were tracked for each letter, fax, email, or comment form processed in the course of the content analysis.

Table III.6.4 - Number of Responses by User Type (Self-Identified Only)
Summary of Public Comment, *Yosemite Valley Plan*

User Field	User Type	Number of Responses
A0	Area Residents Nonspecific (residents of Yosemite National Park, Yosemite West, or El Portal)	106
A1	Area Resident, employed by NPS	15
A2	Area Resident, employed by Yosemite Concession Services	95
A3	Area Resident, employed by Yosemite Institute	0
A4	Area Resident, employed by Yosemite Association	1
A5	Area Resident, employed by Pacific Bell	0
A6	Area Resident, employed by Medical Clinic	0
A7	Area Resident, Mariposa County	163
A8	Area Resident, Madera County	65
A9	Area Resident, Tuolumne County	20
A10	Area Resident, Mono County	2
A11	Area Resident, Merced County	3
B	Bikers	48
C	Campers	142
D	Educational Groups/Students	329
E	Businesses (economic/ entrepreneur)	36
F	Anglers	0
G	Winter Users (skiing, skating, etc.)	2
H	Hikers/other Foot Users	49
I	Photographers	8
K	Boaters (includes rafters & kayakers)	3
L	Lodge Users (e.g., Ahwahnee)	72
R	Rock Climbers	26
S	Stock Users (horses, goats, etc.)	224
T	Long-time Users/Multi-generational Users	895
V	Artists	8
W	Other Water Users (e.g. swimmers, snorkelers)	1
X	No Identified Type/Not Applicable	7,927
Null	Unknown	0
Total		10,240

Response Format

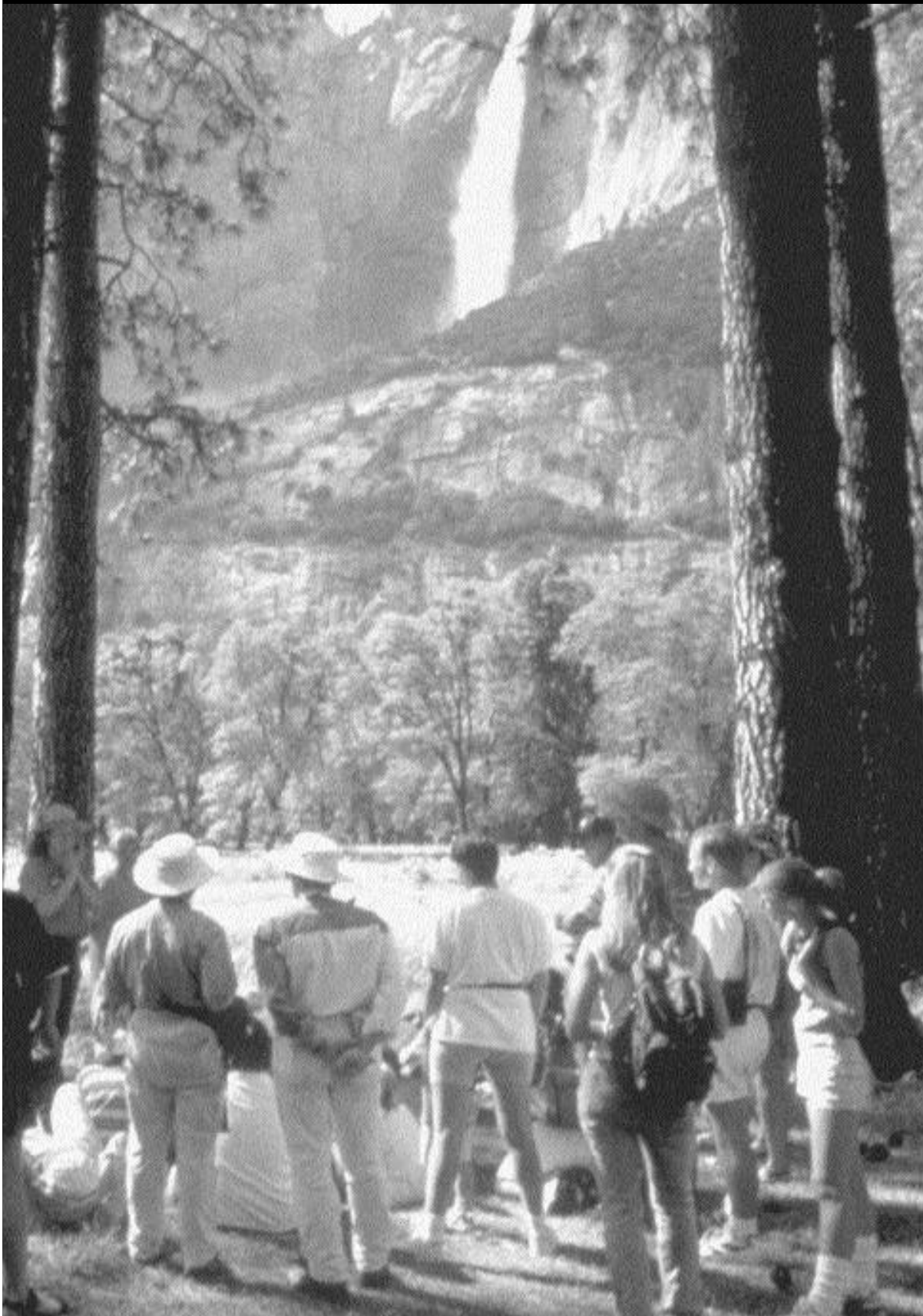
The final demographic summary presented here is a tabulation of response type. Table III.6.5 displays the number of public responses received in a specific format. A total of 56 % of responses came in the form of letters. Email was also widely used (30 %).

Table III.6.5 - Number of Responses and Signatures by Response Format
Summary of Public Comment, *Yosemite Valley Plan*

Response Format Number	Response Format	Number of Responses	Number of Signatures
1	Letter (mail or fax)	5,739	11,581
2	Email	3,045	4,348
3	Petition	3	93
4	Comment Form from Public Meetings	1,090	1,113
5	Public Meeting Transcripts	359	359
8	Telephone Transcripts	4	4
Total		10,240	17,498



*Organized
Response
Campaigns*



Final
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Supplemental EIS

Chapter 7 ~ Organized Response Campaigns

Introduction

A total of 3,741 out of 10,240 responses, or 37%, received during the public comment period for the *Draft Yosemite Valley Plan/SEIS* reflect the work of 17 organized response campaigns. These response campaigns generated email, postcards, newspaper coupons, and multiple letters. Seven of these campaigns each generated more than 100 responses, resulting in 3,325 comments, 89% of all organized responses; 3,042 of those (91%) came from California.

Responses from campaigns are classified as “forms.” A form is a response with identical content that is received from more than five people. In all cases a master form is entered into the database with all of the coded content information. All responses with matching information are then linked to this master form in the database with a designated master form number. If a response does not contain all of the information presented in a given form it is entered as an individual letter. If a response is identical except for some additional text, the additional text is coded and entered independent of the form content.

Table III.7.1 shows the total number of each form received and summarizes the issues presented in the various organized response campaigns.

Table III.7.1 – Forms
Summary of Public Comment, *Yosemite Valley Plan*

Name of Form	Number Received	Comments
1. Cut Auto Traffic	274	Supports park’s proposal to cut auto traffic, reduce development, and restore natural systems.
2. Threefold	8	Opposes removal of parking spaces and reductions in access; expresses concern over removal of low-cost lodging; believes plan will limit peoples’ enjoyment of the park.
3. Maximize Bicycling	40	Calls for modifying Alternative 2 to maximize bicycling: offer free community bikes, ensure sufficient lane width, convert Northside drive to multiuse non-motorized, construct a separate Class I path for novice riders, install secure bicycle parking, allow bike access to some shared trails, provide bike carriers on transit systems.
4. Reduce Auto Traffic	88	Supports NPS proposals to reduce auto traffic and restore natural systems. Key recommendations include the following: make Camp Six a day-use parking lot, remove bridges, do not construct new units at Yosemite Lodge, provide detailed implementation plan.
5. Reduce Auto Traffic and Move Administration	124	Supports NPS proposals to reduce auto traffic. Also recommends using clean and quiet buses, making restoration of natural resources a high priority, locating the day use parking lot at Camp Six, moving development out of valley, not rebuilding Yosemite Lodge, retaining 100 rustic units at Camp Curry, providing a detailed implementation plan.
6. Priceless Taft No	1287	Supports proposals to cut traffic and reduce development; opposes parking facility at Taft Toe. Believes day use parking lot should be located at Camp 6 and shuttle bus system should use clean, quiet technology. Supports restoration of natural systems and removal of bridges.

Name of Form	Number Received	Comments
7. Chambers of Commerce	166	Endorses chambers of commerce position opposing all four alternatives in the Yosemite Valley Plan.
8. Stop	304	Stop the Yosemite Valley Plan.
9. Vote for Alternative 5	20	Supports Alternative 5, but would prefer Alternative 1. Recommends the following modifications to Alternative 5: retain Housekeeping sites; don't add rooms at Yosemite Lodge; don't add RV hook-ups; leave Mountain Room, Mountain Shop and equipment rental, village garage, and village store as is; don't replace service station; move day parking outside park; leave Yosemite Falls area as is; don't rebuild river campgrounds; remove fire pits at Housekeeping Camp but leave the sites.
10. Detailed Description of Implementation	39	Supports NPS proposals to reduce auto traffic, restore natural habitat, remove parking spaces and unnecessary development. Also recommends removing bridges, temporarily locating the day use parking lot at Camp Six, not rebuilding Yosemite Lodge units, retaining 100 rustic units at Camp Curry, providing a detailed implementation plan.
11. Coming to Yosemite for 20 Years	27	Supports NPS proposals to reduce auto traffic. Also recommends using clean and quiet buses, making restoration of natural resources a high priority, locating the day use parking lot at Camp Six, moving development out of valley, not rebuilding Yosemite Lodge, retaining 100 rustic units at Camp Curry, providing a detailed implementation plan.
12. John Muir Discovered the Valley	183	Supports Alternative 2 with the following modifications for horses: retain and relocate stables, retain guided rides; eliminate the corral and add large, reserved parking areas. Believes that without these modifications, only alternatives 5 and 1 are acceptable. Opposes Alternative 3.
13. Opposed to Supporting Concessionaire	4	Opposes further development in the Valley, supporting the concessionaire, the construction of any new motel/hotel additions. Supports the replacement of campsites lost in the flood, the development of electric transportation systems, the elimination of diesel buses. Opposes all alternatives; believes Alternative 2 doesn't go far enough to protect the Valley.
14. Alternatives for Stock	67	Supports Alternative 2 with the following modifications for horses: retain and relocate stables, retain guided rides; eliminate the corral and add large, reserved parking areas. Believes that without these modifications, only alternatives 5 and 1 are acceptable. Opposes Alternative 3. Includes a table showing effects of alternatives on stock use.
15. Welcome the Proposals	1002	Supports park's proposal to cut auto traffic, reduce development, and restore natural systems. Believes day-use parking should be located at Camp Six.
16. Vote.com	89	Supports limiting the number of cars in Yosemite.
17. Please Do Your Job	19	Expresses support for more equestrian facilities in the Valley: horse campsites, additional parking in staging area, access to water and campsites from staging areas. Also calls for retention of stables, development of a reservation system for horse facilities.
Total: 3,741		



Petitions

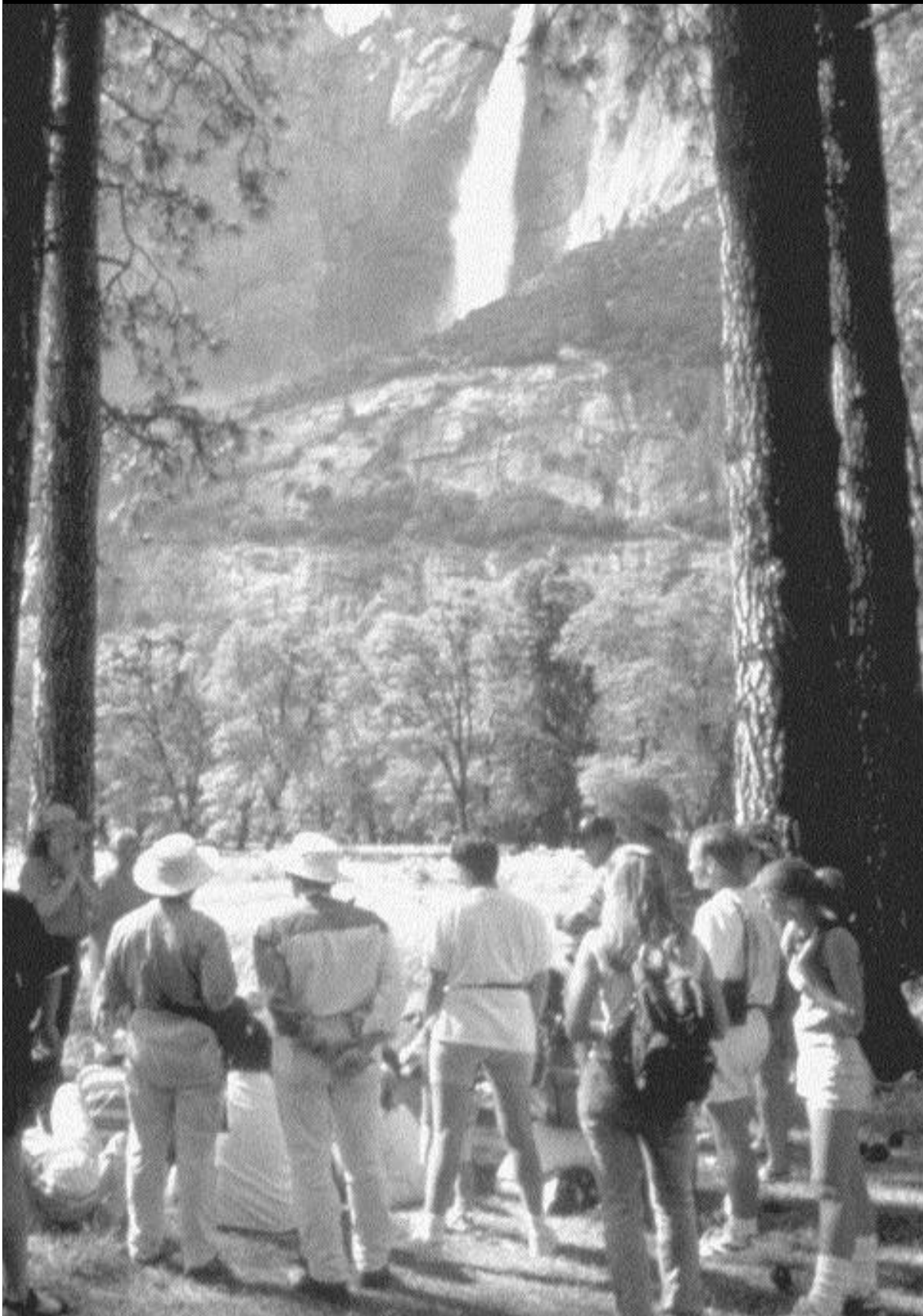
Organized responses signed by more than five members of the public are treated as petitions. In cases where individual signatories included their addresses, they were assigned individual identification numbers in the database linking them to the text of the petition. This process is identical for form letters. Where multiple signatories did not include their addresses, the response, although treated as a petition for demographic purposes, was directly linked only to the name and address of the person who delivered or mailed the original response. In cases like this, the total number of signatures was counted and entered into the demographics as well. During the comment period for the *Yosemite Valley Plan*, three petitions were received and linked to 93 signatures, mostly from California. Table III.7.2 shows the number of signatures on each petition and summarizes major concerns.

Table III.7.2 – Petitions
Summary of Public Comment, *Yosemite Valley Plan*

Letter #	Number of Signatures	Originator of Petition, Location	Comments
2337	22	No group identified; most signatures from California addresses.	Opposes the closure of Housekeeping Camp or any reduction in the number of units.
3544	19	No group identified, all addresses from California.	Supports the preservation of drive-in campsites and the restoration of some river sites if possible.
3654	52	Petition circulated in Housekeeping Camp during Memorial Day weekend, 2000.	Wants the National Park Park to choose Alternative 1. Supports retaining bridges and range of camping opportunities including campgrounds, Housekeeping Camp, Camp Curry.
	Total: 93		



*The Content
Analysis
Process*



Final
Yosemite
Valley
Plan

Supplemental EIS

Chapter 8 ~ The Content Analysis Process

Introduction

Public comments on the *Draft Yosemite Valley Plan/SEIS* were documented and analyzed by the United States Forest Service, Content Analysis Enterprise Team (Content Analysis Enterprise Team) in Missoula, Montana, using a process called content analysis. This is a systematic method of compiling, categorizing, and capturing the full range of public viewpoints and concerns regarding a plan or project. Content analysis is intended to help park management to clarify, adjust, or use technical information to prepare the *Final Yosemite Valley Plan/SEIS*. Information from public and employee meetings, letters, emails, faxes, and other sources is all included in this analysis.

In the content analysis process used for this project, each letter is given a unique identifying number, which allows analysts to link specific comments to original letters. All respondents' names and addresses are then entered into a project-specific database program, enabling creation of a complete mailing list of all respondents. The database is also used to track pertinent demographic information such as the geographic location of the responder, the type of response, and the type of special interest group or federal, state, county, local government, if any, responding.

At each stage of the process, all input is considered and reviewed by two analysts. Each response is read, then discrete comments in each are identified by category and then entered verbatim into the comment database. All comments in each category in the database are then reviewed and sorted into concerns and themes used to write public concern statements. In preparing the final summary report of the analysis, public concern statements are reviewed again using database printouts. These reports track all input and allow analysts to identify a wide range of public concerns and analyze the relationships between them. The final summary report includes, for each category of public comment, a narrative description, the public concern statements addressing the proposal, and supporting sample quotes, all arranged by topic.

For this project, a National Park Service team of 14 Yosemite employees and consultants supported the Content Analysis Enterprise Team in the content analysis effort. After receiving training, the Yosemite staff spent several weeks working in Missoula. Of the more than 10,000 letters, email, faxes, and public meeting transcripts read and coded, over 6,000 were read and coded by National Park Service staff (the balance of letters was read and coded by the Content Analysis Enterprise Team). The National Park Service team also contributed to the data entry effort and provided the Content Analysis Enterprise Team with background and site-specific information for their report preparation. Using original letters and the comment database, Content Analysis Enterprise Team staff identified public concerns and prepared the analysis report, *Summary of Public Comment: Yosemite Valley Plan Draft Supplemental Environmental Impact Statement* (USFS 2000b).

After the Content Analysis Enterprise Team delivered their final report on August 8, 2000, it was discovered that additional letters needed to be included in the public comments and further analysis was undertaken (see Vol. IB, Chapter 5, Consultation and Coordination). These were also read and analyzed by National Park Service staff and the Content Analysis Enterprise Team and the resulting concerns considered while developing the *Final Yosemite Valley Plan/SEIS*.

After National Park Service and Content Analysis Enterprise Team staff completed this work, the Content Analysis Enterprise Team issued an update, *Addendum – Summary of Public Comment: Yosemite Valley Plan Draft Environmental Impact Statement* (USFS 2000b), *July 8 to July 14, 2000 Letters*, that was incorporated as Appendix I into their final report.

It is important to understand that the content analysis process makes no attempt to treat comments as votes. In no way does content analysis attempt to sway decision makers towards the will of any majority. There are many reasons for this, the primary one being a desire to prepare the *Final Yosemite Valley Plan/SEIS* in a way that best meets the purpose and need of the *Yosemite Valley Plan* and serves the interests of all the people—not just some. Content analysis ensures that every comment is considered at some point in the decision process.

Finally, the process of content analysis and the resulting summary report are not intended to replace comments in their original form. Rather, they provide a map to the letters and other input available to park planners and managers as they prepare the *Final Yosemite Valley Plan/SEIS*. All of this information is on file at the Yosemite National Park Research Library in Yosemite Valley.

What follows is an abbreviated description of the process used by the Content Analysis Enterprise Team to analyze public comment on the *Draft Yosemite Valley Plan/SEIS*. For a more detailed description, refer to their narrative summary report (USFS 2000b). For further information on this process, contact the Content Analysis Enterprise Team at United States Forest Service, Content Analysis Enterprise Team, 200 E. Broadway, Room 300, Missoula, Montana, 59807.

Coding

Coding public comment lies at the heart of the analysis process. Coding is the act of reading a public comment and breaking it down into different areas of concern. A letter may address many different things; the challenge is to capture all of these concerns and separate them into subject areas used in the database. The database can then be used to call up all comments regarding a specific area of concern.

It is important in this process that coders capture the emotion and emphasis of a letter. The “I think” or “I want” statement, alone, does not provide enough information. Coders search the letter for the “why” and “because.” The explanations for why people think and want what they do are the true essence of their opinions, and are what allow park planners and managers to understand the point of the comment and evaluate it in the context of other information bearing on the issue in question. Thus, to accurately reflect a person’s sentiments, it may be appropriate to code a large portion of a comment. Analysts code as much as necessary to capture why someone feels a certain way.

Team members use the most specific coding category possible. However, they do not split paragraphs when doing so would result in losing the full meaning or emphasis of the comment. When in doubt, coders lump rather than split so that each concern will stand by itself and make sense.

Overlap or gray areas between codes do occur. In these instances coders talk to co-workers and arrive at a consensus as to where comments will be coded.



Coding Structure

Coding categories, which facilitate sorting and organizing large amounts of information, are derived directly from letters, the Yosemite planning team, and from earlier public comment on Yosemite plans (see *Summary of Public Comment: Yosemite Valley Plan-Draft Supplemental Environmental Impact Statement*, Appendix G, “Yosemite Valley Plan Coding Structure,” USFS 2000b). The coding structure is arranged numerically. For example, all comments addressing the planning process for the *Yosemite Valley Plan* are assigned code numbers between 10000 and 15900, comments referencing plan alternatives between 20000 and 20500, and those related to cultural resources between 34000 and 37000. A comment specific to a particular resource, historic bridges, for instance, is coded to a specific number within the appropriate topical range. That code number defines the “bin” in the database where all similar comments are “collected.”

When necessary, bullet statements or separate sentences are split out from within a paragraph and assigned different category codes. When needed to make sense, the text introducing a series of ideas or bullet statements is included with each when entered into the database. For example: “I feel you must strengthen the policy in the following ways or it will be ineffective: A . . . ; B . . . ; and, C” The lead-in sentence is important in understanding the bullets. A note in the margin alerts data-entry personnel to type the lead sentence before each separate statement.

First and Second Reading

Each letter is read twice. The first reader codes the letter and initials the bottom of the first page. The second reader either concurs with the coding or revises the coding after discussing changes with the first reader. The second reader also uses colored highlighter markers to separate the different comments. This makes it easier for data-entry personnel to visually track comments. The second reader also initials the bottom of the first page. Two sets of initials indicate that a letter is ready to be entered into the database.

First Coder’s Responsibilities

- Identify demographic information for the letter (see below) and assign the proper codes in a header at the top of the letter for data entry.
- Break out sentences, paragraphs, or other sections of text expressing thoughts and code them according to the coding guide.
- Assign any applicable alternative codes (see below) for gathering other pertinent information.
- Initial bottom of page.

Second Coder’s Responsibilities

- Check that the information in the demographic header is correct.
- Check that the correct alternative codes have been assigned.
- Double check the basic comment coding. If the second coder disagrees, it is taken back to the first coder, the coding discussed, and a consensus formed. If agreement cannot be reached, it is taken to the team leader for resolution.

- Highlight each discrete comment.
- Add initials at bottom of page.

Demographic Coding

Demographic codes, of the types listed below, identify where respondents live, their general affiliation to various organizations or government agencies, and the manner in which they respond. A report summarizing this information allows managers to form an overall picture of who is offering public comment. Once this information is identified in a letter, the appropriate demographic codes are written as a “header” at the top center of the first page of each letter.

The demographic information in the database can be used to isolate specific combinations of information about public comment. For example, as part of the review process for the *Draft Yosemite Valley Plan/SEIS*, the public comment database for the *Draft Merced River Plan/EIS* was searched for an alternative code indicating a concern related to Yosemite Valley planning. The resulting report allowed park planners to ensure that such comments were considered in developing the *Final Yosemite Valley Plan/SEIS*. If desired, demographic coding combined with the public comment subject categories allows managers to do more complicated analyses that focus on specific areas of public concern linked to type of respondent, geographic area, and response method. This was not done for Yosemite Valley planning.

Number of Signatures (authors)

The number of signatures is recorded for each response. Email messages count as one signature, even though there is no actual signature. If a letter has no signature, the letter will still be counted as having one signature. To be counted as two or more signatures there must be a distinction between the signatures. If Jane Smith signs her name and her husband’s name, John Smith, only one signature is generally counted.

Response Type

- Letter
- Email
- Petition
- Comment Form from Public Meetings
- Public Meeting Transcript

Petitions

This code is used only if the letter has five or more signatures of unrelated individuals or organizations. The number of signatures is counted and the response type “petition” is used. If complete addresses are included, each signature and associated address is entered into the database with its own unique mail identification number (Mail ID) and letter identification number (Letter ID) linked to the petition. Signatures without addresses are counted towards the number of signatures for the petition but do not receive a unique mail identification number.



Petitions or other letters with multiple Mail ID's reflect the number of signatures. For example, a petition with 1,200 signatures will have that number in the header. If a multiple Mail ID petition has different organization types, the number of signatures is counted for each similar organization type.

Immediate Attention

An additional header code is reserved for letters that may be of special interest to the planning staff at Yosemite National Park. (See *Summary of Public Comment: Yosemite Valley Plan Draft Supplemental Environmental Impact Statement* Appendix C, "Immediate Attention" (USFS 2000b) for more information on the method of handling response required, also known as "red flag" letters, as well as the Immediate Attention (or "Red Tag") Report. The categories of "Immediate Attention" types include the following:

- *Notice of appeal, litigation, or threat of harm* - Any response that describes intent to appeal an action or bring legal suit to bear on the agency. Threats of physical harm to project or agency personnel are marked in this category.
- *Freedom of Information Act (FOIA)* - Official requests for information and documentation under the FOIA.
- *Provides proposals for alternatives* - Any letter that delineates an alternative to the proposed action. Does not include critiques of alternatives or partial changes of existing alternatives. Must be substantive letters.
- *Especially Substantive letters* - These letters provide readers with a well-written analysis of the issues. They are informative and help frame questions.
- *Government entities*- Letters from elected officials and employees of federal, tribal, state, county, and city governments. Official correspondence only.
- *Extension of Comment Period* - Requests for an extension of the comment period.
- *Comments on the compliance and/or compatability between the Merced River Plan & the Yosemite Valley Plan*
- *Complaints/concerns about the cost, size or receipt of the Final Yosemite Valley Plan SEIS*
- *Nongovernment organizations*- Letters written to express the view of Nongovernmental organizations, by the organizations not by their members.

User Type

A series of codes used to identify respondents that explicitly characterize themselves in some particular way as a commenter on Yosemite National Park (for example, "I've been visiting Yosemite National Park for over 40 years, and I think..." is a long-time visitor; "As a camper [or ...climber, ...resident of Mariposa County, ...member of the Citizens to Save the Yosemite Onion, etc.], I think you should..." is a camper, climber, etc.).

Form Letters

The term “form letter” is used to refer to comments received under separate letterhead that are identical in content. Generally, the text of these letters is 100 percent identical; however, in some cases and at the discretion of the coder, letter text may paraphrase the content of a form letter with no changes in topics discussed, etc. For a complete description of the form letters received in this project see *Summary of Public Comment: Yosemite Valley Plan Draft Supplemental Environmental Impact Statement*, Appendix D, “Organized Response” (USFS 2000b).

Letters with largely, but not entirely, identical text are known as “form letters with additional comment.” As an example, this term describes a letter of six paragraphs where one paragraph differs from a five-paragraph form letter identified as “form letter 1.” The five “form” paragraphs are coded like the form and only the “additional comment” is coded separately.

- Form Letter = identical or very closely paraphrased
- Form Letter with Additional Comment = identical or very closely paraphrased with one or more additional comments.

Processing Form Letters

Each form letter is given a unique number and a name descriptive of the letter’s content. An Information Systems Specialist (ISS) Team Leader assigns this number and name. Each form letter receives a number preceded by the letter “f.” Thus, f2 in the header means Form Letter #2 - “River Lovers United.” The ISS Team Leader maintains a list of Form Letter numbers and titles for each project. Only form letters receive an f (for “form”) number in the header.

Information Requests

Requests for additional information from the National Park Service that are not Freedom of Information Act requests are recorded in this category and marked for quick identification by a blue flag.

For the *Yosemite Valley Plan* there were four types of information requests:

- To be added to Yosemite’s mailing list – and nothing to code, mailing list only
- To be removed from Yosemite’s mailing list
- For information that can’t be answered in the *Draft Yosemite Valley Plan/SEIS*
- For copies of the *Draft* or *Final Merced River Plan/FEIS* or *Yosemite Valley Plan/SEIS*

Alternative Fields

Following the subject code (from the coding structure) are two specific “alternative” fields. The first references plans or projects referred to in a comment; the second notes specific locales when identified as a focus of concern.

The following is an example of a complete margin code for one discrete comment on the *Draft Yosemite Valley Plan/SEIS* that speaks to the purpose or need for an action from the Concession Services Plan in reference to concessions facilities at Curry Village:



PLANN-11000-B-A9

In this example, PLANN is the subject code for “Planning Process and Policy,” 11000 is the category code for “Purpose and Need for Action,” B indicates that the comment refers the Concession Services Plan, and A9 refers to Curry Village. For a complete description of different Alternative Codes used for the *Draft Yosemite Valley Plan/SEIS*, see *Summary of Public Comment: Yosemite Valley Plan – Draft Supplemental Environmental Impact Statement*, Appendix F, “Content Analysis Process” (USFS 2000b). To review the coding structure, see Appendix G of the same Report.

List of Preparers

Summary of Public Comment - Yosemite Valley Plan Draft Environmental Impact Statement
(USFS 2000b)

Content Analysis Enterprise Team – Missoula Group

Project Coordination

Michael Schlafmann, Project Manager
Ray Vinkey, Team Leader

Writers/Coders

Buell Whitehead
Leaf Magnuson
Holly Schneider
Julie Lue
Barbara Ensor
Lisa Naas
Dave Strohmaier
Tyne Doty
Charles Ellis
Myron Holland
Roger Poirier
Mic X Metz
Jack Rowan
Steve Slack

Program Coordination

Jody Sutton, Coordinator
Ginger Hamilton, Personnel
Linda Thompson, Office Management Assistant
James MacMillen, Contracting

Information Systems Coordination

Shari Kappel, Coordinator

Kelly Gillette, Computer Programming and Support Specialist

Kelly Speer, Information Systems Assistant

Information Systems

Elise Bailey

Angela Concepcion-Willmott

Rich Darne

Kay Flink

Barbara Gibson

Sue Gibson

Katie Hatrock

Ted Hughes

Meghan Hunter

Ann Jensen

Lee LaRoche

Teresa Molitor

Verena Rattler

Shanna Robison

National Park Service – Assisting Staff and Consultants

National Park Service Project Coordinator

Jerry Mitchell, YNP/Superintendent's Office

Letter Coding

David Ashe, YNP/Protection

Leslie Boughton, URS/BRW (YNP Consultant)

Leslie Carter, YNP/Protection

Sean Flynn, YNP/Concessions

Johanna Gehres, YNP/Maintenance

Susan Gonshor, YNP/Interpretation

Mark Harvey, YNP/Protection

Jessica Overmohl, URS/BRW

Deb Schweizer, YNP/Protection

Michael Thornton, YNP/Administration

Information Systems

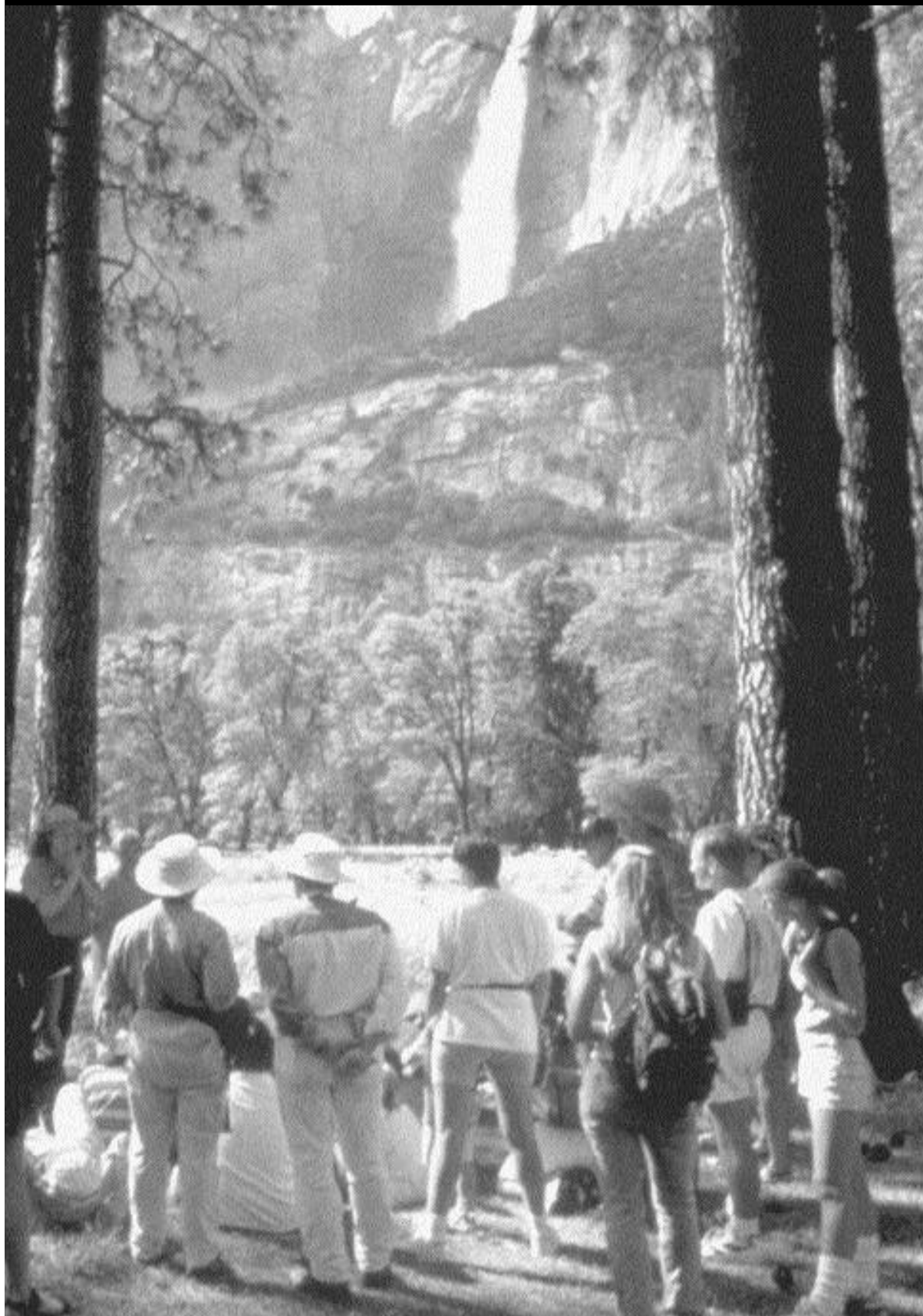
Teri Angst, URS/BRW

Gina Bissmeyer, YNP/Project Management

Rose Laughter, YNP/Resources Management



*Comment
Letters
from
Federal and
State Agencies
and Tribes*



Final
Yosemite
Valley
Plan

Supplemental EIS

Chapter 9 ~ Comment Letters from Federal and State Agencies and Tribes

**Advisory
Council On
Historic
Preservation**

RECEIVED

JUL 31 2000

YOSEMITE NATIONAL PARK

The Old Post Office Building
1100 Pennsylvania Avenue, NW, #809
Washington, DC 20004

July 25, 2000

David A. Milhalic
Superintendent
National Park Service
United States Department of the Interior
P.O. Box 577
Yosemite National Parks, CA 95389

RE: *Draft Yosemite Valley Plan and Supplemental Environmental Impact Statement (SEIS)
for Yosemite National Park, CA.*

Dear Mr. Milhalic:

Thank you for seeking our review and comment on the referenced plan. We appreciate the time and effort that you and your staff spent preparing such a comprehensive document to guide the future management of Yosemite National Park. To assist you, we offer the following comments.

The Council supports the five broad goals established in the Yosemite General Management Plan (GMP) that serves as the framework for the Draft Valley Plan. We particularly commend the park for acknowledging the protection of Yosemite's cultural and natural resources as one of the highest priorities for the future management of the Yosemite Valley. In addition, the Council appreciates the park's recognition of the reality that achieving every goal in the GMP to its fullest extent is not possible based on new data collected since the development of the GMP in 1980 and societal changes in the perception of what park resources are valuable. We also believe the plan adequately explains the Park's Section 106 responsibilities resulting from the implementation of the Draft Valley Plan in accordance with the 1999 Programmatic Agreement (PA) among Yosemite National Park, the California State Historic Preservation Officer, and the Council.

Each alternative contains positive elements that will benefit the park, however, we are concerned about some aspects of the proposed plan. We believe the GMP establishes worthy management goals for the park, but the alternatives proposed in the draft plan do not appear to cover a wide range of approaches for achieving those goals. From a cultural resources perspective, the end result of each alternative is the same, with slight variations for the number of historic properties that will be adversely affected. We believe the alternatives should provide a broader range of options for protecting cultural resources in addition to natural resources, since the plan identifies the protection of both as a priority. Common to all of the alternatives is the perception that

various cultural resources, such as historic bridges and cabins, will be sacrificed in order to restore natural resources in the valley. The Council, therefore, recommends that the draft plan address measures taken to avoid adverse effects to cultural resources, as called for in Stipulation VIII of the 1999 PA and in keeping with the stated purpose of the Valley Plan. Section 110(a)(1) of the National Historic Preservation Act requires all Federal agencies to use, to the maximum extent feasible, historic properties available to the agency. In light of this requirement, the Council recommends that the park examine the potential adaptive use of historic properties in Yosemite Valley as it continues to refine the alternatives included in the Draft Valley Plan. This could include, as a last resort, moving historic buildings and structures when no other option exists for preserving these properties in place, rather than demolishing them with the intent to construct new facilities.

Another general concern of the Council involves the proposed mitigation for historic properties in Yosemite Valley as described in Appendix E of the draft plan. Although the PA allows for the use of standard mitigation measures, we encourage the park to employ more creative mitigation measures for historic properties of significant interest to the public that will be adversely affected. Recordation is a worthy activity, however, we prefer that Yosemite focus more of its mitigation efforts on interpretive solutions to generate greater public benefit.

Regarding the treatment of specific historic properties as described in the Draft Yosemite Valley Plan, the Council also would like to provide you with some recommendations for your consideration. We question to what extent retaining the Superintendent's House impedes the park's ability to meet the stated goals of the GMP. The relatively small size of the building would hardly prevent the overall restoration of natural resources in that area. The Council realizes that the Superintendent's House is located in a flood zone, nevertheless we encourage the park to investigate the feasibility of rehabilitating the residence and taking measures to minimize damage from future flooding. Based on the amount of proposed new construction in the draft plan, the park should determine what, if any, adaptive use of the building would be appropriate. If no plausible methods exist for protecting the house against flooding the park should examine the possibility of moving the building to a safer location in close proximity to the house's current site.

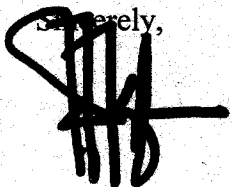
In addition to our concern over the need to remove the Superintendent's House, it is also unclear whether or not the removal of any historic bridges is necessary to meet the goal of allowing natural processes to prevail in the valley. In our view the Draft Yosemite Valley Plan does not adequately explain the impacts associated with the retention or removal of the historic bridges. We would appreciate clarification on the basis for which the park determined the number of bridges that would be removed under each alternative. In the *Actions Common to all Action Alternatives* section of the *Executive Summary*, the park discloses its plan to conduct a visitor experience and resource protection study to be completed within five years of a Record of Decision. The park goes on to state that the data collected from this study will be used to preserve and protect Yosemite's cultural and natural resources. It is the Council's belief that this study would prove more beneficial if completed prior to demolishing any historic bridges, allowing the results of the study to be considered in determining if the removal of the bridges is necessary to maintain or enhance visitor experience and resource protection. Therefore, we

recommend that the proposed demolition of historic bridges in the valley be excluded from the alternatives in the draft plan until the referenced study is completed.

Other historic properties for which we would like to offer specific comments include Yosemite Village and Camp Curry Historic Districts and the historic orchards. The loss of up to thirteen historic buildings in Yosemite Village Historic District seems severe. An evaluation of potential reuse of these buildings should be undertaken, particularly in view of the proposal to construct new emergency medical facilities and a fire station within Yosemite Village. We are also concerned about the loss of 277 tent cabins, the majority of which make up the Camp Curry Historic District. Because these tent cabins represent, "the most significant and intact tent cabin complex left in the National Park System" (Executive Summary, 3-15), the Council advocates a less comprehensive plan for the demolition of these cabins that would remove only those cabins located in potentially hazardous areas due to rock slides. The Council also suggests that the park preserve a representative sample of one of the historic orchards located in the valley so that this component of the cultural landscape will not be lost for future generations.

Finally we are pleased that each of the alternatives provides for the creation of an Indian Cultural Center. The Council supports the park's continuing efforts to consult with tribes regarding setting aside areas for traditional uses in Yosemite National Park pursuant to the draft plan and the PA.

Thank you for providing us with an opportunity to review and comment on this plan. If you have any questions regarding these comments, please contact Jane Crisler at (303) 969-5110 or via e-Mail jcrisler@achp.gov.

Sincerely,


Don L. Klima
Director
Office of Planning and Review

JOHN T. DOOLITTLE
4TH DISTRICT, CALIFORNIA

DEPUTY WHIP

COMMITTEES:
GOVERNMENT REFORM

RESOURCES
CHAIRMAN—SUBCOMMITTEE ON
WATER AND POWER

TRANSPORTATION AND
INFRASTRUCTURE

JOINT ECONOMIC COMMITTEE



Congress of the United States
House of Representatives

June 30, 2000

YVPD 4435
1526 LONGWORTH HOUSE OFFICE BUILDING
WASHINGTON, DC 20515-0504
(202) 225-2511

2130 PROFESSIONAL DRIVE, SUITE 190
ROSEVILLE, CA 95661-3738
(916) 786-5560
(800) 232-1336

Doolittle@mail.house.gov
<http://www.house.gov/doolittle>

RECEIVED

JUL 3 2000

Mr. David Mihalic
Superintendent
Yosemite National Park
Post Office Box 577
Yosemite, CA 95389

CAET RECEIVED

JUL 06 2000

YOSEMITE NATIONAL PARK

Dear Superintendent Mihalic:

I am writing to express several concerns that I have regarding your recently released Draft Yosemite Valley Plan (YVP). While I appreciated our recent meeting and the opportunity to share these views with you personally, please accept this letter as my official comments on the National Park Service's preferred management alternative for Yosemite Valley.

As one of only two Members of Congress representing Yosemite National Park, I have a special interest in preserving this national treasure for future generations to enjoy. However, I believe very strongly that we should seek to accomplish that objective without compromising the visitor experience and without unnecessarily impacting the economies of the outlying gateway communities. Unfortunately, it is in these two specific areas that I believe the preferred alternative falls short.

First, I have serious concerns regarding the proposed number of parking spaces in Yosemite Valley that would be eliminated under the preferred alternative. Like you, I agree that at times Yosemite Valley experiences severe traffic congestion. Such congestion is neither good for the park, nor the visitor. However, it is my understanding that congestion of this nature only exists a few days a year. While it is clear that for those days a different, more efficient transportation management strategy is needed, I believe that permanently reducing the number of parking spaces to 550 would only result in unnecessarily hampering the ease of visitation for many day use travelers during times of the year in which visitation does not result in traffic congestion. I have an appreciation for how difficult it is to develop an adequate solution to this specific problem. As such, I look forward to working with you in identifying other alternatives that eliminate congestion while preserving auto touring as a viable means of visiting the park.

Second and similarly, I object to the severe reduction in the number of overnight accommodations that would be available under your preferred alternative. I am sure you would agree that much of the appeal to Yosemite Valley is one's ability to actually spend the night in one of the

Superintendent Dave Mihalic
June 30, 2000
Page Two

most beautiful places in the world. In fact, my first memory of Yosemite National Park was camping with my parents on the Valley floor. Consequently, I strongly object to efforts that would place severe limitations on the ability of others to have a similar experience.

As you know, the preferred alternative calls for an almost 40% reduction in overnight accommodations, much of which is proposed under the guise of flood management. As one who has been very supportive of the Park Service's efforts to obtain federal funds to repair damage after the 1997 floods, it is disheartening to me to now see those appropriations being used to impede the visitor's ability to stay in Yosemite Valley overnight.

Third, I join many of my constituents in objecting to the removal of the Sugar Pine, Stoneman and Housekeeping bridges from Yosemite Valley. As I mentioned to you in our meeting, I believe very strongly that these bridges are an important and valued historical attribute of Yosemite National Park and that all efforts should be made to preserve them as part of any future management of Yosemite Valley.

Fourth, I am very much opposed to the removal of the horse stables from the Valley and the elimination of commercial trail rides. As one who has personally utilized these stables, I can attest to the enjoyable experience they provide to many visitors every year. One worthy management objective should be to diversify the types of experiences one can have in Yosemite Valley, not eliminate them. Clearly, removing the horse stables is in conflict with that objective.

Finally and most importantly, what has been most disconcerting to me has been the manner in which the Clinton Administration has attempted to force feed this proposal to the people of this country. For Interior Secretary Bruce Babbitt to deny any extension to the diminutive time frame he has allowed the American people to comment on a plan that has been in the works for 20 years is a complete disgrace and an affront to the very democratic system he supposedly espouses. I find it appalling that I received in my office a copy of the Record of Decision on the Merced River Plan – a plan that is critical to the implementation of any management plan of Yosemite Valley – a mere four days before the expiration of the comment period on the YVP. Needless to say, neither my constituents nor I have had ample opportunity to fully read, comprehend and comment on a plan that will drastically change the way Yosemite National Park is managed in the future. I hope that, in the future, decisions that are so critical to Yosemite National Park and to its outlying communities will be made with the benefit of a more deliberate and adequate public comment process.

Overall, I believe the preferred alternative contains many proposals that would result in a significant impact to the ability of visitors to enjoy Yosemite National Park. As we have seen in

the past, when that visitor experience is eroded, the park, the public, and the economies of the outlying gateway communities are ultimately compromised. In my judgement, this result is

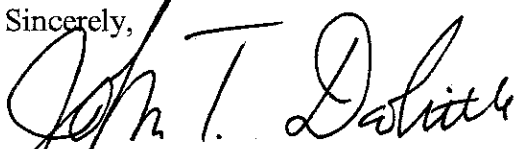
4435

Superintendent Dave Mihalic
June 30, 2000
Page Three

unnecessary, and I would encourage you to seek other alternatives that strike a more appropriate balance between visitor experience and protection of the park.

Please let me express my appreciation for all of the work that you and your staff have personally done to develop the YVP. While we may disagree on many of the plan's proposals, preserving Yosemite National Park for future generations to enjoy is an objective we both share. As such, I look forward to working with you in the future in developing and implementing a management plan that protects both Yosemite and the experience of those who choose to visit it.

Sincerely,

A handwritten signature in black ink, appearing to read "John T. Doolittle". The signature is fluid and cursive, with a large, sweeping initial "J".

JOHN T. DOOLITTLE
U.S. Representative

GEORGE RADANOVICH
19TH DISTRICT, CALIFORNIA



123 CANNON HOUSE OFFICE BUILDING
WASHINGTON, DC 20515-0519
(202) 225-4540
FAX: (202) 225-3402

COMMITTEE ON BUDGET

COMMITTEE ON
INTERNATIONAL RELATIONS

COMMITTEE ON RESOURCES

U.S. House of Representatives
Washington, DC 20515-0519

2377 WEST SHAW, SUITE 105
FRESNO, CA 93711
(559) 248-0800
FAX: (559) 248-0169

<http://www.house.gov/radanovich/>

June 23, 2000

Superintendent David Mihalic
Yosemite National Park
P.O. Box 577
Yosemite, CA 95389

Y-2951

Dear Dave:

This letter follows several conversations that we have had over the past month concerning the Draft Yosemite Valley Plan and current thinking regarding the future of Yosemite Valley. I have reviewed the documents that you have provided to me and my staff, and have discussed issues concerning the park with various constituents and with advisors of mine who are familiar with these documents and with your planning efforts.

PLANNING EFFORTS

As an overall statement, I want to reiterate my appreciation for all of the hard work and dedication shown by you and park staff in developing the *Draft Yosemite Valley Plan* (Valley Plan) and the *Merced Wild and Scenic River Draft Comprehensive Management Plan/Environmental Impact Statement* (River Plan). I know that developing complex documents such as these, and then providing public opportunity for input is not an easy process.

The confusing planning process we have all participated in since the 1980 General Management Plan has understandably baffled the public. I have received numerous comments from constituents who are otherwise knowledgeable about park issues who do not understand the interrelationships between the Valley Plan and the River Plan, also currently circulating. This confusion is avoidable only if the circulation of the Valley Plan awaits the completion of the River Plan process. Regrettably, it is too late for that reasonable delay; however, some of that confusion could be relieved if the public comment period for the Valley Plan were extended until at least 120 days past the completion and publication of a Record of Decision on the River Plan. This is a request to make that extension.

The public should know and be informed that the River Plan guides decisions in the Valley Plan to a significant degree. However, in reviewing the Valley Plan, the only substantive comment concerning actions resulting from the River Plan is simply noted as "**Remove development from the River Protection Overlay.**" I could not find in any of the documents a comprehensive listing of what exactly that removal entails, and request that such a summary document be developed and forwarded as soon as possible.

1/2951

Superintendent David Mihalic
June 23, 2000
Page 2

Several items jump out at me as I read the latest version of the Valley Plan and changes in the underlying assumptions made by park planners. First, there is no "day use reservation system", a proposal which presented a significant hurdle when park planning efforts were first consolidated several years ago. As you know, my constituents almost universally thought that a reservation system would have significant deleterious effects on the park and its neighboring communities, and we opposed all attempts to implement a day use reservation system. This plan indicates that the Park Service has also abandoned the notion of such a system.

Secondly, the notion of visitor "carrying capacity" in the park is mentioned, which regulates people instead of vehicles. As you know, I believe that the Park Service must accommodate those who wish to use the park, and artificial people-based capacity barriers must be avoided at all costs. The use of the 18,241 maximum daily visitation in the valley as outlined in the General Management Plan, is totally out of date. Secretary Babbitt as well as others have often stated their opposition to limiting the number of people coming to the park based on some relatively arbitrary number. You and your staff have assured me that you do not intend to limit visitors, just vehicles.

The change in these assumptions in the plan show that the Park Service is able and willing to learn from the public's comments and concerns, and will help in making the case that the Park Service can accommodate superior ideas as they are developed.

GATEWAY COMMUNITY INPUT

As indicated I have reviewed the data developed in support of the Valley Plan to date, and have substantive comments regarding numerous elements of the preferred alternative. In addition, I am committed to continuing to work with the Park Service to ensure that plans are made available to the public and that the park hears the voice of the gateway communities.

You have detailed your activities presenting the planning document to the public in forums from Washington, DC to Seattle, on the theory that Yosemite National Park is indeed a national asset. I do not disagree that these planning efforts must have as much public input as possible. However, the citizens most directly impacted by park planning efforts are those in the gateway communities that support park activities. For this reason, I anticipate that the park service will listen particularly closely to the comments received from the gateway communities.

Also, your planning efforts include a community that is an integral part of rural Mariposa County - El Portal. As you move forward on El Portal planning, please keep in mind the direct interest of the County in assisting to ensure that El Portal be further integrated into Mariposa County, rather than increasingly isolated from the community at large.

Superintendent David Mihalic
June 23, 2000
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Y-2951

MEDICAL SERVICES

The most immediate issue which arises both in the planning efforts which have been conducted by the park as well as in current contract negotiations with the medical concessionaire is for provision of medical services in Yosemite Valley. The contractor has indicated that they are losing money as a result of the current service agreement; constituents in the Park have indicated that the contractor does not provide community based, but only emergency medical services. The Valley Plan preferred alternative eliminates virtually all medical services from the valley. As indicated in the plan, a large number --almost 20,000 people -- may be in the valley at any given time, with even more if sufficient parking were available. Medical services for emergencies that may arise, as well as community services for those employed in the park are essential for any operation of the size of Yosemite. I cannot imagine what understanding of the needs of visitors and residents of the park would cause the Park Service to consider elimination of essential medical services in Yosemite Valley. Provision of medical services should be predicated on medical need, not abstract park-planning goals.

PARKING

The plan works in conjunction with YARTS (if available) to reduce the employee use of limited parking. If access is being reduced for anyone, it should not be the visitor. Park and concession employees should be provided additional incentives to ensure that mass transit, rather than personal vehicles are the preferred mode of transport into the park. You have worked hard over the past year to ensure that employee transportation is made available through the YARTS process. The current YARTS demonstration project has shown an unexpected level of success in encouraging both employees and visitors to ride instead of drive into the park. We anticipate that your commitment to that project will continue.

Any reduction in parking in the park should be entertained only after adequate replacement transportation is installed, funded, operating and successful.

As I understand it, your preferred alternative consists of a one-time expenditure of \$343 million dollars in capital and planning efforts, roughly \$5.45 million in annual operating cost increases, and \$11 million annually for operation of an internal transit system. This level of funding assumes 550 parking spaces in the valley to accommodate all required day use parking during low visitation days, or at mid-winter levels. As I read the plan, we may increase the level of parking in the east end of the valley to somewhat less than 900 spaces and reduce the annual operations of the shuttle system to approximately \$5 million without significantly affecting other elements of the plan. Can your staff provide each level of service (number of parking spaces) on a cost/benefit chart so that we may identify where the point of diminishing returns for the cost of parking as compared to the cost of busing? The analysis should reflect from 550 to at least 1800 day-use parking spaces, as well as the shuttle costs required at each increment of parking facilities.

Y-2951

Superintendent David Mihalic
June 23, 2000
Page 4

Our preference has always been that the lowest cost, least disruptive alternative is accomplished first. With that in mind, what capital investment level for parking provides the most parking and results in the least amount of time during the course of the year when visitors are required to be bussed? Also, please recollect that the traffic problem this plan is attempting to address is really a problem only during several days each year when traffic is truly gridlocked. During most of the year, there is no significant vehicle or crowding problem in Yosemite Valley.

LODGING FACILITIES

There is a continuing and significant concern with the reduction in overnight accommodations in the Valley. Prior to the flood in 1997, 1,510 lodging units, 833 camping spaces and 1,327 concession employee beds were located in Yosemite Valley. It has been my interest to see these accommodations returned to the valley, enabling the visiting public to stay where the greatest demand is – in the valley itself. The Valley Plan calls for a 38% reduction in overnight lodging from the pre-flood levels, resulting in 981 lodging units and 465 campsites permitted in the plan. In addition, employee housing is not adequately addressed in the alternatives.

The elimination of so many lodging units will have a significant negative effect on the local economy in the long term. As people find out that it is increasingly difficult to obtain lodging in Yosemite Valley, the number of visitors will continue to be reduced. The local economy in the gateway communities is largely dependent on tourism, and Yosemite is certainly the major attraction. As the Park Service implements plans that discourage, rather than encourage visitation, the gateway communities are the most directly impacted.

One possible mitigation is to ensure that there is no net loss of lodging facilities, including campgrounds, in the park as a whole. The development of lodging facilities in the gateways does not offset the perception problem with the public attempting to visit the park. However, development of a park concession, park facility and gateway lodging facility reservation system that is truly system-wide would help to offset the perception of "no room at the Inn." A seamless reservation system for all facilities that would disclose the quality, location and options available for the visiting public would be to everyone's benefit.

One concern that has come to me from various sources is the lack of provision in the plan to accommodate youth groups that utilize Yosemite National Park on a regular basis. The Yosemite Institute as well as other organizations expose urban youth to the wonders of Yosemite in educational programs throughout the year. With low-cost and dormitory facilities eliminated from the valley, there is little remaining appropriate space for these youth. I believe this will limit the park from fulfilling its educational mission, and suggest that the need for these facilities be addressed in this planning effort.

Superintendent David Mihalic
June 23, 2000
Page 5

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The preferred alternative removes an additional 279 lodging units from the Valley, 212 by removing most Housekeeping Camp facilities. Large portions of these are removed because they are in the flood plain. However, no one has lost their life as a result of flood plain activity in Yosemite Valley, and the housekeeping camp facilities seem to be an appropriate use of flood plains. Removal of these facilities will result in a significant loss for all visitors, but I am particularly concerned that there are no alternatives for those in the lower socio-economic strata, and replacement of lodge facilities does not offset that loss. The popularity of the Housekeeping Camp is obvious from the summer usage of these facilities.

Upper and Lower River Campgrounds are currently closed, and the preferred alternative eliminates these campgrounds. Also, North Pines campground is eliminated under your plan. While one of the laudable objectives of this removal is to provide a buffer to the Merced River, I am not convinced that removing campgrounds from the flood plain altogether makes any sense. It seems to me that campgrounds in a flood plain are a reasonable, low impact use of that space. The 465 total campgrounds identified in your planning effort is 368 (44%) less than the 833 pre-flood number.

TRANSPORTATION

The proposed rerouting of the Northside Road from between the Lodge and Yosemite Falls is a significant improvement. Rerouting the road to the south between the river and the lodge will clear the traffic and pedestrian hazards, as well as eliminate the existing bottleneck on the road. This bottleneck is one of the most significant reasons for gridlock in the park at this time.

The preferred alternative calls for the elimination of three bridges and significant changes to traffic flow throughout the Valley floor. While some of those changes are beneficial, others cause some concern. As an example, the elimination of the Northside Drive as an open egress violates the County Fire Safe Standards Ordinance that requires at least two egresses from every developed area in case of fire. I understand that the actual limitation of traffic on the road will not occur until the traffic flow pattern has been established and has proven to be successful.

I have seen the potential washout at Stoneman Bridge and share your concern that the abutments for that bridge will wash out in the relatively near term. However, historic bridges should at a minimum be preserved until all traffic flow issues have been completely reviewed in practice to see how they work. Irreversible decisions such as taking out a bridge should not be implemented until traffic flow has been experienced in all types of circumstances, and further public comment on that revised traffic flow has been obtained.

The historic Superintendent's House has been vacant since the flood. However, as it is a valuable structure in the history of Yosemite, there has been some discussion of restoring it either on-site or in a less fragile area. Additional public input on this aspect of the plan is important.

Superintendent David Mihalic
June 23, 2000
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VISITOR SERVICES

Consolidation of visitor services in the form of a bus staging area, new and improved visitor orientation and increased visitor services is good for park visitors, and addresses the reality that the park has to meet the demands for services emanating from park visitors.

In the Park Service's vision for Yosemite, new NPS visitor centers will be constructed at the various entrance stations or in gateway communities. The nature of these visitor centers and how they will work without interrupting the flow of traffic is important to local day-use visitors, who typically will not need to access these satellite visitor centers. However, gateway communities would benefit from visitor center facilities located in those communities, rather than at the entrance station where other visitor services are not available. I would support development of visitor facilities in gateway communities that have the capability to accommodate visitor needs.

The proposed ten lane traffic check station at the entrance to the valley has been dubbed "Checkpoint Charlie" and compounds the perception that the intention of this plan is to control visitors, rather than enhance the visitor experience. While the purpose of this valley-entrance station is not described in any detail, it implies significant development at the West End of the valley. One of the goals of this plan ought to be to limit west-valley development, and the proposed Checkpoint Charlie violates that goal.

The Checkpoint would also contribute to the identified need to add 127 Park Service employees at an annual cost of \$5.45 million. I cannot support such an increase in the Interior Appropriations bill here in Congress for the purposes outlined in this plan, and firmly believe that increased costs for fewer but more regulated public services are not in the national interest.

Your plan reflects that the overall average travel time to Yosemite Valley as a result of this plan would increase by 21 minutes. I cannot see how that increase will contribute positively to the visitor experience. On the contrary, efforts to reduce the time of travel to the valley should be sought. Recent improvements such as the rebuilding of Highway 140 into the valley are essential elements of improving the visitor experience in this way. The plan also acknowledges that visitor spontaneity would be reduced, and that demands of the public would be less likely to be fulfilled if the plan were adopted. All of these elements of the plan work contrary to the purpose of the Park Service to provide for the needs of the visiting public.

ADMINISTRATIVE OPERATIONS

The removal from the park of purely administrative functions and non-visitor services commits the Park Service to providing enhanced visitor service rather than more administrative services. This recognizes the obligation of the park service to address visitor demands as a higher priority and better than currently.

Superintendent David Mihalic
June 23, 2000
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I support the efforts of the Park Service to move non-essential park and concession operations, including administrative support, accounting, personnel operations etc. out of the valley. The local communities surrounding the park have expressed interest in providing office space, housing and support for these services. Your interest in the development of public-private partnerships for provision of office space, employee housing, visitor services and other services is encouraging, and I commend you for that effort.

Even in alternatives other than the preferred alternative, the use of public-private partnerships to provide parking, employee housing and other unmet visitor needs is commendable. Public-private partnerships with local landowners, housing developers, the Yosemite Institute, Yosemite Association, Hazelgreen and others are all supportable efforts.

The plan reflects a number of moves of staff and services from the valley to gateway communities. These moves are not detailed in their scope and are undefined in their impact on the surrounding communities, including El Portal. Again, we think that these moves would be significant improvements to the current operation of the park. A joint effort with the gateway communities to identify these services which could be moved, as well as the unmet needs of the park and the impacts of moving these services seems appropriate. This planning effort should include the local communities from the very outset, and funding for the planing is clearly within the responsibility of the Park Service.

PUBLIC REVIEW

Because of the law of unintended consequences, the plan that you have developed will have huge, unknown impacts on the lives of everyone who visits or lives near Yosemite. As a result, the longer and more generally you can circulate the plan and take public input, the better. For this reason, I believe that your stated timeline accomplishing this plan prior to the end of the current calendar year is not realistic. The confusing planning process which has occurred over the past 20 years since the general management plan that this purports to implement makes more public airing all the better.

One of the elements that are absolutely necessary for the public to understand the scope and magnitude of the plan is a document that shows the sequence of events and a related time-line. As an example, was the public to be informed that the removal of the vehicle bridge does not occur until the traffic flow has been modified and shown to be successful, there may be less public objection. I make this request in the interest of full public disclosure of your preferred alternative.

Finally, a document that shows which elements of the plan may be implemented with the adoption of the Valley Plan, and which take further public review and comment would be helpful. You have assured me that many of the elements of the plan which have engendered public controversy will continue to be subject to public review through several more steps in

Superintendent David Mihalic

June 23, 2000

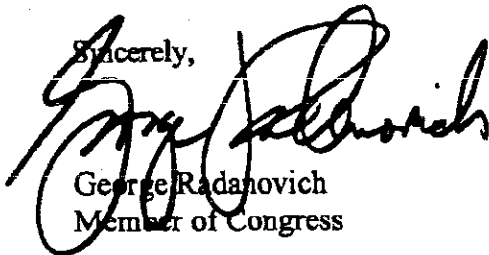
Page 8

Y-2951

the planning process. Which elements of the plan fit into this category verses elements that you intend to implement as a result of the adoption of the valley plan?

Thank you very much for the opportunity to address these many areas of concern. I look forward to hearing back from you at your earliest convenience in response to the questions I have raised. It has been an interesting experience to complete the review process over the past several months, and I look forward to further discussions with you and my constituents on this and any other matters of importance to the 19th District of California.

Sincerely,



George Radanovich
Member of Congress



United States
Department of
Agriculture

Forest
Service

SIERRA
NATIONAL
FOREST

YVP-8900
1600 TOLLHOUSE ROAD
CLOVIS, CA 93611-0532
559 297-0706
FAX 559 294-4809
TTY 559 322-0425

File Code: 1530

Date: JUL 07 2000

David A. Mihalic, Superintendent
Yosemite National Park
P.O. Box 577
Yosemite, CA 95389

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JUL 7 2000

YOSEMITE NATIONAL PARK

Dear Mr. Mihalic:

Please consider these comments to the Draft Yosemite Valley Plan from the Stanislaus and Sierra National Forests as you prepare your final plan. We full appreciate the effort and thought that large planning initiatives such as this require of you and your staff.

The Stanislaus and Sierra National Forests, and to a lesser degree the Inyo National Forest, are uniquely impacted by changes in visitor experience and employee housing facilities in Yosemite National Park. Any major expansion or reduction in developed recreation sites, location of employee housing or modification of visitor access, causes a ripple effect beyond the park boundary and onto the adjacent National Forest System lands. If the preferred Alternative (Alternative 2) is selected for the Final Yosemite Valley Plan, there are two major consequences on National Forest Service lands that have not been adequately mitigated.

Alternative 2 identifies a reduction in almost 300 overnight visitor accommodations within the valley, with no development of additional facilities within the Park. This reduction in Park accommodations will result in a tremendous increase in visitor use of developed and dispersed recreational sites on adjacent national forests along the major corridors leading to the Park, generating increased impacts when compared to the current condition. These impacts will include increased resource damage and need for greater management oversight of affected recreational areas on National Forest System lands. This will increase our management costs and may require the Forest Service to close portions of the Forests to dispersed camping opportunities.

Representatives of the adjacent National Forests are interested in participating in the five-year visitor experience, resource protection and facility capacity study identified on page 2-12 of the Executive Summary prior to the implementation of this portion of the Yosemite Valley Plan.

The relocation of approximately 700 employee beds to El Portal will roughly double the population of this small community which lacks sufficient infrastructure to meet the needs of its existing population. The pressure on the Recreation Outstanding Remarkable Value within the Merced River Wild and Scenic Corridor on both El Portal Administrative Unit and National Forest System lands will be major, long term, and adverse, as opposed to minor, long term, and beneficial as identified on page 4-50 of the Executive Summary. Failure to adequately mitigate

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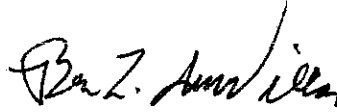
the natural resource and social aspects of this dramatic increase in population will significantly reduce the quality of the recreational experience for the visiting public and employees and reassignments located at El Portal and may result in the need to vastly increase the cost of management of this area and or result in the reduction of dispersed recreational opportunities within the Merced River Wild and Scenic River Corridor on National Forest System lands.

Sincerely,



for

ALAN QUAN
Acting Forest Supervisor
Sierra National Forest



BEN L. DEL VILLAR
Forest Supervisor
Stanislaus National Forest



United States
Department of
Agriculture

Forest
Service

Stanislaus National Forest

19777 Greenley Road
Sonora, CA 95370-5909
(209) 532-3671
FAX: (209) 533-1890
TTY/TDD: (209) 533-0765
<http://www.r5.fs.fed.us/stanislaus>

9221

File Code: *2300

Date: *July 7, 2000

David A. Mihalic
Superintendent
Yosemite National Park

*Dear Superintendent Mihalic:

Our comments relate to the following portions of the draft VIP SEIS.

Page 1-7 to 1-9 **Goals and Visitor Experience-**

"Reclaim natural beauty, Allow Natural Processes to prevail, Promote visitor understanding and enjoyment, Markedly reduce traffic congestion, and Reduce crowding."

Page 1-10 **"Project Details and Future Studies**

Traveler information and traffic management system
Out of valley parking
Visitor centers near park entrances"

Page 2-8 **"Visitor Use in Yosemite Valley**

"This plan does not present specific limits on visitation. Daily visitation is dependant on vehicle occupancy rates and turnover rates of day use parking spaces and bus bays. While the *General Management Plan* prescribed maximum daily use levels for Yosemite Valley, its analysis was facility- and vehicle-based. No criteria have been developed to protect resources and visitor experience values. The draft YVP SEIS proposes to complete a visitor experience and resource protection study within five years of a Record of decision."

Page 2-12 **"Establish or Prescribe**

A five-year visitor experience, resource protection, and facility capacity study to determine the optimum number of visitors that Yosemite Valley resources and facilities could accommodate while preserving park values."

This response centers on the issues relating to day use visitor experience. Since Yosemite is surrounded entirely by four National Forests (Stanislaus, Toiyabe, Inyo, and Sierra), cooperation between the two agencies can provide a more positive and seamless experience for our common visitors. Some of the proposed actions will have an indirect impact on adjacent National Forests.

The proposed 66% reduction in day use parking will reduce opportunity for private vehicle day trips from National Forest campgrounds and adjacent private lodging facilities. The uncertainty of valley parking/touring management approaches and future bus service routes/schedules makes it difficult to predict the impact. There will be some loss of spontaneity and freedom when day use parking is not available within the valley. Mandatory bus use will not be viewed favorably by many users, or will significantly change the recreation experience.

The proposed visitor experience and resource protection study should include the entire Park, portions of adjacent National Forests, and gateway communities. Following are a few points that are worthy of consideration within the regional context.



9221

- Auto touring is currently the #1 recreation activity on National Forests. If use of private vehicles is reduced within the Park, adjacent National Forests are likely to see an increase. Tour routes can be identified and managed.
- The 66% reduction in day use parking within the valley will likely result in assigned parking and a waiting period to enter. If waiting occurs at the entrance stations, nearby National Forest sites will be heavily impacted.
- Recreation opportunities and attractions can be identified and marketed to provide a meaningful recreation experience near bus stops and entrance stations while visitors are waiting.
- Private land within the National Forest, such as Hazel Green, may develop parking capacity and bus service even though not included in the preferred alternative. There are potential impacts to adjacent National Forest Land.
- Infrastructure and transportation planning should be responsive to the desired recreation experience. Outlying lodging and camping facilities serve as the base camp for the Yosemite Valley experience. The trip to and from the valley is part of the overall experience for these users.
- Interagency cooperation can maximize benefits. The Evergreen Road between the the Big Oak Flat entrance station and Hetch Hetchy has great potential to develop recreation opportunities and interpretative programs. The Highway 120 corridor has similar potential.

Yosemite Valley is recognized as California's premier natural attraction. A visit to Yosemite Valley is often the highlight of a family vacation, which may involve many other destinations. Many visitors revere this landscape as sacred and the visit to it has very spiritual qualities. To our common customers, the recreational landscape has invisible boundaries between our agencies. During this time of change, it is important for us to work together to maximize benefits and opportunities.

Sincerely,

BEN L. DEL VILLAR
Forest Supervisor

*



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, CA 94105-3901

YVPD 10174

July 12, 2000

David Mihalic, Park Superintendent
Attn: Yosemite Valley Plan/SEIS
Post Office Box 577
Yosemite National Park CA 95389

Dear Mr. Mihalic:

The U.S. Environmental Protection Agency (EPA) has reviewed the Supplemental Environmental Impact Statement (SEIS) for the Draft Yosemite Valley Plan (CEQ #000105). Our review is pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (~~40 CFR Parts 1500-1508~~) and Section 309 of the Clean Air Act (CAA).

The purpose of this project is to develop a comprehensive plan for the management of Yosemite Valley. This document is based on the broad goals of the 1980 *General Management Plan* and focuses on four general areas: 1) resource preservation and restoration, 2) visitor enjoyment, 3) transportation, and 4) employee housing. EPA commends the National Park Service for its efforts in the development of this document. The document is both inclusive, in terms of the public input process that was undertaken, and comprehensive, in terms of its approach and analysis of management issues. EPA is particularly supportive of the National Park Service's efforts to reduce traffic congestion through the management of private vehicles and the provision of transportation options. These are positive steps towards the eventual goal of removing private vehicles from Yosemite Valley. In addition, EPA applauds the implementation of the River Protection Overlay in each of the alternatives, as well as the identification of geologic hazard zones to help identify appropriate areas for development within Yosemite Valley.

The SEIS lays out four alternatives and Alternative 1, a "No Action" alternative. Alternative 2 is identified as the *preferred alternative*. There are many nuances that differentiate each of the alternatives from the others. However, some general similarities exist. For example, each alternative includes:

- the conversion of, at least a portion, of Northside Drive into a multi-use paved trail
- the removal of some historic bridges
- a reduction in the total number of lodging units
- the restoration of California black oak communities
- the expansion of shuttle bus routes

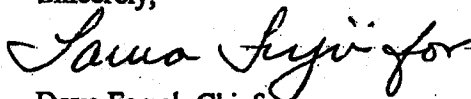
One of the more distinguishing features between the alternatives is the location and quantity of day-visitor parking.

ALTERNATIVES	In-Valley Day Parking	Out-of-Valley Day Parking
Alternative 2 (Preferred) Yosemite Village Parking & Out-of-Valley Parking	Parking consolidated at Yosemite Village (550 spaces)	Parking at Badger Pass, South Landing, and El Portal (about 1,570 total spaces)
Alternative 3 Taft Toe Parking	Parking consolidated at Taft Toe (1,622 spaces)	No out-of-Valley parking
Alternative 4 Taft Toe and Out-of-Valley Parking	Parking consolidated at Taft Toe (550 spaces)	Parking at Badger Pass, Hazel Green, and El Portal (up to 1,600 spaces)
Alternative 5 Yosemite Village, Curry Village and Out-of-Valley Parking	Parking consolidated at Yosemite Village and Curry Village (636 total spaces)	Parking at Henness Ridge, Foresta, and El Portal (up to 1,080 spaces)

Expanded shuttle bus service plays a large role in each of the alternatives, especially in Alternatives 2, 4, and 5 where shuttle service ~~is necessary to move~~ visitors between out-of-Valley parking areas and Yosemite Valley. While we believe the National Park Service has done an excellent job in the development of the SEIS, we are concerned that the issue of shuttle bus fuel type, the role of the National Park Service in the selection of fuels, and the criteria that will be used in the selection process remains unclear. These issues are of importance to EPA because we would like to ensure that every opportunity is taken to protect air quality in Yosemite Valley, including the use of cleaner fuels. Based on these concerns, EPA has rated the preferred alternative, Alternative 2, an EC-2, *Environmental Concerns-Insufficient Information*. Please see the enclosed rating sheet for further explanation of this rating, as well as our Detailed Comments, which discuss these issues and provide additional recommendations.

We appreciate the opportunity to review this SEIS. When the Final EIS is completed, please send two copies to me at the address above. If you have any questions concerning our comments or recommendations, please have your staff contact Nova Blazej, our principal reviewer on this project. Nova can be reached at 415-744-2089 or blazej.nova@epa.gov.

Sincerely,



Dave Farrel, Chief
Federal Activities Office

Attachments: Summary of EPA Rating Definitions
2000 Buy-Recycled Series: Construction Products and Landscaping Products
EPA: *Construction Waste Management* brochure
Fleet Maintenance Pollution Prevention

US EPA COMMENTS
SUPPLEMENTAL EIS: DRAFT YOSEMITE VALLEY PLAN

AIR QUALITY

Clean Fuels

As with many other National Parks, air quality is a primary environmental concern in Yosemite National Park. The Park is classified as a mandatory Class I area under the Clean Air Act, which is designed to protect visibility in national parks and wilderness areas. In addition to visibility, ozone, a criteria pollutant, is of concern in Yosemite Valley. Mobile source emissions are major contributors to the formation of ozone, and in Yosemite Valley, emissions associated with vehicles and tour buses constitute the largest sources of mobile source emissions (pp. 3-46 - 50). Because of the importance of protecting air quality in Yosemite National Park, Park efforts should take advantage of every opportunity to reduce air pollutants, including the use of cleaner fuels in Park shuttle buses.

The shuttle bus fleet used for both in-Valley and out-of-Valley service will fall under the jurisdiction of the National Park Service. The SEIS includes a discussion of the use of alternative fuels in the park shuttle bus system and presents a range of fuel options and the emissions for those fuels (p. 4.2-43, 4.3-21, 4.4-23, 4.5-22). The fuel options include diesel, compressed natural gas (CNG), propane, and fuel cells. However, the SEIS does not specify which fuel(s) will be used or how the determination will be made to select fuels.

- ▶ ***Recommendation:*** Clarify that both the in-Valley and out-of-Valley shuttle bus fleets fall under the jurisdiction of the National Park Service, and that the National Park service will determine the fuel type(s) that will be used in the shuttle bus fleets.
 - ▶ ***Recommendation:*** Better define the criteria that will be used for purchasing/contracting for the shuttle bus fleets.
 - ▶ ***Recommendation:*** Underscore the National Park Service's commitment to selecting the best available technology for the in-Valley and out-of-Valley shuttle bus fleets, e.g. as outlined on p. III-14, *Public Comments and Responses*, Air Quality. The discussion of vehicle generated emissions for Alternative 2 (p.4.2-42) seems to imply that diesel shuttle buses will be selected to transport visitors from the out-of-Valley parking areas.
-
- ▶ ***Recommendation:*** Clarify what type of diesel shuttle buses are under consideration, conventional diesel or clean diesel.

Transit

The implementation of the Yosemite Regional Transportation System (YARTS) has the potential to significantly impact traffic flows, parking demand, and air quality in and around Yosemite National Park. Mention is made of YARTS in Chapter 4: *Environmental Consequences* and other sections of the document. However, a focused description of YARTS, its relationship to Yosemite National Park, and the pilot project is not provided.

- ▶ **Recommendation:** Include a detailed description of the Yosemite Regional Transportation System (YARTS), its relationship to Yosemite National Park, and the pilot project under "Transportation" in Chapter 3: *Affected Environment* of the SEIS.
- ▶ **Recommendation:** Provide a more detailed discussion of the cumulative impacts of YARTS on transportation and air quality of the five Alternatives.

POLLUTION PREVENTION/MATERIALS REUSEStormwater Runoff

Alternatives 2, 4, and 5 all include out-of-Valley parking. The SEIS identifies the number of parking spaces needed at each of the sites, but does not provide information on the size of the out-of-Valley parking sites or any specific site design features under consideration for these sites. EPA is concerned that the creation of conventional, impermeable "black-top" parking surfaces can lead to the concentration of polluted stormwater runoff.

- ▶ **Recommendation:** In the Final EIS, commit to the development of site designs for the out-of-Valley parking sites that will protect stormwater quality.

Materials Reuse & Buy Recycled

Alternatives 2, 3, 4, and 5 all include the removal of historic bridges and structures. The SEIS does not discuss opportunities for materials reuse.

- ▶ **Recommendation:** In the Final EIS, commit to materials reuse, where appropriate and feasible, in the removal of bridges and other structures in the Park. In addition, the Resource Conservation & Recovery Act (RCRA) Section 6002 requires federal, state, local agencies, and their contractors, that use appropriated federal funds to purchase EPA-designated recycled materials, including EPA-designated construction and landscaping products. For further details see EPA's web site at <http://www.epa.gov/cpg>. Include a commitment to these requirements in the Final EIS. See attached materials.

Fleet Maintenance

Alternative 2, the preferred alternative, estimates the need for 74 shuttle buses to provide both in-Valley and out-of-Valley shuttle bus service. The SEIS does not provide detail on fleet maintenance.

- ***Recommendation:*** In the Final EIS commit to pollution prevention practices for fleet maintenance. See attached information sheet on pollution prevention practices for fleet maintenance.

SEIS: Yosemite Valley Plan Summary Paragraph (R9 #003197, HQ ##000105)

EPA expressed concerns regarding the vehicle emission impacts from the proposed in-Valley and out-of-Valley shuttle bus systems. EPA requested more information on the standards and criteria that will be used to select the fuel(s)/technology used in the shuttle bus fleets.



1300 I STREET, SUITE 125
P.O. BOX 944255
SACRAMENTO, CA 94244-2550

Public: 916-445-9555
Telephone: 916-322-1802
Facsimile: 916-327-2319

July 7, 2000

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JUL 7 2000

YOSEMITE NATIONAL PARK

David A. Mihalic, Superintendent
Yosemite National Park
United States Department of the Interior
National Park Service
P.O. Box 577
Yosemite National Park, California 95389

RE: Draft Yosemite Valley Plan and Supplemental Environmental Impact Statement

Dear Mr. Mihalic:

This letter contains the comments of the Attorney General of the State of California regarding the National Park Service's Draft Yosemite Valley Plan and Supplemental Environmental Impact Statement (the "Yosemite Valley Plan" or "Plan").

The Attorney General submits these comments pursuant to his independent authority to protect the public interest under the California Constitution, common law, and statutes. Along with other California agencies, the Attorney General has the power to protect the natural resources of the State from pollution, impairment, or destruction. (See Cal. Const., art. V, § 13; Cal. Gov. Code, §§ 12511, 12600-12; *D'Amico v. Board of Medical Examiners* (1974) 11 Cal.3d., 14-15.) These comments are made on behalf of the Attorney General and not on behalf of any other California agency or office.

This letter focuses on some major concepts and concerns and is not an exhaustive discussion of all issues raised by the Yosemite Valley Plan.

Comments

As is reflected in the eloquent passage from the National Park Service ("NPS") 1980 General Management Plan ("GNP") for Yosemite National Park, there is no single environmental resource that has greater emotional importance to Californians than the Yosemite Valley:

Yosemite Valley is but a mile wide and seven miles long, yet this tiny place on

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the face of our planet is a premier masterwork of the natural world. It is of incalculable value to those who seek it and is cherished in the consciousness of those who know it only through works of art and the written word. Yosemite Valley and the sweep of Sierra wilderness that surrounds it possess superlative scenic grandeur and are a constant test of our wisdom and foresight to preserve them as a treasure for all people.

Introduction to Yosemite National Park General Management Plan (1980).

We appreciate the enormous amount of effort and time that the NPS has devoted to planning for the future of Yosemite Valley; this effort is reflected not only in the Yosemite Valley Plan but also in the Merced Wild and Scenic River Plan ("Merced River Plan") released earlier this year. As we stated in our comments on the Merced River Plan,¹ we agree that the special character of Yosemite warrants holding these planning efforts to the highest possible standards.

As a general matter, we are pleased that the NPS has undertaken to focus on and to further the goals articulated in the 1980 GMP in developing the Yosemite Valley Plan. In particular, the goals of the GMP to reclaim priceless natural beauty, to allow natural process to prevail and to markedly reduce traffic congestion, will not only serve to preserve the splendor of the Yosemite Valley for future generations but will also improve the quality of the visitor experience for those using the Park today. As the 1980 GMP states, "[i]ncreasing automobile traffic is the single greatest threat to the enjoyment of the natural and scenic qualities of Yosemite... The Valley must be freed from the noise, the smell, the glare, and the environmental degradation caused by thousands of vehicles." Introduction to GMP. The GMP expresses the intent of the NPS to "remove all automobiles from Yosemite Valley . . . and to redirect development to the periphery of the park and beyond." *Id.* The GMP recognizes that these policies clearly will alter the visitor experience in the Valley, but concludes that overall the alteration will be positive: "The result will be that visitors can step into Yosemite and find nature uncluttered by piecemeal stumbling blocks of commercialism, machines, and fragments of suburbia." *Id.*

These goals and policies were developed over two decades ago after years of work by the NPS. As the Yosemite Valley Plan acknowledges, however, there has only been a small amount of progress since 1980, "often with only minor contributions to improving natural processes and visitor experience." YVP at 1-6. At the same time, increasing understanding of and appreciation

¹Letter dated March 9, 2000 to David A. Mihalic.

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for the natural processes at work in the Valley – particularly with respect to the importance of maintaining the natural dynamic of the Merced River ecosystem – coupled with the increasing popularity of the Park, have only intensified the necessity of reaching the goals outlined in the GMP. YVP at 1-5, 1-6. These developments have likewise increased the management challenges faced by the NPS.

That the Yosemite Valley Plan reaffirms the importance of the goals and directives articulated in the GMP and outlines specific steps to meet them is a positive development, welcomed by this Office.² It is, however, critical that the Plan not merely reiterate the goals of the GMP but that it move beyond the GMP to provide a workable framework for implementation, so that significant progress will result. Toward that end, we believe that some improvements in the Plan are necessary to ensure that it does not become just another plan taking up space on the shelf. Similarly, the value of the EIS as an informational document can be significantly increased by changes in some key areas.

1. *The Yosemite Valley Plan should more clearly specify when additional environmental review will be required for implementation of specific projects.*

NEPA requires all federal agencies to prepare an Environmental Impact Statement (EIS) for "major federal action significantly affecting the quality of the human environment" (42 U.S.C. § 4332(2)(C)), in order to "assure that federal agencies are fully aware of the impact of their decisions on the environment." *Friends of the Earth v. Hintz*, 800 F.2d 822, 836 (9th Cir. 1986). Under NEPA, an EIS must contain a "detailed statement" of environmental impacts (42 U.S.C. § 4332(2)(C)) and must also identify appropriate mitigation measures, including measures to avoid, minimize, or rectify an environmental impact. (42 C.F.R. §§ 1502.14(f), 1508.20).

NEPA authorizes "tiering," to allow an agency to prepare a broader "programmatic" EIS at the planning level, to be followed by subsequent narrower second or even third tier analyses as site-specific projects are proposed. 40 C.F.R. §§ 1508.28, 1502.20. Tiering is not a device to avoid analysis, but only to allow it to be phased, as a project is phased. Any analysis not included in the first-tier, programmatic document must be included in a subsequent, project-specific analysis. See, e.g. *City of Tenakee Springs v. Clough*, 915 F.2d 1308, 1312 (9th Cir.

²In January 1990, this Office commented on the NPS' August 1989 "Draft Evaluation Report" review of the 1980 General Management Plan. Those comments expressed concern that the "evaluation" actually sought to modify the management directives outlined in the 1990 plan without complying with the National Environmental Policy Act. Fortunately, similar issues are not presented by this draft Yosemite Valley Plan.

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1990 ("Where there are large scale plans for regional development, NEPA requires both a programmatic and a site-specific EIS.")) A broad EIS prepared for a planning project, such as the Yosemite Valley Plan, that contains information largely general in nature cannot substitute for specific analysis of impacts and mitigation measures associated with the site-specific projects contemplated in that plan. *Sierra Club v. United States*, 23 F.Supp.2d 1132, 1142 (N.D. Cal. 1998).

The draft Yosemite Valley Plan contemplates that a number of site-specific construction projects will be undertaken in the Valley, including the construction of new lodging units, visitor center facilities, facilities to service transit and shuttle bus operations, and rerouting of roads. Because it addresses land use allocation for the entire Valley, the Plan is necessarily general in its level of analysis of the myriad projects evaluated. Some of these site-specific projects, however, while they may be ultimately beneficial to the environment of the Valley as a whole, may result in substantial localized impacts which need to be evaluated and mitigated. Under NEPA, site-specific implementation of projects called for in the Plan may require more detailed analysis, specific to the particular resources affected.

Other than providing a few examples for which further review "may" be required, however, the draft Plan, however, does not specify when and under what circumstances further site-specific analysis will actually occur. YVP Executive Summary ("ES") at 1-10; *see also* YVP ES at 2-23, YVP Vol. 1A at 1-14. Accordingly, it is difficult to determine whether the Plan will ultimately result in adequate analysis to enable the public and decision-makers to understand and fully evaluate the environmental consequences of the proposed actions. The Plan could be greatly improved by clearly identifying the actions for which the NPS will conduct additional specific analysis, and distinguishing them from the actions for which the NPS believes the more general level of analysis included in the Yosemite Valley Plan is adequate.

2. *The Yosemite Valley Plan should clarify the scope of the proposed action in order to identify whether the range of alternatives considered is sufficient.*

As note, the extent to which the NPS will conduct additional site-specific environmental review is not clear. Similarly, the nature and scope of the decision that the NPS will take on the basis of this Plan is also unclear. Accordingly, it is difficult for the public to determine whether the draft Plan considers a broad enough range of alternatives to sharply define the issues as required under NEPA.

Under NEPA, a federal agency must "study, develop, and describe appropriate alternatives" to a proposed action. 42 U.S.C. § 4332(E). Further, the agency must "[r]igorously explore and objectively evaluate all reasonable alternatives and discuss the reasons for

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eliminating alternatives from consideration. 40 C.F.R. § 1502.14(a) (emphasis added). Consideration of alternatives to a proposed agency decision is the "heart" of the EIS under NEPA, because it is the comparative analysis of the alternatives that "sharply defin[es] the issues and provid[es] a clear basis for choice among the options." 40 C.F.R. § 1502.14. "[A]n agency must look at every reasonable alternative, with the range dictated by the nature and scope of the proposed action, and sufficient to permit a reasoned choice." *Idaho Conservation League v. Mumma*, 956 F.2d 1508, 1520 (9th Cir. 1192, citations omitted). Thus, whether an agency has considered a broad enough range of alternatives to a proposed project in an EIS is dependent on the scope of the decision that the agency will make based on that EIS.

The draft Yosemite Valley Plan proposes a limited range of alternative for some projects. Specifically, with respect to the proposal to rebuild the Yosemite Lodge, three of the four action alternatives propose the same thing -- rebuilding 141 units destroyed by the 1997 flooding. One alternative calls for more rebuilding (195 units). Only the no action alternative proposes not to rebuild any units. In addition, the Plan never considers alternatives such as removing existing units or using the area proposed for rebuilding the Lodge for lower-cost accommodation or for providing an alternate location for employee housing. Similarly, all the action alternatives -- without explanation for the reasons behind this proposal -- call for removing the same number (208) of lower-cost units from Curry Village. Only the no action alternative evaluates retaining these lower-cost units, and no alternatives look at relocating the units to other areas proposed to be developed or redeveloped for housing/lodging type uses.

On the one hand, the Plan suggests that the narrow range was proposed to achieve consistency between this Plan and the levels of service provided in other parkwide planning documents, including the 1980 GMP and the Concessions Services Plan adopted in 1992. YVP Vol. IA at 2-4. The implication of this suggestion is that the NPS perhaps intends to decide based solely on this Plan that (for example) 141 Lodge units will be rebuilt.

On the other hand, however, the Plan specifically recognizes that changing circumstances and further study may result in a modification of the levels of service provided in prior planning documents.³ For example, the Plan expressly acknowledges that the visitor use levels developed in 1980 may be modified after the NPS completes a detailed visitor experience and resource

³ Indeed, as Judge Breyer held in *Sierra Club v. United States*, *supra*, 23 F.Supp.2d at 1144-45, the NPS is not necessarily constrained in its consideration of alternatives by previous park-wide planning documents that call for a certain number of visitors or units of lodging, because the 1997 flooding in the Valley gave rise to new circumstances not contemplated in those other planning documents.

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protection study in the next five years. YVP Vol. IA at 2-11. In addition, the Plan states that the 1997 floods require a decrease in the amount of overnight accommodation from the level anticipated in the 1980 GMP, particularly those accommodation historically located in flood plain areas. Cf. 1980 GMP at 15 with YVP Vol. IA at 2-10. Thus, in acknowledging the potential for change after future study, the NPS suggests that the scope of the decision that will be based on the Plan will be more general in nature; that is, that the Plan will provide maximum levels of service,⁴ or general land use allocations, that will be further analyzed and refined as specific development projects are evaluated. As this additional analysis is conducted, a broader range of alternatives -- such as not rebuilding the Lodge, rebuilding in the form of lower-cost units, rebuilding a smaller number of units, removing some units, using the area for other housing related activities -- would be examined, providing a clearer basis for choice among the options.

Thus, because it is not clear from the draft Plan whether the NPS intends to conduct additional site-specific analysis of a broader range of alternatives as further information becomes available and as "second-tier" environmental review is conducted for specific projects, it is likewise unclear exactly what decision the NPS believes it can make on the basis of this Plan. This lack of clarity makes it difficult, if not impossible, for the public to determine whether the Plan considers a broad enough range of alternatives under NEPA.

3. The Yosemite Valley Plan should include a more comprehensive implementation program.

A detailed, comprehensive implementation program is the key to ensuring that the Yosemite Valley Plan actually accomplish its goals and directives. Although we recognize and understand that the Plan is a programmatic document, it does not include a sufficiently detailed discussion of how and when the various actions adopted to meet the goals will be implemented. While Appendix M describes a "conceptual three phase approach" to implementation of specific projects, it is sorely lacking in detail. YVP Vol. II at II - 73. There is no discussion of the basis upon which the various projects were divided into the three phases, no timelines to explain what actions will be implemented when, and no explanation of how the NPS proposes to obtain the necessary funds for implementation. Most importantly, however, the Plan fails to link the implementation activities to the goals of the Plan, thus there is no guarantee that the limited

⁴Under this scenario, for example, rebuilding 141 units at Yosemite Lodge would be viewed as the maximum development that would be contemplated, subject to revision based on further analysis of impacts and alternatives examined during subsequent, "second-tier" environmental review.

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resources available for implementation will be spent in a manner to ensure that the most important projects are commenced first.

Appendix M should be significantly revised to prioritize implementation activities based on how successful they will be at accomplishing the goals of the Plan to reclaim priceless natural beauty, to allow natural process to prevail and to markedly reduce traffic congestion. A timeline for implementation, and a specific identification of funding amounts and sources, and a program to monitor implementation progress should be included for each activity. In addition, for the reasons stated above, the Plan should also disclose what sort of further "second tier" environmental review under NEPA is contemplated for each activity.

In addition, the Yosemite Valley Plan should contain a specific implementation plan to move toward the use of the cleanest and quietest transit vehicles in the Valley as soon as is technologically feasible. The Plan should clearly establish specific goals and targets to minimize and reduce use of existing diesel technology. Specifically with regard to the air quality impacts of diesel buses, more detail is needed in the Plan to meet the requirement that, at the time it adopts a final EIS, the NPS state whether all practical mitigation measures and a monitoring and enforcement program have been adopted. See 40 C.F.R. § 1505.2. Given the contemplated reduction in automobile traffic and the projected use of shuttle buses, the Plan should also include an analysis of measures to ensure that these shuttles are affordable to the Park visitors who would no longer be able to stay in the Park in low-cost units.

4. The relationship of the Yosemite Valley Plan to the Merced River Plan.

Because the draft Yosemite Valley Plan was released concurrently with the draft Merced River Plan and before adoption of the Record of Decision for the Merced River Plan, how the final versions of both plans will relate to, and be integrated into, each other remains confusing and unclear. Federal law requires that, in the case of conflict between the provisions of the Wild and Scenic Rivers Act and the NPS' Organic Act, "the more restrictive provisions shall apply." 16 U.S.C. § 1281(c). Because the public has not had the benefit of the final Merced River Plan during most of the review and comment period for the draft Yosemite Valley Plan, it is even more imperative that the final Yosemite Valley Plan clearly set forth the connection between the two plans.⁵ In addition, since the intent of the Yosemite Valley Plan is to implement the relevant provisions of the Merced River Plan in the Valley (see YVP ES at 1-12), the Plan should incorporate the monitoring provisions and the implementation standards and guidelines being

⁵This Office takes no position at this time regarding the legal adequacy of the NPS' decision to release the draft Yosemite Plan prior to the final adoption of the Merced River Plan.

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developed for the final Merced River Plan.

5. The National Park Service should adopt actions that best achieve the resource protection and restoration goals for Yosemite Valley.

Although our comments on the Plan are primarily directed to compliance with NEPA and therefore focus on the procedural requirements of the environmental review process, we do support the NPS' approach to focus on and further the goals articulated in the 1980 GMP. Toward that end, the NPS, in adopting its Record of Decision, should adopt the combination of actions outlined in the Plan that accomplish the greatest amount of restoration of natural processes, and that make the most rapid progress feasible toward removing private automobiles from Yosemite Valley.

That said, we recognize that Yosemite National Park and Yosemite Valley are natural wonders of the world which should remain accessible to all. Replacements for automobile access should be both affordable and accessible. Lower-cost overnight accommodations, whether within or very near the park, should be considered and given preference over higher-cost accommodations. Specifically, while we recognize the past problems, the construction of new tent cabins should be carefully considered. They have been proven commercially feasible in other areas,⁶ and might prove environmentally as well as economically superior if appropriately located in the Yosemite area.

Conclusion

We support the goals and focus of the National Park Service's programmatic planning process for the Yosemite Valley. We do, however, urge the NPS to clarify key provisions of the Plan to ensure that it is consistent with the National Environmental Policy Act, and to improve the ability of the Plan to be understood by the public and to be meaningfully implemented.

⁶For example, the Costanoa development in Pescadero, California.

David A. Mihalic, Superintendent
July 7, 2000
Page 9

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Thank you for the opportunity to comment. We look forward to continuing to participate in the Yosemite Valley planning process.

Sincerely,

Sally Magnani Knox

SALLY MAGNANI KNOX
Deputy Attorney General

(by SED)

For BILL LOCKYER
Attorney General

DEPARTMENT OF TRANSPORTATION

P.O. BOX 2048 (1976 E. CHARTER WAY)
STOCKTON, CA 95201
TDD (209) 948-7981
(209) 948-7943



YVPD-6988

July 5, 2000

David A. Mihalic, Superintendent
U. S. Department of Interior
National Park Service
P. O. Box 577
Yosemite National Park, CA 95389

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YOSEMITE NATIONAL PARK

Subject: *California Department of Transportation (Caltrans) Review of the Supplemental Draft Environmental Impact Statement (DEIS) for the Yosemite Valley Plan*

Dear Mr. Mihalic:

Thank you for the opportunity to review this Draft Environmental Impact Statement. Caltrans has reviewed the document through our district and headquarters environmental and intergovernmental review sections. Caltrans is encouraged by your efforts to plan for the continued use and enjoyment of this natural wonder by present and future generations. We have the following comments relative to accessibility, traffic circulation, regional transportation, cultural resources, emergency response, bridge removal, and air quality:

- **Accessibility** – Caltrans would like to see an analysis of Americans with Disabilities Act (ADA) and Environmental Justice accessibility issues. While we understand the Park Service efforts to reduce the number of vehicles and parking spaces in the Park, there should be a discussion as to how the disabled, elderly, and other less mobile visitors may continue to enjoy access to scenic areas. This is especially true on the north side of the Merced River where auto access would be restricted under some of the proposed alternatives.
- **Traffic Circulation Inside and Outside the Park** – Additional information is needed concerning traffic circulation within and outside the Park boundaries. Please discuss the potential impacts of each alternative to State Routes 120, 140 and 41 and what is being proposed to mitigate these impacts. There should be specific discussion regarding levels of service (LOS), peak hour congestion, and queuing problems on state routes leading to the Park. State Route 120 is a designated Interregional Route even though a portion of it traverses Yosemite National Park. This state highway must be accessible and useable by interregional traffic regardless of any National Park Service policy limiting automobile access into Yosemite Valley. Please discuss how the Park Service plans to maintain the route's accessibility to interregional travelers. The Plan should also address the need to accommodate bicycles

Mr. David A. Mihalic
July 5, 2000

traveling between the proposed parking areas and the valley floor. With the Plan's increased emphasis on bicycle use, it is reasonable to expect some people will bicycle to the valley after parking their vehicles.

- **Regional Transportation** – Although the Plan identifies decisions regarding a regional transportation service as being outside its scope, it does address cumulative impacts that may result from implementation of such a system. Additional discussion regarding the impacts of a regional transit system on circulation inside and outside the Park would be helpful in determining the benefits of providing such service to the Park, the region, and to local communities. It would also be appropriate to re-visit the projected future number of private tour buses that will visit the Valley. With a reduction in valley lodging, a reduction of private vehicles in the Park, and the Park Service promoting bus use, it would appear the predicted number of private buses entering Yosemite Valley should increase.
- **Cultural Resources** – Please explain “minor adverse effect” as used in Volume Ib, 4.2-62 through 4.2-74 and tables 4-40 through 4-42. An explanation of the term is appropriate since Section 106 of the National Historic Act uses the terms “no adverse effect” and “adverse effect” and does not include “minor adverse effect”.
- **Emergency Response and Evacuation** – The existing Park bridges and road system provide for adequate emergency and evacuation response in case of fire, flood, avalanche, earthquake, or other natural or human-caused accident or disaster. Please discuss how each build-alternative will affect emergency response and evacuation, and if necessary, what mitigation would be provided to reduce these impacts to a level of insignificance. An area of primary concern is the proposal to convert Southside drive to a two-way facility. This section of roadway receives much less sunlight in the winter than Northside Drive which can affect snow and ice clearing operations. Please identify what measures the Park Service is proposing to make sure the road is clear and passable if an emergency should arise. Also, discuss how emergencies will be addressed under each of the build alternatives.
- **Bridge Removal** – The removal of Park bridges will change the accessibility, circulation, and emergency response pattern of the valley roadway network. Please discuss the impacts of the bridges being removed and mitigation being proposed to address those impacts.
- **Air Quality** – An element of the Plan for improving air quality in Yosemite Valley is the expansion of day-use parking facilities outside the valley, with shuttle buses connecting them to the valley floor. This would reduce the number of private vehicles entering the valley area but increase the number and travel distance of buses serving them. Air quality is also an issue outside the Park boundaries for the regional air basin that includes Mariposa County, Tuolumne County and Yosemite National Park. This air basin will likely be classified in the near future as

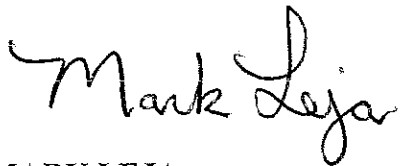
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Mr. David A. Mihalic
July 5, 2000

a non-attainment area for 8-hour ozone (O3). Please include a discussion of the regional air quality issues and the mitigation that would be involved with all the Plan's alternatives.

If you have any questions regarding these comments, please call Jerry Erwin at (209) 948-1922.

Sincerely,

A handwritten signature in black ink that reads "Mark Leja". The signature is written in a cursive, flowing style.

MARK LEJA
District 10 Director



Gray Davis
GOVERNOR

STATE OF CALIFORNIA

Governor's Office of Planning and Research
State Clearinghouse

YVPD 6584



Steve Nissen
ACTING DIRECTOR

July 6, 2000

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JUL 7 2000

YOSEMITE NATIONAL PARK

David A. Mihalic
National Park Service
P.O. Box 577
Yosemite National Park, CA 95389

Subject: Yosemite Valley Plan
SCH#: 2000044003

Dear David A. Mihalic:

The State Clearinghouse submitted the above named Draft EIS to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on July 5, 2000, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Terry Roberts

Terry Roberts
Senior Planner, State Clearinghouse

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JUL 09 2000

Enclosures
cc: Resources Agency

**Document Details Report
State Clearinghouse Data Base**

SCH# 2000044003
Project Title Yosemite Valley Plan
Lead Agency National Park Service

Type EIS Draft EIS
Description Present & analyze alternatives that take a comprehensive look at Yosemite Valley.

Lead Agency Contact

Name David A. Mihalic
Agency National Park Service
Phone (209) 372-0261 **Fax**
email
Address P.O. Box 577
City Yosemite National Park **State** CA **Zip** 95389

Project Location

County Tuolumne, Mariposa, Madera
City
Region

Cross Streets Happy Isles/El Portal Road & Big Oak Road

Parcel No.

Township	Range	Section	Base
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Proximity to:

Highways 41 & 120, 140
Airports
Railways
Waterways Merced River
Schools
Land Use National Park

Project Issues Aesthetic/Visual; Air Quality; Archaeologic-Historic; Flood Plain/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Minerals; Public Services; Soil Erosion/Compaction/Grading; Traffic/Circulation; Water Quality; Water Supply; Wetland/Riparian; Wildlife; Landuse; Cumulative Effects; Population/Housing Balance; Recreation/Parks; Drainage/Absorption

Reviewing Agencies Resources Agency; Department of Conservation; Department of Fish and Game, Region 4; Office of Historic Preservation; Department of Parks and Recreation; Reclamation Board; Department of Water Resources; California Highway Patrol; Caltrans, District 10; Air Resources Board, Transportation Projects; Regional Water Quality Control Bd., Region 5 (Sacramento); State Lands Commission; Department of Forestry and Fire Protection; Native American Heritage Commission

Date Received 04/11/2000 **Start of Review** 04/11/2000 **End of Review** 07/05/2000

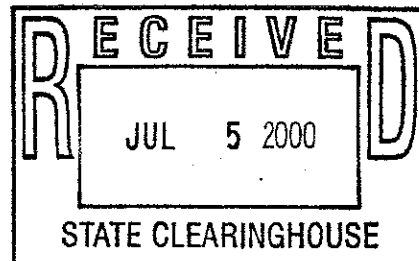
State of California

The Resources Agency

MEMORANDUM

Clear
7/5/00
eTo: Project Coordinator
Resources Agency

Date: July 5, 2000

Mr. David A. Mihalic
National Park Service
P.O. Box 577
Yosemite National Park, CA 95389From: Department of Conservation
Office of Governmental and Environmental RelationsSubject: Yosemite Valley Plan Draft Environmental Impact Statement (DEIS)
SCH #2000044003

The California Department of Conservation's Division of Mines and Geology (Division) has reviewed the Draft Yosemite Valley Plan DEIS. The Division publishes maps and reports on geologic hazards to support informed land use planning and management decisions. We offer the following comments on the DEIS for your consideration.

We commend the Park Service for its work with the U.S. Geological Survey to address the geologic hazards of Yosemite Valley, and in particular for its development of guidelines to reduce the safety risks from geologic hazards to property and future users of Yosemite National Park.

We offer the following suggestions to further improve the DEIS and Yosemite Valley Plan:

- 1) We did not find mention of the hazards from air blast induced by rockfalls. This phenomenon could cause significant property damage and human injury in locations that have stands of tall, shallow-rooted trees. The blow-down of trees at Happy Isles by a rockfall in 1996 is an example of such a hazard. We recommend that the final EIS explore the potential for air blast hazards, using geographic information system (GIS) analysis to map where talus and rock fall shadow zones coincide with stands of forest, particularly shallow-rooted conifers.
- 2) We question the categorization of campgrounds as "Miscellaneous Structures" (Appendix C). Although not occupied to capacity for parts of the year, campgrounds typically are busy at all times of the day and are probably better

Mr. David A. Mihalic
July 5, 2000
Page 2

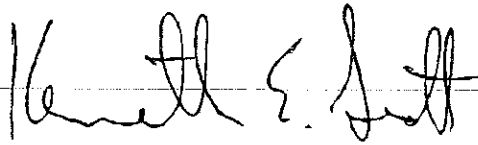
categorized as "Standard Occupancy Facilities." Correspondingly, they should not be placed in the Talus Zone.


- 3) Based on conclusions by Wieczorek, et al. (1998), the final EIS should explicitly state that there is no place in Yosemite Valley that is absolutely safe from, or has zero probability of being affected by, a large rock avalanche.
- 4) The Preferred Alternative (Alternative 2) proposes that two areas of lodging be retained within the Talus Zone. One of these areas is public lodging at Curry Village, below Staircase Falls. The other is employee housing at the Tecoya complex at Yosemite Village. The Curry complex is along or adjacent to a recent debris flow and older rockfalls as mapped by Wieczorek and others (1998). The Tecoya complex is built on a large debris flow derived from Indian Canyon, whose mouth is directly above the housing complex. We recommend that these two areas of housing be converted to non-lodging uses or removed from these areas altogether.
- 5) The U.S. Geological Survey Open-File Report 98-467 by Wieczorek, et al., "*Rock-fall Hazards in the Yosemite Valley*," 1998, should be added to your bibliography. We assume that this reference corresponds to what you cite in Appendix C as "Wieczorek, et al., 1998."
- 6) Add to your Appendix C the diagram of rock-fall shadow as shown in figure 2 of Wieczorek, et al., 1998. It will make clearer to readers what is meant by the concept of "shadow angle."
- 7) On page 4-12 of the Executive Summary, the DEIS states that Out-of-Valley areas were not included in the analysis of geologic hazards because "the relative risk of rockfall in these areas would be negligible due to lack of evidence of past rockfall events." Wieczorek, et al., (1992) present abundant evidence of rockfalls in the Merced Gorge and farther downstream to El Portal, which is outside Yosemite Valley; the rockfalls that have damaged (and closed) State Highway 140 during the past few decades are noteworthy. Because Highway 140 is an "all-year" highway that provides a vital link between El Portal and the Valley for park employees, supplies, and maintenance, the effect of rockfalls on Highway 140 is crucial in planning what should stay in the Valley and what should be moved (or retained) elsewhere. Therefore, we recommend that the DEIS geologic hazard analysis be expanded to include the areas between the Valley and El Portal.
- 8) Add the 1996 Happy Isles rockfall outline to your maps, including the blow-down zone that resulted from the air blast.

Mr. David A. Mihalic
July 5, 2000
Page 3

- 9) Finally, some of the DEIS plates need to be revised to show the correct legend symbols for "Employee Housing" and "Food Service."

Thank you for the opportunity to review and comment on the DEIS for the Yosemite Valley Plan. If you have questions on our comments, or require technical assistance or information with respect to geologic hazards, please contact Mr. Chris Higgins, Geologist with the Division at 801 K Street, MS 8-38, Sacramento, CA 95814; or, phone (916) 322-9997. You may also call me at (916) 445-8733.



 Jason Marshall
Assistant Director

cc: Trinda Bedrossian, Supervising Geologist
Department of Conservation
Division of Mines and Geology

Chris Higgins, Geologist
Department of Conservation
Division of Mines and Geology

STATE OF CALIFORNIA - BUSINESS, TRANSPORTATION AND HOUSING AGENCY

Gray Davis, Governor

DEPARTMENT OF TRANSPORTATION

P.O. BOX 2048 (1876 E. CHARTER WAY)

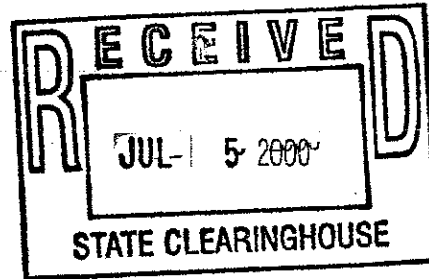
STOCKTON, CA 95201

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July 5, 2000

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David A. Mihalic, Superintendent
U. S. Department of Interior
National Park Service
P. O. Box 577
Yosemite National Park, CA 95389

Sch# 2000044003

Subject: *California Department of Transportation (Caltrans) Review of the Supplemental
Draft Environmental Impact Statement (DEIS) for the Yosemite Valley Plan*

Dear Mr. Mihalic:

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• **Traffic Circulation Inside and Outside the Park** – Additional information is needed concerning traffic circulation within and outside the Park boundaries. Please discuss the potential impacts of each alternative to State Routes 120, 140 and 41 and what is being proposed to mitigate these impacts. There should be specific discussion regarding levels of service (LOS), peak hour congestion, and queuing problems on state routes leading to the Park. State Route 120 is a designated Interregional Route even though a portion of it traverses Yosemite National Park. This state highway must be accessible and useable by interregional traffic regardless of any National Park Service policy limiting automobile access into Yosemite Valley. Please discuss how the Park Service plans to maintain the route's accessibility to interregional travelers. The Plan should also address the need to accommodate bicycles traveling between the proposed parking areas and the valley floor. With the Plan's increased

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Mr. David A. Mihalic
July 5, 2000

emphasis on bicycle use, it is reasonable to expect some people will bicycle to the valley after parking their vehicles.

•**Regional Transportation** – Although the Plan identifies decisions regarding a regional transportation service as being outside its scope, it does address cumulative impacts that may result from implementation of such a system. Additional discussion regarding the impacts of a regional transit system on circulation inside and outside the Park would be helpful in determining the benefits of providing such service to the Park, the region, and to local communities. It would also be appropriate to re-visit the projected future number of private tour buses that will visit the Valley. With a reduction in valley lodging, a reduction of private vehicles in the Park, and the Park Service promoting bus use, it would appear the predicted number of private buses entering Yosemite Valley should increase.

•**Cultural Resources** – Please explain “minor adverse effect” as used in Volume Ib, 4.2-62 through 4.2-74 and tables 4-40 through 4-42. An explanation of the term is appropriate since Section 106 of the National Historic Act uses the terms “no adverse effect” and “adverse effect” and does not include “minor adverse effect”.

•**Emergency Response and Evacuation** – The existing Park bridges and road system provide for adequate emergency and evacuation response in case of fire, flood, avalanche, earthquake, or other natural or human-caused accident or disaster. Please discuss how each build-alternative will affect emergency response and evacuation, and if necessary, what mitigation would be provided to reduce these impacts to a level of insignificance. An area of primary concern is the proposal to convert Southside drive to a two-way facility. This section of roadway receives much less sunlight in the winter than Northside Drive which can affect snow and ice clearing operations. Please identify what measures the Park Service is proposing to make sure the road is clear and passable if an emergency should arise. Also, discuss how emergencies will be addressed under each of the build alternatives.

•**Bridge Removal** – The removal of Park bridges will change the accessibility, circulation, and emergency response pattern of the valley roadway network. Please discuss the impacts of the bridges being removed and mitigation being proposed to address those impacts.

•**Air Quality** – An element of the Plan for improving air quality in Yosemite Valley is the expansion of day-use parking facilities outside the valley, with shuttle buses connecting them to the valley floor. This would reduce the number of private vehicles entering the valley area but increase the number and travel distance of buses serving them. Air quality is also an issue outside the Park boundaries for the regional air basin that includes Mariposa County, Tuolumne County and Yosemite National Park. This air basin will likely be classified in the near future as a non-attainment area for 8-hour ozone (O₃). Please include a discussion of the regional air quality issues and the mitigation that would be involved with all the Plan's alternatives.

Mr. David A. Mihalic
July 5, 2000

If you have any questions regarding these comments, please call Jerry Erwin at (209) 948-1922.

Sincerely,

Original Signed
by
MARK LEJA
District 10 Director

YOSEMITE VALLEY PLAN PUBLIC HEARING;
MERCED, CALIFORNIA; MAY 24, 2000;
SPEAKER NO. 8; COMMENT NO. 20107;

MARK J. HENDRICKSON
777 W. 22nd ST. B
MERCED, CA 95340

Hi, my name is Mark Hendrickson. I'm
here tonight representing state Senator Dick
Monteve. Thank you very much for this opportunity
tonight.

As the Senator represents three gateway
counties, he understands the importance of Yosemite
National Park in relation to these communities and
their economies. As in the case of Mariposa County
where more than 60 percent of their revenue is
actually derived from tourism. So obviously these
communities are very dependent upon the Park.

So on behalf of the Senator, it is my
purpose tonight to express the following: First in
terms of whatever alternative of the Yosemite Valley
Plan is actually chosen, you should take into account
the economic effects that it will have on the
aforementioned communities.

Secondly, this plan should allow for
accessibility for all people, as is the American

1 taxpayer who actually owns the Park.

2 And, lastly, this is relative to my
3 second point, some of the alternatives seem to
4 indicate the restriction of vehicle access in the
5 Valley by moving parking places outside of the
6 Valley. He would like to remind everyone that some
7 people are challenged with special needs and busing
8 may not be possible in all instances.

9 Yosemite is one of our nation's greatest
10 treasures and should remain accessible to all who
11 wish to enjoy it. Thank you very, very much.

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1 COMMENT NUMBER: 20,252
2 KAREN MERRITT
3 UNIVERSITY OF CALIFORNIA, MERCED
4 1111 Franklin Street, 11th Floor
5 Oakland, California 94607

6 MS. MERRITT: Thank you. My name is Karen Merritt,
7 and I'm representing the University of California at
8 Merced. I'm speaking in support of the Hazel Green
9 development and Alternative IV.

10 The University of California's newest campus, UC
11 Merced, has a keen interest in the proposed Destination
12 Villages' development of an ecologically sensitive resort
13 at Hazel Green.

14 As part of its plan, Destination Villages has
15 offered to erect and donate a research field station to
16 UC Merced and endow a professorship. We believe that
17 these gifts would support an expanded program of
18 University-sponsored research and education that would
19 benefit the park directly and would add another dimension
20 to the park's own program of public education.

21 UC Merced is creating the Sierra Nevada Research
22 Institute to discover and disseminate new knowledge that
23 contributes to sustaining natural resources and promoting
24 social well-being in the Central Valley and the Sierra
25 Nevada. Among its planned emphases are air and water
26 quality, biodiversity and habitat fragmentation, invasive
species and fire ecology.

1 As part of the Sierra Nevada Research Institute, UC
2 Merced has entered into a Memorandum of Understanding
3 with Yosemite National Park for partnership in research,
4 education and outreach. A research station at Hazel
5 Green would help carry forward that partnership.

UC Field Research Stations are magnets to bring research talent from throughout the world by providing residential facilities near research sites for faculty and graduate students. In addition, faculty bring their undergraduates for fieldwork. K-12 teachers use field trips to motivate their students to study science and history, and scholars and residents offer public lectures, workshops and conferences. The station will contribute to knowledge that will assist Yosemite's resource managers.

16 Finally, the proposed John Muir Professorship will
17 be an additional way to educate visitors about new
18 knowledge coming out of the field.

19 As you consider the benefits of a day use transit
20 center at Hazel Green to ease congestion in the valley, I
21 hope that you will also support the benefits to the park
22 of Destination Villages' generous offer to conduct a UC
23 Merced field station of the Sierra Nevada Research
24 Institute and fund a John Muir Professorship as part of
25 it. Thank you very much.

26 - o o o -

YVPD-4297
RECEIVED**RESOLUTION ON REJECTION OF THE DRAFT
YOSEMITE VALLEY PLAN**

JUN 29 2000

June, 2000

YOSEMITE NATIONAL PARK

Whereas: The Coarsegold Resource Conservation District [CRCD] is clearly a government entity as established under the Direction of the State of California Public Resources Code, Division 9, and the Directors are appointed and serve at the discretion of the Madera County Board of Supervisors. The CRCD also have a Mutual Agreement between the U.S.D.A., State of California and the CRCD signed by the Secretary of Agriculture, dated February 26, 1998. This was authorized by the Soil Conservation and Domestic Allotment Act, 16-590; the Department of Agriculture Reorganization Act of 1994, Public Law No. 103-354; and the Secretary's Memorandum No 1010-1, dated October, 1994.

Resource Conservation Districts in the state of California are blessed with very strong powers and authority. At the County level, the RCD Directors are elected or appointed officials. At the State level, the Resource Conservation District is empowered under the Public Resources Code. At the Federal level, the power source for the RCDs is the Standard State Soil Conservation Districts Law, and the Farm Bills.

Whereas: Madera County is a Home Rule County as authorized by the Constitution of the United States of America.

Whereas: The U.S.D.I, National Park Service [NPS] is authorized by Congressional Laws, and entrusted by the American people to plan, and administer the public lands within Yosemite National Park for the benefit of the people.

Whereas: The NPS has clearly violated the trust, honesty, scientific and professional standards entrusted to this Agency.

Whereas: The recommendations of this plan are based on incomplete or non-existent plans, and non-scientific or professional standards, and appear driven by offices of the current Executive Branch of Government and the Secretary of the Department of Interior.

Whereas: This Plan and lack of supporting documents has a time table perceived to be Politically driven, without honesty and true concern over the environment of the Region or the comments of the people who own the land.

Whereas: This Plan is discriminatory to the type of people, uses, economics, social, and cultural values which have historically been a part of these properties.

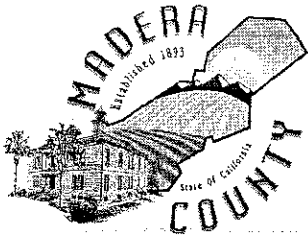
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JUL 06 2000

Therefore be it resolved:

1. The Coarsegold Resource Conservation District, and the Grass-Roots Partners are opposed to the Draft Yosemite Valley Plan.
2. The soon to be newly elected administration by implementation of the Presidential Executive Order is to immediately nul and void any Record of Decision completed this Calendar Year on this Plan.
3. The Congress of the United States is requested to stop any financial budget items which will implement any portion of the Plan.
4. The CRCDD request Legal Standing on this Plan and the Merced River Plan.
5. The CRCDD supports the position of the Madera County Board of Supervisors, Yosemite-Sierra Visitors Bureau, and the Eastern Madera County Chamber of Commerce in rejection this Draft Yosemite Valley Plan.

Ronald Severe, President



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JUN 30 2000

YOSEMITE NATIONAL PARK

BONNIE HOLIDAY, Clerk of the Board

June 27, 2000

David Mihalic, Superintendent
Yosemite National Park
P. O. Box 577
Yosemite, California 95389

Dear Superintendent Mihalic:

The Madera County Board of Supervisors has already submitted formal comments on the Draft Yosemite Valley Plan in our letter of June 13. Since our opposition to the Draft Plan and all five alternatives was unanimous, we believe we have a responsibility to suggest an alternate two-part strategy as documented below.

PREPARATION OF SCIENTIFIC BODY OF KNOWLEDGE

Define the visitor experience and its intrinsic relationship to the esthetic, scenic, historic, archaeologic, and scientific features or "core values" of Yosemite National Park. Resource-focused opportunities unique to a national park setting, based on resource preservation as opposed to resource exploitation, provide the framework for such a definition (e.g., camping as a resource-based activity that requires minimal permanent infrastructure vs. lodging replete with buildings, paved parking, and a host of guest services requiring additional employees/housing). Do swimming pools, pizza parlors, bars, equipment sales/rentals, etc. contribute to the uniqueness of Yosemite Valley or are they an intrusive "fragment of suburbia"? What is the base level of services to be provided in the Valley and what is the base level of employees required?

Establish a sound scientific base of information that documents the resources that are protected and preserved in the park, the condition of those resources; any changes in condition over time; and actions needed to ensure preservation. According to National Park Service Director Robert Stanton, "Preserving our natural resources far into the future now requires active and informed management based on sound science." An aggressive Inventory and Monitoring Program needs to be in place FIRST to provide information critical to the planning process-not within five years after a Record of Decision. Under the direction of practicing scientists, volunteers could certainly assist in gathering data.

Y-4284

Initiate carrying capacity studies that will scientifically document amount of visitor use an area can sustain before negatively impacting resources. Studies should also present a well-defined variety of options that will enable land-use to continue but perhaps under altered circumstances. Such research (though continually monitored) should be conducted FIRST, in preparation for planning—not within five years after a Record of Decision.

Refine process for collecting statistics at the entry gates. Since a major part of the planning effort appears to be based on annual visitation, it is critical that those numbers be clearly defined. The current method of relying on underground mechanical "counters" that (when operable) are unable to delineate between visitors, employees, and vendors other than by formula needs to be reexamined for validity.

Complete any and all sociological studies that will scientifically support visitor use planning assumptions including recreational patterns of low income and non-Anglo populations, visitor demand and attitudes, etc. Such studies should be part of a comprehensive Visitor Experience and Resource Protection study conducted FIRST, in preparation for planning—not within five years after a Record of Decision.

Complete the design of the "Traveler Information and Traffic Management System" and "Accessibility Plan" FIRST, in preparation for planning—not within five years after a Record of Decision. All projects that could have a secondary influence on Valley traffic circulation (e.g., out-of-Valley parking areas, visitor centers at the gates, etc.) should also be included.

Conduct in-depth study of ALL in-valley structures, evaluating possibilities for removal (e.g., Federal Court, NPS/YCS management housing, retail facilities, etc.).

Complete any additional studies deemed critical to the decision-making process FIRST, in preparation for planning (e.g., exhaustive air quality studies under variety of conditions, water quality studies, geological studies, comprehensive capital asset management plan with potential for gate fee allocations, etc.).

SPECIAL NOTE: Consistent with our previous communication, a legally adequate Merced River Management Plan must be in place affirmed with a Record of Decision—before scoping can begin on a Draft Yosemite Valley Plan. Participation (or lack thereof) in the Merced River Plan review process would indicate that the public did not fully understand that the river Plan would ultimately amend the General Management Plan and become the enabling authority for the Draft Yosemite Valley Plan. There are serious concerns about the scientific credibility of the management prescriptions outlined in the Draft Merced River Plan as well as the apparent lack of carrying capacity research. Since a final version of the Plan has yet to be released, there is no closure as to how those issues have been resolved. Therefore, we suggest it is appropriate to revisit the Merced River Plan.

FIVE-YEAR INTERIM PLAN FOR YOSEMITE VALLEY

The Madera County Board of Supervisors suggests a five-year interim plan for Yosemite Valley to address issues of immediate concern. During this interim period, preparation and planning for a well-researched and fully-informed comprehensive Draft Yosemite Valley Plan can be conducted. Such a Plan will encompass

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broad-based public involvement and will be presented in its entirety with all projects detailed within its context. Recommendations during the interim include:

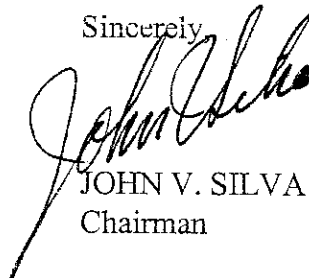
- Replace aging in-Valley diesel shuttle fleet with non-diesel vehicles immediately. Diesel is NOT an acceptable fuel of choice. Explore a full range of traffic management options to guarantee that the ultimate solution is not worse than the problem.
- Expand in-Valley shuttle route to include Bridalveil Fall and Four Mile Trail.
- Implement aggressive "Ride the Shuttle" campaign; would include restricting overnight visitors to assigned parking, requiring YCS/NPS employees to "bus" to work, informing day visitors to leave vehicle parked until such time as they are ready to leave the Valley.
- Explore creation of traffic management working group that includes shuttle bus drivers, patrol rangers, gate fee personnel, road maintenance, and other employees who have experience working directly with visitors "on the ground;" such individuals usually have a plethora of ideas to improve traffic management/circulation (e.g., signage, parking locations/management, traffic circulation patterns, etc.); group should also be affiliated with development of "Traveler Information and Traffic Management System" design as well as "Accessibility Plan."
- Resolve deplorable employee housing situation by working directly with employees (e.g., fewer services means need for fewer employees; opportunities for shift consolidation; transportation options, etc.). Remove trailers/cabins from parking areas.
- Enforce Mariposa Grove recreational vehicle length restrictions of 23 feet park wide (under premise that vehicles must be able to fit into one parking space). No generators to be used in the Valley from 7 p.m. to 7 a.m.
- Increase ranger presence (or volunteer host/intern), formally and informally, throughout the Valley to showcase education/interpretive role for it is through the latter that visitors learn environmental responsibility. Increase ranger presence (or volunteer host/intern) at areas needing more supervision (e.g., Swinging Bridge, etc.).
- Retain existing lodging (no new units) during interim period. The current mix of 1,260 units represents a significant number of rustic accommodations with minimal employee service requirements. Create "Lodging Advisory Council" to include representation from the gateway communities, the public, environmentalists, the concessionaire, park personnel, etc. to examine lodging issues.
- Retain current mix of campgrounds, striving to increase numbers to pre-flood levels during interim period. Create "Camping Advisory Council" to include members of the camping public, environmentalists, as well as park personnel to work toward resolution of issues of concern to campers.

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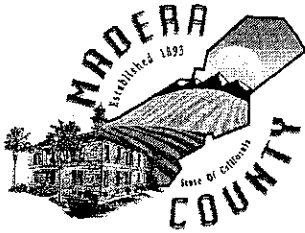
- Evaluate the day visitor parking issue from the environmental, sociological, and traffic management/circulation perspectives. Proposed numbers reflect nearly 2,000 parking places reserved for overnight visitors (20%) and 1,022 spaces for Valley residents, while day visitors (80%) will be channeled into 550 spaces. The expected turnover of day visitor spots appears to be premised on current conditions enabling visitors to park at other locations including roadside turnouts, once that option is removed, it is reasonable to expect visitors will be very hesitant to give up their "golden" parking space. Additionally, trade-offs should be quantified with respect to eliminating roadside parking; though impacting the edge of a meadow, how does such parking compare with the environmental degradation associated with instituting a massive diesel bus system.
- Retain medical clinic in the Valley during interim period pending complete evaluation of medical and emergency services needed by residents and visitors.
- Establish opportunities for inclusive broad-based public participation (including "existing and potential visitors, neighbors, people with traditional cultural ties to park lands, scientists and scholars, concessioners, cooperating associations, other partners, and government agencies" per Director's Order #2) during the five years of plan preparation and development (e.g., quarterly updates at the Park; environmental forums; public advisory council to the planning team with tiering of councils providing input on particular issues such as camping, lodging, etc.).

We trust that you will consider the viability of an interim planning option. Such an option presents an opportunity to complete the necessary research so integral to the planning process. We further encourage you to embrace the value-added benefits of involving a diverse public in plan development rather than postponing their participation to the final comment period. Secretary Babbitt was right about one thing—Yosemite does have a lot of friends, and what better way to harness all that energy in a positive direction than to involve them in a collaborative and cooperative process that could ultimately serve as a planning model for the entire national park system.

Sincerely,



JOHN V. SILVA
Chairman



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JUN 20 2000

BONNIE HOLIDAY, Clerk of the Board

~~YOSEMITE NATIONAL PARK~~

June 13, 2000

David Mihalic, Superintendent
ATTN: Draft Yosemite Valley Plan Review
Yosemite National Park
P. O. Box 577
Yosemite, California 95389

RECEIVED

JUN 26 2000

CAET

Dear Superintendent Mihalic:

The Madera County Board of Supervisors has had an opportunity to review this Draft Yosemite Valley Plan. Though we endorse the concept of a plan that will provide long-term protection and oversight for Yosemite Valley, we unanimously reject the Draft Yosemite Valley Plan that is currently under review. We are especially concerned about the process under which the current Plan was developed and subsequently question its validity.

STATUS OF MERCED RIVER MANAGEMENT PLAN UNKNOWN

It has always been our understanding (as represented in Park Service documents) that the Merced River Plan serves as the underlying foundation for any plan that professes to manage activity in Yosemite Valley. Significant issues were raised with respect to the adequacy of the Draft Merced River Plan and to date, the public has no knowledge as to how any of those issues have been resolved. We find it rather disingenuous that the Park Service found cause to print the Draft Valley Plan before the public comment period for the "foundational" River Plan had even closed; that the final copy of the River Plan won't be released until after the last public hearing for the Draft Valley Plan; and that the Record of Decision determining legal adequacy of the River Plan will not be affirmed until July 31--well after the public comment for the Draft Valley Plan is terminated. Such a timeline befouls the whole

June 13, 2000

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notion of a foundational plan establishing the parameters for a subsequent implementation plan. Such a timeline severely compromises the quality and effectiveness of both plans by short-circuiting and failing to embrace input from the public you serve. Such a timeline would appear to render the current Draft Yosemite Valley Plan invalid.

As a foundational plan, the Merced River Management Plan must address the following:

- A clear definition of the visitor experience and its intrinsic relationship to the esthetic, scenic, historic, archaeologic, and scientific features or "core values" of Yosemite National Park must be articulated. Without such a definition, there will always be conflict between what constitutes resource preservation and resource exploitation/entertainment (e.g., camping as a resource-based activity that requires minimal permanent infrastructure vs. lodging replete with buildings, paved parking, and a host of guest services with expanded employee housing requirements).
- Preparation of a valid Merced River Management Plan must utilize sound scientific data and analysis of the Outstandingly Remarkable Values (ORVs) as inventoried on a mile-by-mile basis along the River corridor (per the Wild and Scenic Rivers Act). Such an analysis is fundamental to providing legitimate management prescriptions that will protect the resources. However, such a resource protection study/monitoring program is instead being proposed as part of the Draft Yosemite Valley Plan to be implemented within five years of its Record of Decision. The River Plan was established as the enabling authority for the Draft Valley Plan not vice versa.
- The Wild and Scenic Rivers Interagency Guidelines (1982) refer to carrying capacity as the "quantity of recreation use which an area can sustain without adverse impact on the outstandingly remarkable values and free-flowing character of the river area, the quality of recreation experience, and public health and safety." The Guidelines further state that "studies will be made during preparation of the management plan and periodically thereafter to determine the quantity and mixture of recreation and other public use which can be permitted without adverse impact on the resource values of the river area. Management of the river area can then be planned accordingly." There is no evidence that any carrying capacity studies were conducted as part of the Merced River Plan.

However, carrying capacity studies are now being recommended as part of the Draft Yosemite Valley Plan to be carried out within five years of its Record of Decision. The River Plan was established as the enabling authority for the Draft Valley Plan not vice versa.

- The Draft Merced River Plan suggested removing air quality from the list of outstandingly remarkable values amidst tremendous public controversy. Since the release of the Plan, the U.S. Environmental Protection Agency, the California Air Resources Board (CARB), the Coalition for Clean Air, the National Resources Defense Council, the National Toxicology Program, and others have publicly announced preliminary rulings and warnings with respect to the deadly effects of diesel emissions. We find it reprehensible that the Draft Valley Plan is now proposing an expanded diesel transportation system (231 in-Valley shuttles, 231 out-of-Valley transit buses, 76+ tour buses, and YARTS) with buses arriving every 1.4 minutes during peak hours at a 16-bay transit center located in the east end of the Valley. It appears that not only is the Park Service willing to place the health of people, plants, and animals at risk-but can the agency really afford another public relations disaster?

Until a scientifically credible, legally adequate Merced River Management Plan has been officially confirmed, any comments/decisions with respect to a proposed follow-on implementation plan are premature and not fully informed.

STATUS OF DRAFT YOSEMITE VALLEY PLAN SCOPING COMMENTS

Well over a year ago, the County of Madera participated in the scoping process for the Draft Yosemite Valley Plan. However, six months after the scoping period closed, a federal judge put the Valley planning process on hold until a long overdue Merced River Management Plan could be completed. As a foundational resource preservation plan that would become the enabling authority for managing Yosemite Valley activity, it would appear that the scoping period for the Draft Yosemite Valley Plan should have been reopened as an opportunity to inform the public about the mandates of this new River Plan and its significance to future Valley planning directions.

Particular concerns noted by the County of Madera during the scoping process included:

- Is current and proposed park policy resulting in the creation of economic barriers that discriminate against a vast majority of the American public? What is the relationship between income level and ethnicity?

Prior to preparation of the Draft Yosemite Valley Plan, park studies revealed that "the largest percentage of visitors to Yosemite National Park (26%) have an annual household income greater than \$100,000; the smallest proportion of visitors (less than 5%) have an annual household income less than \$20,000" (Gramman, 1992). Such statistics should abhor any manager of a publicly funded facility, yet the Draft Yosemite Valley Plan now proposes a 50% reduction in campsites, a 70% reduction in rustic overnight accommodations, and targets day visitors for dependence on transit-recognizing that bus passengers historically spend more money in the Park.

The Draft Valley Plan further notes; "There is an under-representation of low income and non-Anglo visitors to the park. However, the overnight accommodation and recreation patterns of low income and non-Anglo park visitors have not been studied in detail. As a result, the impacts to low income and minority overnight and day visitors cannot be analyzed quantitatively. However, it may be assumed that low income visitors visitation patterns tend toward the more inexpensive methods: day visits, camping, housekeeping, and tent cabin rentals. Therefore, changes to the future service capacity of these facilities may be expected to impact low income visitors who would likely be displaced from staying overnight within the park." The County of Madera finds the above-stated "non-approach" absolutely unacceptable. (As an aside, it is interesting to note: "...the proposed changes to visitors services are projected to have a long-term, major beneficial net financial impact on the concessionaire's gross revenues.")

- Will a transit system in Yosemite Valley and the outlying areas actually result in preservation of the environment?

The Draft Valley Plan concedes that the proposed urban-designed mass transit system will result in more asphalt pavement, more road widening and realignment, more smog and pollution, more crowding, more sprawl parkwide, and more supporting infrastructure than currently exist (e.g., 16-bay transit center, 10-acre vehicle check station, etc.). CARB studies show that diesel buses emit

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1,500% more smog-forming nitrogen oxides than autos and 3,000% more particulate matter. Park Service studies show about a third of the conifers below 6,000 foot elevation already are seriously injured or dying due to air pollution. Though there is promise held out for alternative fueled vehicles sometime in the future, the Park clearly states: "Given the operating environment (altitude, weather extremes, topography, rough roads, maintenance facilities, fuel availability, etc.), internal combustion engines are currently the most reliable method of transportation." And finally, electric buses are "technically and economically infeasible." As environmentalist David Brower states: "Declining Yosemite visitation even amid economic boom times, has limited true auto congestion to only three or four days a year in Yosemite. Limited congestion is not worth the tradeoff of the National Park Service getting into the diesel bus business."

The County of Madera finds unacceptable any mass transit system that puts the environment of Yosemite National Park or our gateway corridors at risk.

- What effect will Park Service management decisions have on the economic and environmental health of established gateway communities?

Recalling the decision by Park administrators in 1980 to "promote visitor services and accommodations at sites more appropriate to the preservation of Park values and the public interest through coordinated regional planning and encouragement of private enterprise outside the Park" (GMP, p.10), we see no evidence of such planning in the Draft Valley Plan. The Plan has redefined the term "local communities" to represent Wawona, Yosemite West, Yosemite Valley, Foresta and El Portal--all within/on Park boundaries--and makes no effort to address the socioeconomic impacts beyond those boundaries. Such a narrow definition would appear to violate the spirit and intent of the Sierra Nevada Ecosystem Project which underscores the interrelation of resource decisions being made by land management agencies throughout the Sierra Nevada. There is also frequent reference to a significant number of proposed development projects immediately adjacent to the perimeters of the Park (e.g., Hazel Green, Silvertip Village, Yosemite West, Yosemite Motels, etc.) raising the question as to whether park planning decisions are actually fostering and facilitating corridor sprawl--thereby placing a fragile and

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sensitive ecosystem at risk.

ADDITIONAL CONCERNS

Though we question the validity of the Draft Yosemite Valley Plan, we do offer the following general comments with respect to its preparation.

- The assumptions upon which the Draft Yosemite Valley Plan is based are not supported by sound scientific study.
- The Draft Yosemite Valley Plan, in a section titled "Issues Beyond the Scope of this Planning Effort," includes a number of projects without design-level specifics, admitting further planning and analysis will be necessary as well as future tiered environmental compliance. Virtually every component of the Plan (i.e., traveler information and traffic management system; Valley visitor/transit center, out-of-Valley parking; visitor centers near park entrances; Indian cultural site; trails; restoration projects; development concept plans for Yosemite Village, Curry Village, Yosemite Lodge, campgrounds, Housekeeping Camp, El Portal, and Wawona; accessibility plan; sociological studies) falls in this category-rendering the Plan incomplete and without substance.
- The transportation system that is the centerpiece of the Draft Yosemite Valley Plan underwent extensive analysis in June 1994 as part of the "Alternative Transportation Modes Feasibility Study." This study was prepared by BRW, Inc. and Dames and Moore under the direction of the Branch of Transportation, Denver Service Center, National Park Service. The study was reviewed by the National Park Service and the U.S. Department of Transportation with appropriate changes incorporated based on those reviews. "The cost, visitor confusion, visitor delay, information challenges, and management difficulties associated with operating remote valley staging areas would be substantial. In return, the benefits would be minor, consisting of moderate decreases in vehicle traffic along sections of park road that are not congested. Perhaps the greatest drawback of remote staging would be the loss of visitors' personal freedom to experience portions of Yosemite at their own pace and in their own way." In comparison charts, the study shows remote in-Park staging areas requiring more than 30 acres for parking development, 60+ buses, nearly \$22 million for construction and equipment costs, and more than \$15 million for annual operating and maintenance costs. Additionally, the average delay to through travelers was

projected to be 1 hour, 37 minutes. "Potentially higher levels of particulate and nitrogen oxides (NOx) emissions would be generated by high volumes of bus travel on park roads." "Increased noise levels on park roads and in the valley would be associated with high volumes of bus travel." "Because of the serious drawbacks of remote staging for valley access," the Park Service's own consultants discarded the concept as a viable option. After such a voluminous study involving so many transportation experts, it is unclear why the remote staging area concept has resurfaced as the underpinning for the Draft Yosemite Valley Plan.

- Transportation system design should be premised on such foundational elements as carrying capacity studies, an accessibility plan, and a traveler information/traffic management system; these elements are not currently available and are listed among those projects requiring further planning and analysis within five years of the Record of Decision. Therefore, the proposed transportation system appears to be without substance and cannot be evaluated as presented.
- With virtually no details available with respect to the various components of the Draft Yosemite Valley Plan, it is interesting to note that the Park Service IS able to include a very specific dollar breakdown. Of the \$343 million request, it appears the majority will support expansion of commercial infrastructure in the Valley and result in a visitor experience that promises to be more costly, more commercialized, and more controlled.

Yosemite National Park is truly one of the most beautiful places on earth and it is a privilege to be a part of planning for its future. Though we recognize the considerable effort that has been invested in both the Draft Merced River Management Plan and the Draft Yosemite Valley Plan, we are concerned the process has become tainted by election cycles and political agendas. We urge the Park Service to restore integrity to the planning process. Yosemite needs a sound, scientifically based Merced River Management Plan that will firmly guide us in protecting precious Valley resources along the River corridor. Once such a plan is developed and deemed legally adequate, we support re-opening the scoping process and subsequent preparation of a comprehensive management plan for Yosemite Valley that clearly outlines specific strategies for the future that will protect the environment AND enhance the visitor experience.

David Mihalic, Superintendent

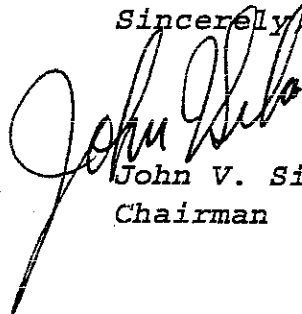
Page 8

June 13, 2000

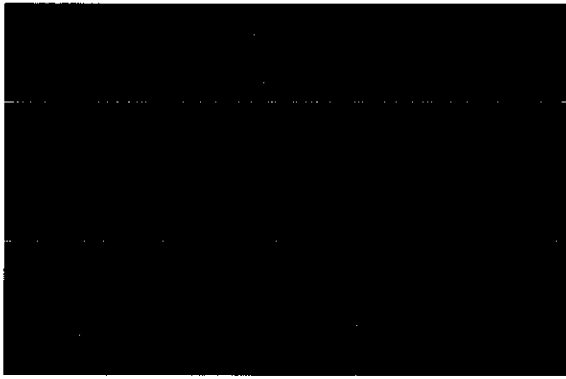
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In conclusion, we enthusiastically endorse the position statement of the Yosemite-Sierra Visitors Bureau and the Eastern Madera County Chamber of Commerce and join them in rejecting this Draft Yosemite Valley Plan. Yosemite deserves better...

Sincerely,

A handwritten signature in dark ink, appearing to read "John V. Silva". The signature is stylized with a large, looping "J" and a long, sweeping underline that extends to the left.

John V. Silva
Chairman



YUPD-7014
RECEIVED

JUL 6 2000

YOSEMITE NATIONAL PARK

COMMUNITY DEVELOPMENT

*P. O. Box 1609 Mammoth Lakes, CA 93546
(760) 934-8989 Ext. 225 Fax (760) 934-8608*

RECEIVED
JUL 08 2000
CAET

July 5, 2000

David A. Mihalic, Superintendent
Yosemite National Park
P.O. Box 577
Yosemite, CA 93589

Subject: Yosemite Valley Plan

Dear Superintendent Mihalic,

Thank you for the opportunity to comment on the Draft Yosemite Valley Plan. These comments have been prepared by the staff of the Town of Mammoth Lakes in accordance with the adopted Town policies including the Strategic Marketing Plan, General Plan, and Vision Statement for the Mammoth Lakes.

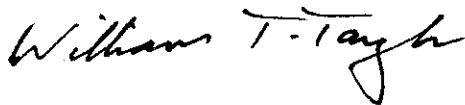
It has been clear for some time that management of the Valley must change to address increasing visitation and the need for resource protection. We appreciate the efforts of the Park Service in the current planning process. The changes in this plan from the 1997 Draft Valley Implementation Plan show that your staff has taken public input seriously and considered it in the revised alternatives.

The Town of Mammoth Lakes is concerned about the quality and accessibility of the visitor experience in Yosemite. Many of our summer guests will choose to visit Yosemite for a day or will stop in the Valley as a part of a tour of the state. Several of the alternatives presented in the Draft Valley Plan appear to maintain or enhance the current level of accessibility and enhance the visitor experience in the valley. The specific proposals that we would like to see maintained in the final plan are:

1. We support the removal of unnecessary facilities from the valley floor. While we recognize that relocating some services and housing from the Valley creates new environmental impacts, we support the goal of restoring the natural environment that has made Yosemite such a special place to visit.
2. Maintenance of or increase in the number of available day parking spaces. Alternatives 2, 3, 4, and 5 all maintain or increase the current number of spaces and, by concentrating them in specific locations, make it more convenient for day visitors to locate appropriate parking. This facilitates day use and enables restoration of significant portions of the Valley floor.
3. It is critical that the new parking and shuttle service be available in advance of or at the same time as the removal of existing day use spaces and relocation of housing and services.
4. Adequate shuttle service from parking lots is important. Shuttle hours from day use parking need to provide access for sightseers, hikers, climbers, and others who want to spend full days in the park exploring or taking in multiple destinations. Shuttle service should start early, end late, and be frequent. As an example, a 7:00 a.m. start time (the current start time) may not be early enough for someone wanting to day hike to Half Dome or other out of Valley destinations.
5. Access for YARTS buses and for 45 foot motor coaches needs to be maintained. This will assure that visitors can conveniently use modes of transportation other than private vehicles to reach the Valley. The larger coaches are commonly used by tour operators providing services to foreign guests.
6. In establishing the Indian Cultural Center, please work with tribes from the east side of the Sierra. The tribes from both the west and east sides used the park, engaged in trade with each other, and intermarried. The proposed cultural center will be most park visitors' only exposure to the park's pre-history and it should represent all of the prehistoric users.
7. Under alternatives 2 or 5, allow tour buses to unload in Yosemite Village as proposed, and under alternative 4, allow tour bus unloading at Taft Toe as proposed.

Thank you again for the opportunity to comment. We look forward to a final plan that enhances the environment of the Valley and maintains a high quality visitor experience.

Sincerely,

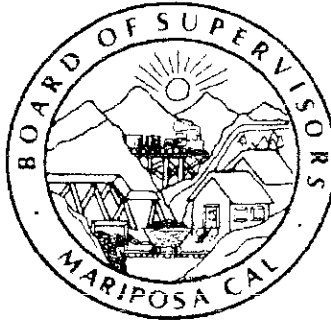


William T. Taylor
Senior Planner

c.c., Town Council

Mariposa County Board of Supervisors

District 1.....PATTI A. REILLY
District 2.....DOUG BALMAIN
District 3.....ROBERT C. STEWART
District 4.....GARRY R. PARKER
District 5.....BOB PICKARD



YUPD 6060
JANET HOGAN
County Administrative Officer

MARGIE WILLIAMS
Clerk of the Board

P.O. Box 784
MARIPOSA, CALIFORNIA 95338
(209) 966-3222
1-800-736-1252

FAX (209) 966-5147

July 6, 2000

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David Mihalic, Superintendent
Yosemite National Park
P.O. Box 577
Yosemite, CA 95389

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JUL 07 2000

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YOSEMITE NATIONAL PARK

Re: Mariposa County Board of Supervisors Comments on the "Draft Yosemite Valley Plan"

Dear Superintendent Mihalic:

Thank you for providing the County of Mariposa with the "Draft Yosemite Valley Plan," hereinafter referred to as "Valley Plan," and the opportunity to comment on the contents. The Valley Plan consists of four voluminous documents together with one document consisting of maps, which relates to the various alternatives in the Valley Plan. As we stated in our letter dated March 23, 2000 to your office relative to the "Merced Wild and Scenic River Plan," we believe that the fast tracking of the Valley Plan that the Federal Government has established for public review and adoption is far too compressed to allow either the Board of Supervisors or the general public sufficient time to review the documentation and make meaningful comments. We therefore request that the Park Service extend the deadline for public comments to be received by a minimum of 90 days.

The Mariposa County Board of Supervisors shares the Park Service's desire that visitors to Yosemite National Park have the best experience possible while still maintaining the integrity of the Park. The County has always been committed, and the Board hereby reaffirms its commitment to cooperate with the Park to ensure that visitors to Yosemite do in fact have the best possible experience while still maintaining the integrity of the Park. As part of that commitment the County will continue to do what is economically feasible to help provide public transportation to and from the Valley.

We strongly believe that the Park Service cannot fulfill its mission without consideration of, and cooperation with, the gateway communities that provide all of the amenities that the Park is unable to provide to its visitors. We make these comments in the spirit of that cooperation between the County of Mariposa and the National Park Service and urge the National Park Service to give serious consideration to our comments.

1. RIVER PLAN

We believe that the preparation of the Valley Plan should have awaited a final review and adoption of the "Merced Wild and Scenic River Plan." We believe that a plan which shapes the future of Yosemite Valley by necessity must be in accord with the adopted plan for the Merced River. To embark upon an in-depth planning process for Yosemite Valley without the benefit of an adopted Merced River Plan seems ill advised.

2. ALTERNATIVES CONTAIN TOO MUCH DISCRETION FOR FUTURE ACTIONS

It is our opinion that all of the alternatives, including the preferred alternative, as was the case with the "Merced Wild and Scenic River Plan," contain too many unknown discretionary actions which



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David Mihalic, Superintendent
Yosemite National Park
July 6, 2000

Page 2

may be taken by the Park Service. Because of the numerous discretionary actions contained within each alternative, it is very difficult for the public to comment meaningfully on the alternatives. As an example, it is unclear when and under what circumstances historic structures may or may not be removed. We respectfully request that the alternatives be tightened up in terms of discretionary activities which may occur in the future but which are not sufficiently delineated at the present time for the public to adequately comment on.

3. PARKING AND OVERNIGHT ACCOMMODATIONS

We believe it is in the public interest to have as much visitor parking and overnight accommodations in the Valley as possible within environmental constraints. It enhances the visitor experience for visitors to be as close as possible to the visitation areas and services. We note in the "Preferred Alternative" of a one-time expenditure of \$343 million in capital and planning efforts, roughly \$5.45 million in annual operating cost increases, and \$11 million annually for operation of an internal transit system. This level of funding assumes 550 parking spaces in the Valley to accommodate all required day use parking during low visitation days from approximately November through February. It has been our experience that there is a problem with traffic congestion in the Valley on several days each year during the peak season. We believe that by increasing the level of parking in the Valley that traffic congestion would be reduced. Further, increasing the level of parking in the Valley should serve in reducing the cost of the expanded transit system.

Additionally, we note in the "Preferred Alternative" that the new baseline for camping facilities is the postflood number of campsites available and not the preflood number of campsites available. It is our opinion that the figures that should be used in the Valley Plan are preflood numbers of campgrounds and campsites. Generally speaking, campers are individuals who prefer to experience nature up close and personal, particularly in a location as beautiful as Yosemite Valley. Additionally, a larger number of campsites assure that individuals with lower median incomes can appreciate the Park on other than a day use basis. We therefore respectfully submit that the Valley Plan should provide for as much visitor parking and overnight accommodations as is possible within the environmental constraints of the Valley. Specifically, we request that the baseline figures for camping be considered preflood rather than postflood.

4. SOCIO-ECONOMIC IMPACTS OF EMPLOYEE RELOCATION

The Valley Plan lacks a complete analysis of the socioeconomic impacts of relocation of personnel to Foresta, El Portal, Wawona and surrounding communities. Additionally, there is a lack of analysis and a failure to recognize that some of those relocated employees will impact other communities. It is not enough to say for example, that law enforcement needs will increase, the Valley Plan should also analyze the way in which the Park Service and the affected local entity acting together can provide the funding needed for additional services. The failure to properly analyze the effects of relocation on surrounding communities indicates a lack of understanding of the services provided to County residents. We believe that, while some of the impacts are addressed, the conclusions contained in the Valley Plan relative to the socioeconomic impacts of relocation are minimized due to the inadequate understanding of the nature of the communities and how services are delivered. By way of example, relocating a significant number of individuals to the El Portal community will significantly impact library services provided by the School District and the County of Mariposa. The library is currently located in school facilities, and any significant increase in use will create conflicts between library users and school

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David Mihalic, Superintendent
Yosemite National Park
July 6, 2000

Page 3

operations. We also believe that by relocating essential services outside of the Valley it exacerbates the very problem that the Park Service is attempting to solve. For example, not having fuel in the Valley requires more, not less, vehicle travel through the Valley. Additionally, failure by the Park Service to provide medical facilities in the Valley will tend to increase traffic flow into and out of the Valley, not decrease traffic flow.

5. WORKSITE RELOCATION

We believe that relocation of employees should coincide with relocation of the worksite itself. There should be an analysis of this type of relocation. Prudent planning directs that employees live close to worksites. Because of the Park Service's desire to relocate a significant number of employees from the Valley, there exists an opportunity to relocate worksites, particularly National Park Service and Concession administrative worksites outside of Yosemite Valley. Such a relocation of worksites and employees would reduce commute time and provide private housing and economic opportunities for surrounding communities. We further believe that with few exceptions, there are no worksite opportunities in Foresta, El Portal and/or Wawona. Relocating employees to these areas will create more circulation problems than currently exists, particularly in inclement weather. We believe that the Valley Plan should identify those jobs and worksites that need to specifically remain in the Valley as well as those jobs and worksites that can accommodate a move outside of the Valley. Additionally, the Valley Plan fails to adequately analyze whether there is sufficient space and infrastructure in Foresta, El Portal or Wawona for appropriate relocation of either employees and/or worksites. In March of 1997 the Mariposa County Board of Supervisors commented on the 1996 "Yosemite Valley Housing Plan." Relative to relocation issues raised in the Housing Plan the County in its comments stated as follows:

"We are also concerned that additional intensity in El Portal will result in unreimbursed, ongoing expenses to the County, including road maintenance, fire protection services, law enforcement, animal control, parks and recreation, and library services."

We believe that the concerns raised in 1997 relative to the Housing Plan are as valid today as they were in 1997. The proposed Valley Plan raises many of the same issues as was raised in the Housing Plan. The County provides, and is required to provide, public services in Foresta, El Portal and Wawona. Additionally, the County provides public services to private properties located in Yosemite West and the Midpines area which lie outside of Yosemite National Park but are nevertheless affected by activities in the Park and will be affected by relocation proposals in the Valley Plan. We believe that the Valley Plan fails to appropriately analyze the processes which county government must follow when Park Service decisions result in actions by county government which are caused by National Park decisions. We submit that the relocation proposals contained in the Valley Plan do not adequately take into consideration the effects such relocation will have in the local communities of Foresta, El Portal and Wawona. Additionally, the Plan does not analyze the effects that will be felt in surrounding communities such as Fish Camp, Midpines and Yosemite West.

6. HOUSING

The Valley Plan proposes relocation of employees to communities surrounding and within the Park boundaries but fails to appropriately analyze the type of housing needed, the cost of the housing, and the effects the additional housing will have on the affected communities. The relocations as proposed appear to place the burden on the National Park Service and the federal

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David Mihalic, Superintendent
Yosemite National Park
July 6, 2000

Page 4

government for establishment of additional housing outside the Valley. We believe that every opportunity should be taken to provide employees with an opportunity to choose private housing outside the Valley and outside the communities of Foresta, El Portal and Wawona and to allow the private sector to respond to the demand, as is conventional in local economies. Private housing would remove the burden of providing costly housing by the Park Service and would additionally help mediate impacts on the Park communities. By way of example, the Park Service proposal contained in the Valley Plan for multiple family housing to be relocated to Wawona is inconsistent with the goals and objectives of the Wawona Specific Plan that the Park Service participated in preparing and approving. Specifically, the adopted goals include: "to provide for a limited and controlled...expansion of the community of Wawona; to provide for limited...residential development...; to ...protect the residential environment of the community; and to maintain the mountain, small community atmosphere of Wawona..." In January of 1990 the Mariposa County Board of Supervisors commented on the "Yosemite General Management Plan Update" relative to the Wawona area. The following comments regarding Wawona were contained in the letter of January 1990.

"The Wawona area has a Plan for the private property within Section 35. The Park Service should consider a similar Plan for its Wawona property within Section 35 for consistency of land use, setbacks, parking and other planning and development requirements. These areas are communities as well as places for 'relocation' of structures. The Park Service should encourage and permit the diversity of ages and interest that are necessary to be healthy viable places to live."

We believe that the Valley Plan does not contain an adequate analysis of the effects upon either the Park communities or communities lying outside of the Park relative to housing for relocated employees. By way of example, increased congestion in El Portal or Wawona would compromise important natural and cultural resources and result in a significant change in the community's character. We suggest that the same degree of effort that was used in assessing impacts in the Valley be used to assess the impacts of decisions that affect the Park communities.

7. PHASING OF PROPOSED PROJECTS

We believe that projects, which will be undertaken if the Valley Plan is approved, should be accomplished in a phased manner in such a fashion that the projects do not disrupt the visitor experience. This would include but not be limited to the Park Service completing a phase prior to the commencement of an additional phase.

8. HISTORIC STRUCTURES

We do not believe that any of the alternatives contained in the Valley Plan establish a compelling reason to remove any historic structures from the Valley. The stone bridges, the superintendent's house, and the apple orchard are examples of structures with a long important cultural history in the Valley. We believe that maintaining these structures will enhance the visitor experience and the cultural historic values of the Park and strongly oppose removal of any of the historic structures in the Valley.

9. FUNDING FOR IMPLEMENTATION OF PLAN

We are concerned about the funding necessary for implementation of the Valley Plan. Needless to say, if only partial funding is available, the effectiveness of the Valley Plan could be

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David Mihalic, Superintendent
Yosemite National Park
July 6, 2000

page 5

severely compromised. With this in mind, our previous suggestions to look to the private sector to provide housing (and worksite locations) merit consideration. For example, the Park Service should concentrate on working with local communities for relocation purposes where infrastructure currently exists which would accommodate the required relocation. Additionally, it would be prudent to develop a phased implementation where each phase "stand on its own," to achieve portions of the Valley Plan's goals.

CONCLUSION

The Board of Supervisors appreciates the opportunity to comment on the Valley Plan and respectfully requests that the Park Service give serious consideration to our comments. Mariposa County stands ready, willing and able and invites the Park Service to partner with Mariposa County to help address the socioeconomic impacts of the Valley Plan as stated in this letter.

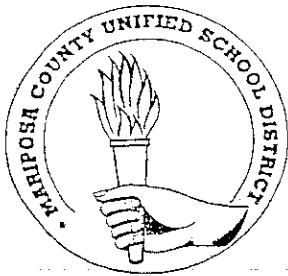
Very truly yours,



Garry R. Parker, Chairman
Mariposa County Board of Supervisors

rs

cc: Congressman George Radanovich
Board of Supervisors
County Administration
Planning Commission
El Portal Town Planning Advisory Committee
Wawona Town Planning Advisory Committee
Fish Camp Planning and Advisory Council
Lisa Edelheit, SEIU



MARIPOSA COUNTY UNIFIED SCHOOL DISTRICT

P.O. Box 8 Mariposa, CA 95338 • (209) 742-0250 Fax (209) 966-4549

YUPD 4498

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JUL 3 2000

YOSEMITE NATIONAL PARK

Jeffrey N. Hamilton, Ed.D.
District Superintendent

June 29, 2000

David A. Mihalic, Superintendent
United States Department of the Interior
National Park Service
P. O. Box 577
Yosemite National Park, CA 95389

DAET RECEIVED

JUL 06 2000

RE: Response to Draft Yosemite Valley Plan

Dear Superintendent Mihalic:

In reviewing the latest draft of the Yosemite Valley Plan and the accompanying documents, it is obvious to the Mariposa County Unified School District that there is still no comprehensive housing plan for employees with school-age children. There is still uncertainty as to where employees of the National Park Service and Yosemite Concession Services will live as well as to where the headquarters and many working facilities will be located.

The District's primary concern is how the three park schools, El Portal, Yosemite Valley and Wawona, will be impacted. MCUSD is committed to providing the best possible education for all of its students, and the Park Service and Concessionaire have acknowledged the need for quality educational services to attract quality employees. State funding mechanisms do not provide adequately for the changes in student population and location that will occur during the implementation of the Yosemite Valley Plan. Therefore, the National Park Service through the Secretary of Interior must reimburse the District for encroachments during this lengthy process.

MCUSD has, in previous responses to prior plans, noted that the National Park Service must be prepared to build additional school facilities where growth occurs. State law establishes the right of parents to have their K-3 students educated at the facility closest to their place of daily employment.

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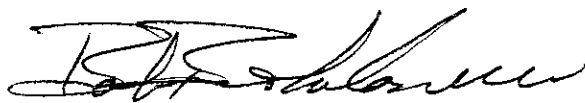
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In reference to Page 2-33 of the Yosemite Valley Plan Executive Summary, it should be noted that the Yosemite National Park Valley School's lease was to be for a period of 25 years from the date of completion of the recent remodel.

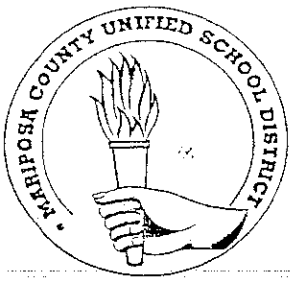
It should also be noted that school buses, for the purpose of the education of District children, must have access at all times to the Park schools.

In conclusion, the time has come for the Department of Interior and the District to engage in dialogue concerning ongoing financial considerations for the many students and families in Mariposa County who are affected by the Park. Please contact me at your convenience.

Sincerely,

A handwritten signature in black ink, appearing to read 'Bob Bartholomew', with a stylized, flowing script.

Bob Bartholomew, Ph.D.
Board of Trustees/Board of Education



MARIPOSA COUNTY UNIFIED SCHOOL DISTRICT

P.O. Box 8 Mariposa, CA 95338 • (209) 742-0250 Fax (209) 966-4549

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JUL 05 2000

CAET

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JUN 30 2000

YOSEMITE NATIONAL PARK

Jeffrey N. Hamilton, Ed.D.

District Superintendent

June 23, 2000

Mr. David Siegenthaler, Park Ranger
Division of Interpretation
Yosemite National Park
P. O. Box 577
Yosemite, CA 95389

Dear Mr. Siegenthaler:

As a follow-up to our conversation after the Rotary Meeting a while back, I am writing you this letter regarding the draft of the Yosemite Valley Plan.

As both District and County Superintendent of Schools, it is my duty to point out areas in the "draft" that is incorrect, flawed or otherwise presenting a problem for the students living in Mariposa County.

1. Page 2-33 Remove the Schools from Yosemite Valley and Use the Building for Other Purposes:

In the last sentence of this section, reference is made to the current school facilities being operated under permit by the Mariposa County Unified School District until 2016. According to my information, the permit in question allows operation until the year 2176.

Please make the appropriate change.

2. Facilities tied to Student Movement:

As long as students live in the Valley, they must continue to have Valley schools in order to meet their educational needs.

Mr. Davis Siegenthaler
June 23, 2000
Page 2

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3. Student Transportation Issues:

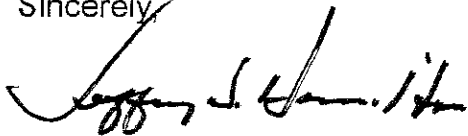
As long as students attend our Valley Schools, our District must have open access to the Valley and surrounding areas for our school buses. These buses must also have Park access in order to transport students in grades 7-12 to and from Mariposa in order to attend middle school and high school.

4. Other Transportation Issues:

Official visitors to our schools must have vehicular access to, from and around the Park. Sanctioned visitors to our schools must have vehicular access to, from and around the Park.

Thank you for seeing that these modifications are made to the Yosemite Valley Plan. Please call me if you have any questions.

Sincerely,



Jeffrey N. Hamilton, Ed. D.
Superintendent of Schools

jh/dt

YVPD-10161

PLANNING DIVISION
Mono County Community Development Department

P.O. Box 347
Mammoth Lakes, CA 93546
(760) 924-5450 Fax 924-5458
monocounty@qnet.com

P.O. Box 8
Bridgeport, CA 93517
(760) 932-5217 Fax 932-5246
northmono@qnet.com

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JUL 11 2000

YOSEMITE NATIONAL PARK

July 5, 2000

David A. Mihalic, Superintendent
Yosemite National Park
P.O. Box 577
Yosemite, CA

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JUL 14 2000

CAET

RE: Yosemite Valley Plan

Dear Superintendent Mihalic:

Thank you for the opportunity to review and comment on the Yosemite Valley Plan. In reviewing the document, we find that the Actions Common to All Alternatives and the Preferred Alternative are generally consistent with the Yosemite Policy contained in the Mono County Regional Transportation Plan. Your consideration of these following policies in your final plan is requested.

MONO COUNTY RTP YOSEMITE POLICIES

GOAL

Yosemite National Park is a national and world-wide treasure that must be protected and preserved. Bordering the Park's eastern boundary, and serving as its only access point from Eastern California, Mono County is an important component of the Yosemite region. Through its transportation planning efforts, the Mono LTC will assist in the preservation and protection of the Park by strengthening the relationship between the Yosemite region and its eastern gateway.

OBJECTIVE A

Support the Park's mission to preserve the resources that contribute to Yosemite's unusual character and attractiveness: its exquisite scenic beauty; outstanding wilderness values; diverse Sierra Nevada ecosystems; historic resources, including its Native American heritage; and its role in a national conservation ethic. These resources are to be made available for enjoyment, education, and recreation while leaving them unimpaired.

Policy 1: Management of Yosemite's congestion and access should be accomplished in a way that does not adversely affect the quality of life and quality of experience in gateway communities.

- Policy 2: Work cooperatively with the National Park Service to support environmental preservation within the Yosemite region.
- Policy 3: Transit related infrastructure should maximize consideration for the environment.

OBJECTIVE B

Improve opportunities for access by alternative modes (transit, bicycles, pedestrians, air, other non-auto modes).

- Policy 1: In support of YARTS regional transit and other alternative modes for access to Yosemite, encourage multi-modal infrastructure projects that compliment the gateway communities, emphasize alternatives to the auto, and integrate joint use of facilities.
- Policy 2: Encourage the use of alternative travel modes for access into Yosemite, including transit and bicycles, e.g. transit riders should have priority access at Park gates and guaranteed access to the Valley.
- Policy 3: High priority should be given to developing a parking facility in the Crane Flat/Hwy. 120 junction area.
- Policy 4: Maintenance and improvement projects on Hwy. 120 should focus on accommodating alternative transportation modes.
- Policy 5: Encourage Yosemite National Park, Caltrans, and Mono County to work cooperatively to develop bicycle facilities on Hwy. 120 both within and outside the Park.
- Policy 6: Encourage the development of a transit connection between the east side and Tuolumne Meadows.
- Policy 7: YARTS should be designed to accommodate bicyclists and bikes.

OBJECTIVE C

Encourage diversity in visitor destinations and experiences.

- Policy 1: The Yosemite Area Regional Transportation System (YARTS) should be developed and implemented in a way that best supports local economies, including:
- a. Using YARTS to change visitor behavior to include longer stays in the Eastern Sierra.

- b. Encouraging Yosemite National Park to promote a policy of dispersing visitors to other areas in the Park and the gateway communities.
- c. Promoting YARTS marketing efforts to include information about gateway attractions.

Policy 2: Plan for and promote the concept that the Yosemite experience begins in the gateway communities. Marketing the Yosemite experience should be a countywide effort.

Policy 3: Provide facilities that support a diversity of visitors.

OBJECTIVE D

Provide for safe and consistent access between Yosemite National Park and its eastern gateway.

Policy 1: To facilitate visitor travel planning and provide some certainty for local gateway economies, the LTC should work with Yosemite National Park to guarantee opening and closing dates for Tioga Road (Hwy. 120 West).

Policy 2: Promote opening the areas along Hwy. 120 to Tuolumne Meadows as soon as conditions are safe. Provide sewage system alternatives to facilitate this policy.

Policy 3: Consider using pricing mechanisms as a means to fund Tioga Road opening activities.

Policy 4: Accurate and timely information about conditions in the Park should be available in the gateway communities.

Policy 5: Maintenance and improvement projects on Hwy. 120 should focus on improving safety, including providing turnouts to allow for safe stops and passing areas.

OBJECTIVE E

Develop transportation infrastructure that supports access to and within the gateway communities.

Policy 1: Hwy. 120 should remain a trans-Sierra highway open to through traffic.

Policy 2: Support improvements to key access routes to Mono County and the eastern gateway corridors.

Policy 3: Resource management decisions in the Park (e.g. changes in allowable land uses, access, and overnight accommodations) should consider associated impacts to gateway communities and access corridors.

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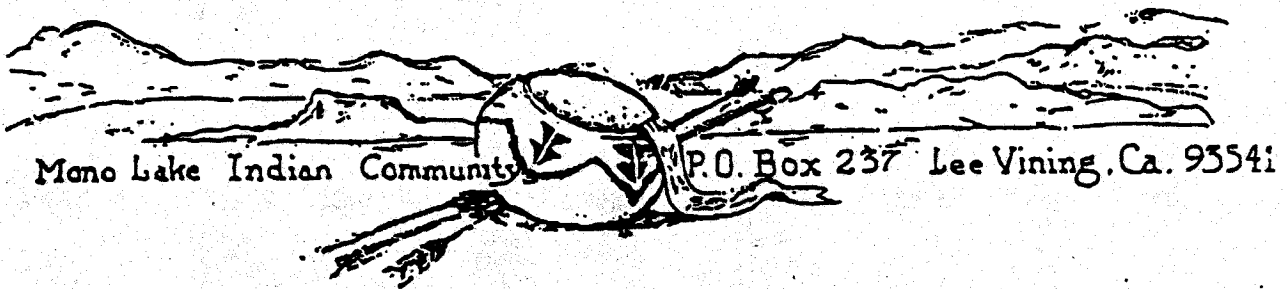
Your presence at the Yosemite Valley Plan workshops held in Mono County was greatly appreciated, as was your staff's well organized and professional presentations. As a follow-up, we have discussed your interest in participating with the Mono County Collaborative Planning Team. The Team is supportive of your participation and has requested that you provide a written request for membership for consideration at a future meeting. A presentation on the Yosemite Valley Plan at their next meeting, scheduled for Friday, July 28 is also requested. I will be following up with a phone call on these Collaborative Planning Team items.

Again, thank you for the opportunity to comment on the Draft Yosemite Valley Plan. We look forward to continued collaborative efforts with Yosemite National Park through both the Mono County Collaborative Planning Team and YARTS. Please give me a call if you have any questions concerning these comments.

Sincerely:

A handwritten signature in black ink, appearing to read 'S. Burns', with a large, sweeping loop at the end.

Scott Burns
Director



August 14, 2000

Dear Laura,

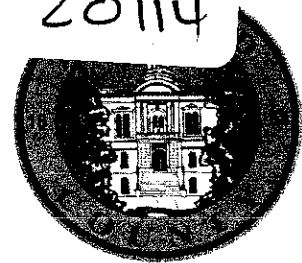
We think the entire collections should remain in the Valley. One reason we want the collections to stay in the Valley is so the public can learn about Indian Culture and have more understanding of that culture. We're affraid if people had to travel to El Portal, they might not make the effort to see it. We would also like to have it remain at it's present location because it is in the beautiful location that the Indians chose to live originally.

Sincerely,

William J. Andrews
Chairman

YUPD - 20114

20114



MERCED COUNTY

BOARD OF SUPERVISORS

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Clerk

May 24, 2000

David Mihalic, Superintendent
Yosemite Valley National Park
Box 577
Yosemite, CA 95389

Dear Superintendent Mihalic:

Merced County is pleased to forward our comments on the Draft Comprehensive Management Plan and Environmental Impact Statement for Yosemite National Park. Our interest in this document deal mainly with the provision for adequate transit service infrastructure for the intended gain in visitor numbers to the Park over the life span of the plan.

The need for a centrally located transit hub located at the Visitor center as displayed in Alternative 2, we strongly support. We believe that by locating the transit hub at the center of visitor activity, the needs of park visitors will be better met than what currently exists. The associated day use parking facility located nearby will also meet the needs of visitors both during the busy summer months as well as in the off-season.

Additionally, the County of Merced is supportive of the proposed staging area on Highway 120 at Hazel Green Meadow. This staging area will allow for visitors to park outside the congested Valley and ride a transit bus from this location which provides service both for east bound and west bound Park visitors. The placement of a staging area on this property also provides for the development of a research station for UC Merced in partnership with the National Park Service's Sierra Studies Institute.

Thank you for considering our comments.

Sincerely,

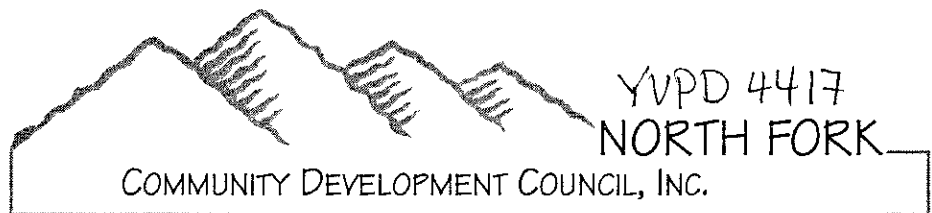

Gerald R. O'Banion, Chair
Merced County Board of Supervisors

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MAY 30 2000

CAET

June 29, 2000



Post Office Box 1484 • North Fork, CA 93643
Tel: (559) 877-2244 • Fax: (559) 877-4267
email: nfdc@sierratel.com

David Mihalic, Superintendent
ATTN: Draft Yosemite Valley Plan Review
Yosemite National Park
P.O. Box 577
Yosemite, CA. 95389

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YOSEMITE NATIONAL PARK

Dear Superintendent Mihalic,

The North Fork Community Development Council is a nonprofit public benefit organization that is dedicated to improving the social, economic and environmental welfare of North Fork; a community located approximately 20 miles south of Yosemite. The Board of Directors of the CDC has reviewed and discussed the Draft Yosemite Valley Plan. Though the board supports the concept of a plan for long-term management of Yosemite Valley, which would both protect the environment and enhance the visitor experience, we believe that the present plan is seriously flawed and should be rejected.

Of particular concern is the planning process, which the Park has followed in developing the Draft Yosemite Valley Plan. The Plan itself states is based on untested assumptions and will pursue policy initiatives based on data yet to be collected. It is our understanding that the Merced River Plan serves as the foundation for the Yosemite Valley Plan, and yet the Yosemite Valley Plan was developed and printed before the public comment period on the Merced River Plan had closed. Furthermore, the Record of Decision determining the legal adequacy of the River Plan will not be affirmed until well after the public comment period for the Valley Plan has been ended. We strongly believe that this timing renders the entire public comment process invalid.

The shift away from low-cost accommodations in the Valley, as envisioned by the Plan, is unacceptable. Although it is true that lodging over all in the Valley will be reduced, there is a proposed 70% reduction in rustic accommodations (e.g. the removal of 212 housekeeping units as well as numerous tent cabins in Curry Village) which coupled with the failure to replace hundreds of campsites lost in the flood, will disproportionately effect available low cost lodging options. Inquiries with Park service personnel have revealed that there are no plans to replace campsites or other lodging elsewhere in the Park. We are further concerned that plans for replacement lodging reflect a 100% increase in upgraded motel style accommodation. As a taxpayer funded facility, Yosemite National Park must ensure balance in affordability and access to people of all income levels.

Though publicly advocating restoration, a review of the preferred alternative reveals that the vast majority of funding will be focused on a wide variety of construction projects (e.g. a

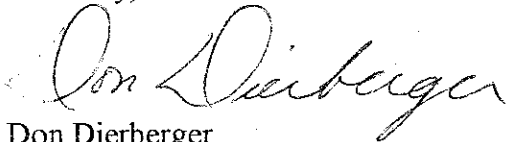
Sports Facility, expansion of Curry Village and Yosemite Lodging, new employee housing, the development of a new Food Service, relocation of the grocery store and more). The Plan further acknowledges that the proposed transportation system will require road widening and realignment as well as supporting infrastructure (e.g. 16-bay transit center, 4-lane vehicle check station, etc.) Such projects appear to support the contention that the Plan will actually expand the development footprint in the Valley rather than "reclaim the priceless beauty" and "allow natural processes to prevail" as its goals suggest.

Of additional concern is that a significant number of projects presented in the Plan have no design level specifics. A section entitled "Issues Beyond the Scope of this Planning Effort," admits that further planning and analysis will be necessary as well as future tiered environmental compliance. Virtually every component of the Plan (i.e. traveler information and traffic management system; the Valley visitor/transit center; out-of-Valley parking; Indian cultural sites; trails; restoration projects; development concept plans for Yosemite Village, Curry Village, Yosemite Lodge, campgrounds, and Housekeeping Camp; accessibility plan; sociological studies) falls into this category- rendering the plan incomplete and thus not ready for public review.

In conclusion, the North Fork Community Development Council must reject the Draft Yosemite Valley Plan as it is presently constituted. While the Council supports a plan that will "preserve the Valley's natural, cultural and scenic resources, and provide a high-quality, resource-based experience for visitors," we strongly believe that the Park Service must restore integrity to the planning process starting with a legally adequate Merced River Management Plan, followed by a high profile public scoping effort that will substantially guide development of a complete and comprehensive Draft Yosemite Valley Plan. This plan should incorporate the necessary studies and supporting data; it should outline project details and ensure environmental compliance; it should embrace public participation throughout the process. Yosemite Valley is a national treasure; the Park Service should take the time necessary to develop an effective management plan through a clear and untainted public input process.

Thank you for your time and consideration.

Sincerely,



Don Dierberger
President

CC:

President Bill Clinton
Senator Barbara Boxer
Senator Dianne Feinstein
Congressman George Radanovich



Temple City Unified School District

YVPO-1338

"A District of Distinguished Schools"

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JUN 1 2 2000

YOSEMITE NATIONAL PARK

June 1, 2000

Superintendent David Mihalic
Yosemite National Park
P. O. Box 577
Yosemite, CA 95389

Dear Superintendent Mihalic:

In response to recent correspondence from our Yosemite Institute Director, Mike Lee, we wanted to take a moment to jot down some of the reasons why we enjoy the *entire* valley experience, every February when we visit Yosemite National Park.

- Staying in the valley we enjoy the beauty of the sun rising over the valley. Walking to breakfast in the morning we experience the changing weather in the valley. We are up at 6:30 AM for breakfast @ 7:00 AM and meet our instructors @ 8:00 AM to begin our day. We experience early morning wildlife, i.e. deer, coyotes, etc. before the valley "wakes up".
- During the evenings, we enjoy the beauty of the moon rising over Half Dome. We ice skate in the village, outdoors! Our evening programs are so special when we take night hikes and see nocturnal animal life. And, of course, the snow falling at night is spectacular to walk through.
- We like being close to medical facilities in the valley, which we have used from time to time.
- The cost of bus transportation daily could possibly increase the cost to our students, which might make it financially impossible to attend Yosemite Institute.
- The time riding in and out of the valley each day would be better spent hiking! One to two hour bus trips are not efficient use of the day and would change the hikes we normally take
- Also, transporting students in and out of the valley each day would add to the pollution problems you are trying to prevent!

In short, Temple City High School has been participating in the Yosemite Institute program for over twenty years, and we cherish the memories we have of our "valley experience". We would like to continue to offer students the special opportunity of "waking up in the beautiful Yosemite Valley". Please consider our concerns.

We are available at any time for added comments or suggestions. Thank you for your attention to this worthwhile endeavor. We enclose two student perspectives.

Sincerely,

Al Langdale
Teacher/Coach/Chaperone
(For over 20 years)

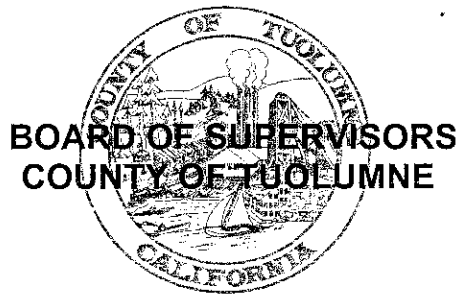
Kathy Mushinskie
Senior School Secretary/Chaperone

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Tuolumne County
Administration Center
2 South Green Street
Sonora, California 95370



YUPD-20293

Edna M. Bowcutt
Clerk of the Board
of Supervisors

Phone (209) 533-5521
Fax (209) 533-6549

Linda R. Rojas
Assistant Clerk

Larry A. Rotelli, *First District*
Mark V. Thornton, *Fourth District*

Don Ratzlaff, *Second District*

Laurie Sylwester, *Third District*
Richard H. Pland, *Fifth District*

June 2, 2000

Yosemite Valley Plan
P.O. Box 577
Yosemite, CA 95389

According to your Valley Plan presentation, Yosemite Park Rangers allowed open-air tour buses to perch precariously on the cliffs at Glacier Point in the 1920s. Rangers allowed people to camp indiscriminately on sensitive meadow lands in the 1930s and 40s. Rangers amused Park visitors by feeding garbage to bears in staged, circus-like events in the 1950s. And, in the 1960s Rangers pushed flaming debris off Glacier Point to entertain overnight guests in Yosemite Valley. With such a management legacy, should we leave Yosemite's future in the care of the National Park Service? I advocate a 6th alternative: return ownership and stewardship of Yosemite Valley to the State of California.

According to a Park Service report, hiring practices within the Park are so lax that people with criminal backgrounds are regularly being employed in Yosemite Valley. According to the General Accounting Office, the Park Service's record in Building and Fire Safety is so bad, that fatalities may have resulted. According to news media accounts the worst fires in New Mexico State history just occurred because of mistakes made by the National Park Service.

In the 1970s, the Park Service failed to prevent social unrest in Yosemite Valley. In the 1980s, the Park Service failed to address traffic congestion caused by a Park Service induced expansion in tour bus visitation. In the 1990s, the Park Service played a contributing role in allowing fires to ravage the landscapes around the entrances to Yosemite Valley.

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June 2, 2000
Yosemite Valley Plan
Page 2

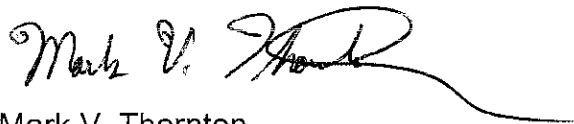
I reject the current draft Valley Plan. The Park Service calls it a "supplemental Environmental Impact Statement" (EIS) but there is no valid foundation EIS. The Park Service provides five so-called "alternatives" but they are all a variation of the same theme: an attempt to validate the 1980 General Management Plan and the implementation of mass transit tourism which that plan doesn't support. The difference between the alternatives is the cost and the speed to which this sell-out of the Park will take place.

Alternative 2, the Park Service's preferred alternative, will lead to more noise, more pavement, more smog, more crowding, and more congestion in the Valley floor, and in the surrounding gateway communities. This proposal represents the greatest intensification of commercialization of Yosemite in the Park's history. Superintendent Mihalic dismisses the issue of diesel emissions as no big thing. Superintendent Mihalic avoids the subject of occupancy limits saying we will have failed if Park gates are closed. Superintendent Mihalic has even gone so far as to compare managing Yosemite Valley as similar to managing Disney World.

Alternative 2 will substantially enhance the profit margin of the Park's private concessionaire, Delaware North. The Secretary of the Interior, Bruce Babbitt, is asking taxpayers to spend over \$350 million with the only clear beneficiary being Delaware North. Mr. Babbitt's long time association with Delaware North further clouds the Yosemite debate. Delaware North is positioned to control access to the Valley. Delaware North is positioned to market Yosemite in a Global economy through a subsidized international sales campaign.

We cannot afford leaving the future of Yosemite in the hands of Mihalic, Babbitt or Delaware North. Say no to Mihalic's folly. Say no to Babbitt Land. Say no to Yosemite World Dot Com. If we return Yosemite to the ownership and stewardship of the State of California, perhaps the California Environmental Quality Act will save this region, otherwise we are left with the National Park Service which refuses to comply with the National Environmental Policy Act.

Sincerely,



Mark V. Thornton
District 4 Supervisor

Tuolumne County
Administration Center
2 South Green Street
Sonora, California 95370



Edna M. Bowcutt
Clerk of the Board
of Supervisors

YVPD 4436

Phone (209) 533-5521
Fax (209) 533-6549

Linda R. Rojas
Assistant Clerk

Larry A. Rotelli, *First District*
Mark V. Thornton, *Fourth District*

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Laurie Sylwester, *Third District*
Richard H. Pland, *Fifth District*

June 28, 2000

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JUL 3 2000

YOSEMITE NATIONAL PARK

David Milhalic, Superintendent
National Park Service
P.O. Box 577
Yosemite National Park, CA 95389

Subject: Response to the Draft Yosemite Valley Plan

Dear Superintendent Milhalic,

Thank you for providing Tuolumne County an opportunity to participate in the shaping of this significant regional planning endeavor. The Tuolumne County Board of Supervisors and the Tuolumne County and Cities Area Planning Council staff has reviewed the Draft Yosemite Valley Plan Supplemental Environmental Impact Statement (YVP) and commends the National Park Service for its efforts in proposing long term stewardship of this precious national treasure. However, we cannot support the YVP as drafted.

1. *Comments are being sought on the YVP prior to a Record of Decision being publicly released regarding the MRP.*

We are deeply concerned about the YVP being circulated for public comment even though a finalized version of the Merced River Plan (MRP) which is considered as a foundational document, has not been completed nor has the public been made aware of the Record of Decision. The public comment period for the YVP terminates on July 7, 2000, well before the July 31, 2000 Record of Decision date on the MRP. The YVP is intended to describe a comprehensive proposal for the management and use of Yosemite Valley through an analysis of the direct and indirect environmental effects of five proposed project alternatives. Until the MRP comments have been analyzed and issues resolved, the YVP cannot be considered as a comprehensive planning document.

2. *The YVP fails to clearly define and justify the economic, air quality or transportation benefit of reducing traffic congestion and parking in the Valley by limiting the number of privately owned vehicles entering Yosemite while increasing diesel-powered buses.*

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The YVP is designed to provide direction and propose specific actions toward preserving Yosemite's natural, cultural and scenic resources. Alternative 1 of the YVP is based upon a continuation of current conditions. Alternative 2, the preferred alternative endorsed by the NPS and Alternatives 3,4 and 5 emphasize diesel-powered bus transportation as the primary mode of visitor circulation in Yosemite. Aside from Alternative 1, the proposed alternatives include the construction of additional infrastructure such as a bus terminal, additional roadway and bridge modifications, and vehicle check points in order to support mass transit. However, these types of "improvements" which will create greater Vehicle Miles Traveled (VMT) and do not utilize the best technology available, are contradictory with Federal, State and regional air quality conformity practices.

3. *Emergency response preparedness to Multiple Casualty Incidents should be analyzed in the YVP.*

Regional bus traffic will significantly increase pursuant to the alternatives being proposed in the YVP. Consequently, bus-related accidents can be expected to increase correspondingly. Air and ground emergency response services are limited in the State Route 120 corridor, and could not be expected to respond to a multiple casualty incident without coordinated assistance. An assessment of Yosemite National Park ingress/egress routes need to be evaluated for adequate staffing, equipment and training levels pertaining to emergency response.

Southside Ambulance stationed in Groveland, operates a single ambulance. Additionally, the nearest emergency response air services originate in Modesto, and only have access to two helipad locations along the State Route 120 corridor, one in Buck Meadows and the other in Ackerson Meadows. The YVP does not address additional support services, training or equipment that will be required on the part of emergency response personnel. Nor does it contain contingency plans for access, transport or medical care of the public in the event of a multiple casualty situation. The safety and wellbeing of the public needs to be made at least equally important as the environment. Consequently, the YVP is incomplete without the commensurate emergency response assessment of the agencies located along the ingress/egress routes.

4. *The YVP should be fiscally constrained and provide a detailed breakdown of funding.*

According to the YVP, congestion management in the Valley should focus on transportation options currently available that have been proven to work well within the Yosemite National Park environment and be cost effective. The YVP, has been drafted to provide direction and propose specific actions. It does not list costs associated with additional analysis, planning or design of such components including a traveler information system, traffic management or carrying capacity studies included in the proposed alternatives. However, a specific total of \$343,000,000 is being sought to implement the Plan. The YVP should identify historical and reasonable future funding levels and be appropriately financially constrained. Otherwise a fragmented

implementation process will occur that undermines the Plan's overall validity and effectiveness in attaining stated goals.

5. *A comprehensive and current assessment of the Valley's carrying capacity in addition to regional transportation, economic and demographic impacts of the Plan's implementation should be included in the YVP.*

According to the 1980 General Management Plan (GMP), a guiding document for the YVP, the amount of parking is adequate to accommodate the number of visitors to the Park. Furthermore, carrying capacity of people in the Park remains undefined. The YVP claims, visitor population (using a 1988 baseline) is estimated to remain unchanged in the future. California and the world population are expected to double in the next twenty years. This is an example of the YVP contradicting one of its primary source documents in addition to an inconsistent use of data and existing studies to promote the NPS's current position regarding implementation of a mass transit in Yosemite.

It is apparent from the information provided in the YVP that fewer campsites would be retained than more expensive accommodations under all proposed alternatives. The loss of campsites is magnified when compared to pre-1997 flood conditions. A large segment of the public can afford only camping for overnight accommodations. More campsites or similarly priced accommodations should be provided in Yosemite Valley than is currently proposed in the YVP to allow more visitors the option to stay overnight.

6. *Economic impacts on gateway communities should be studied.*

The NPS proposes to limit the preferred mode of access, "auto touring" without studying the cumulative impacts of such a policy on gateway communities who rely on tourist dollars for economic viability. The YVP fails to address the potential adverse economic impacts on Groveland and the State Route 120 corridor from reduced tourist traffic to and from Yosemite along this traditional travel route. The YVP also states that decisions on development of a regional transportation system will not be made through the governing powers of the Park. Regional transportation decisions will be made through a coordinated process administered by the Yosemite Area Regional Transportation System (YARTS) or other efforts. The YVP acknowledges cumulative impacts of those plans exist, however no mention of agency coordination regarding regional transportation is discussed in the document. These omissions, which address the inevitability of other Sierra Nevada tourist locations that don't restrict auto access, becoming recipients of displaced and inconvenienced auto tourists at the expense of Yosemite's gateway communities should be investigated.

Tourism is the largest sector of the economy in Tuolumne County. It is by far and away the most important segment of the economy of southern Tuolumne County, specifically the State Route 120 corridor. Adoption of any plan which would disrupt the present ability of the traveling public to access Yosemite Valley by private automobile, would adversely affect businesses and communities located along the State Route 120 corridor. Proposals to develop out of Valley parking facilities and shuttle day visitors to the Valley

would inconvenience motorists. This inconvenience would serve to reduce visitation to Yosemite Valley and consequently, adversely affect businesses located along the State Route 120 corridor.

Similarly, the inconvenience of riding shuttle buses into Yosemite Valley would encourage day visitors to ride tour buses into the Valley from locations outside the Park. This in turn would reduce tourism in gateway communities if tour buses do not stop within those communities. Whereas an individual in a private automobile can stop in a gateway community if he so chooses, that same individual may lose that option if he rides a tour bus into Yosemite Valley for the day. This scenario would negatively impact businesses in gateway communities.

The Caltrans mandate of restricting tour buses in excess of 40 feet in length from traveling along State Route 120, between Groveland and Yosemite National Park, should be addressed in light of Tuolumne County's non-participation in the YARTS process. None of the YARTS affiliated bus services are scheduled to provide dedicated service to this corridor. The only service being mentioned in this region is the Park's shuttle service that transports visitors from a parking facility in Crane Flat to Yosemite. Cumulative impacts stemming from restrictions placed on tour buses along this route creates a lack of direct visitor accessibility to and from Yosemite. These restrictions in conjunction with a lack of an auto touring option will effectively neutralize tourist travel and the economic benefits derived from such activity along the State Route 120 corridor and Groveland. Therefore, a multi-jurisdictional study including elected officials, area merchants and general public involvement from potentially affected regions is in order.

7. *The 1980 GMP should be updated and the Merced River Plan conclusions incorporated into the YVP in a comprehensive manner.*

The 1980 General Management Plan (GMP) is referred to as the guiding document for the YVP. The YVP has an objective of carrying out the goals and objectives of the 1980 GMP as they relate to the Valley with more specific detail. Yet the YVP is drafted as a continuation of processes targeting restrictive planning of the Park and its resources. The YVP appears to be little more than an attempt to validate the 1980 GMP, which is based on 20+ year old data and philosophies. As the primary guiding document for park policies and the YVP, the 1980 GMP should be updated utilizing current and relevant scientific data in order to validate the MRP, prior to be comprehensively incorporated into Park management plans. The best available air quality, traffic calming and congestion management technologies should be incorporated into the YVP.

8. *The best available air quality, traffic calming and congestion management technologies should be incorporated into an Auto Touring Transportation System Management alternative in the YVP.*

The YVP's congestion management philosophy centers on the reduction and removal of privately owned automobiles and auto touring from Yosemite. Despite the historical significance of the private automobile as the most versatile and preferred mode of ground

transportation, motorized touring of Yosemite is to be accomplished primarily by the expanded use of diesel-powered tour buses operated by private firms. Under the preferred alternative, bus trips are anticipated to increase to 231 per day from current peak day levels of 76 trips. Additionally, the travel time under the preferred alternative is projected to increase by 21 minutes per trip over the current condition alternative. Yet, despite these increases, in addition to an increase in Vehicle Miles Traveled (VMT) from construction and subsequent restrictions of roads in the Park, the YVP purports to positively contribute to improving air quality in the Park and regionally. Increases in VMT are contradictory to State Air Quality attainment policies and not in compliance with pending regional ozone reducing objectives being placed on new nonattainment districts. The YVP continues to forge ahead with plans that have not proven to consider or comply with regional air quality attainment standards.

The YVP is intended to describe a comprehensive proposal for the management and use of Yosemite Valley through an analysis of the direct and indirect effects of five proposed project alternatives. However, people carrying capacity studies which were not included in the foundational MRP document, are now being proposed as a subsequent study to the YVP. Furthermore, of the five alternatives presented in the YVP, four are variations of utilizing diesel buses as the primary mode of transportation in Yosemite. An "auto touring" alternative has not been given consideration by the NPS as a viable alternative despite the automobile's status as the preferred mode of achieving accessibility and little documentation that the bus-oriented alternatives will produce congestion relief, improved air quality and enhanced visitor enjoyment of Yosemite. Subsequent Yosemite Valley carrying capacity studies may very well identify visitor thresholds that negate the need for mass transit systems in Yosemite National Park.

According to the YVP, total air emissions would decrease over time due to fleet turnover under the current situation (Alt 1), relating to a long-term negligible minor, beneficial impact. Total air emissions normally refers to mobile and stationary sources unless the term is specifically designated. However, since the term is not clearly defined in the document, it is difficult to quantify the amount of emission reduction applicable precisely to fleet turnover assumptions and those attributable to a specific proposed alternative. Furthermore, the document does not address how any of the alternatives that specify increased diesel bus operations including a dedicated terminal, intend to reduce PM10 impacts and reduce hot spot increases. Facilities that support unusual concentrations of diesel-powered vehicles such as truck and bus terminals, are projects ordinarily subject to PM10 quantitative analysis.

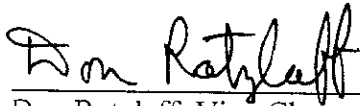
The YVP is being guided by five goals contained in the 1980 GMP. Those goals are to reclaim priceless natural beauty, allow natural processes to prevail, promote visitor understanding and enjoyment, markedly reduce traffic congestion and reduce crowding. With the notable exception of the no action alternative, the Draft Yosemite Valley Plan's preferred and subsequent alternatives contain traffic management conditions designed to limit private automobile accessibility to the Park as a means to achieve two-decade-old goals of the GMP. None of the proposals offered in the YVP indicate a study of auto touring as a viable alternative was considered. Despite concluding that newer

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automobiles emit substantially less pollutants than their 20 year old predecessors, and acknowledging that if the no action alternative was implemented better air quality would be achieved, any auto touring option, has been deemed as inappropriate and non-beneficial. Modern day traffic management and traffic calming techniques have evolved since the 1980 GMP, which combined with recent and future vehicle emission improvements make the GMP obsolete. An auto touring alternative that embraces the most recent traffic management, traffic calming, Air Resources Board vehicle emissions policies and crowd control techniques is at the very minimum a reasonable alternative to be considered.

The Tuolumne County Board of Supervisors and the Tuolumne County and Cities Area Planning Council recognize the effort extended by the National Park Service to include the public in this instrumental planning of Yosemite's future. However, we are deeply concerned that the YVP is fundamentally unsound as a comprehensive planning tool due to its lack of regard of the public comments generated from the MRP. Adherence to the YVP's goals, objectives and conclusions regarding economic, environmental, social and transportation impacts, are likely to lead to irreparable consequences for Yosemite, communities who rely on park related tourism and public trust. This national treasure and the public deserve the best and most comprehensive planning effort available. It's our combined responsibility to deliver such an effort. Until this much deserved level of state of the art planning, scientific analysis and environmental assessment is undertaken, we cannot support the Draft Yosemite Valley Plan Environmental Impact Statement or the Merced River Plan and reject them as sound management plans.

Sincerely,



Don Ratzlaff, Vice-Chairman
Tuolumne County Board of Supervisors

DG/ae

Y430 

 **COPY**



Tuolumne County & Cities Area Planning Council

Peter Rei, R.C.E., P.L.S.
Executive Secretary

A.N. Francisco Building
48 West Yaney Street
Mailing: 2 South Green Street
Sonora, California 95370
Phone # (209) 533-5601
FAX # (209) 533-5698

YVPD-5492

RECEIVED

June 29, 2000

JUL 5 2000

YOSEMITE NATIONAL PARK

David Milhalic, Superintendent
National Park Service
P.O. Box 577
Yosemite National Park, CA 95389

RECEIVED

JUL 07 2000

CAET

Subject: Response to the Draft Yosemite Valley Plan

Dear Superintendent Milhalic,

Thank you for providing Tuolumne County an opportunity to participate in the shaping of this significant regional planning endeavor. The Tuolumne County Board of Supervisors and the Tuolumne County and Cities Area Planning Council staff has reviewed the Draft Yosemite Valley Plan Supplemental Environmental Impact Statement (YVP) and commends the National Park Service for its efforts in proposing long term stewardship of this precious national treasure. However, we cannot support the YVP as drafted.

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We are deeply concerned about the YVP being circulated for public comment even though a finalized version of the Merced River Plan (MRP) which is considered as a foundational document, has not been completed nor has the public been made aware of the Record of Decision. The public comment period for the YVP terminates on July 7, 2000, well before the July 31, 2000 Record of Decision date on the MRP. The YVP is intended to describe a comprehensive proposal for the management and use of Yosemite Valley through an analysis of the direct and indirect environmental effects of five proposed project alternatives. Until the MRP comments have been analyzed and issues resolved, the YVP cannot be considered as a comprehensive planning document.

2. *The YVP fails to clearly define and justify the economic, air quality or transportation benefit of reducing traffic congestion and parking in the Valley by limiting the number of privately owned vehicles entering Yosemite while increasing diesel-powered buses.*

The YVP is designed to provide direction and propose specific actions toward preserving Yosemite's natural, cultural and scenic resources. Alternative 1 of the YVP is based upon a continuation of current conditions. Alternative 2, the preferred alternative endorsed by the NPS and Alternatives 3,4 and 5 emphasize diesel-powered bus transportation as the primary mode of visitor circulation in Yosemite. Aside from Alternative 1, the proposed alternatives include the construction of additional infrastructure such as a bus terminal, additional roadway and bridge modifications, and vehicle check points in order to support mass transit. However, these types of "improvements" which will create greater Vehicle Miles Traveled (VMT) and do not utilize the best technology available, are contradictory with Federal, State and regional air quality conformity practices.

3. *Emergency response preparedness to Multiple Casualty Incidents should be analyzed in the YVP.*

Regional bus traffic will significantly increase pursuant to the alternatives being proposed in the YVP. Consequently, bus-related accidents can be expected to increase correspondingly. Air and ground emergency response services are limited in the State Route 120 corridor, and could not be expected to respond to a multiple casualty incident without coordinated assistance. An assessment of Yosemite National Park ingress/egress routes need to be evaluated for adequate staffing, equipment and training levels pertaining to emergency response.

Southside Ambulance stationed in Groveland, operates a single ambulance. Additionally, the nearest emergency response air services originate in Modesto, and only have access to two helipad locations along the State Route 120 corridor, one in Buck Meadows and the other in Ackerson Meadows. The YVP does not address additional support services, training or equipment that will be required on the part of emergency response personnel. Nor does it contain contingency plans for access, transport or medical care of the public in the event of a multiple casualty situation. The safety and wellbeing of the public needs to be made at least equally important as the environment. Consequently, the YVP is incomplete without the commensurate emergency response assessment of the agencies located along the ingress/egress routes.

4. *The YVP should be fiscally constrained and provide a detailed breakdown of funding.*

According to the YVP, congestion management in the Valley should focus on transportation options currently available that have been proven to work well within the Yosemite National Park environment and be cost effective. The YVP, has been drafted to provide direction and propose specific actions. It does not list costs associated with additional analysis, planning or design of such components including a traveler information system, traffic management or carrying capacity studies included in the proposed alternatives. However, a specific total of \$343,000,000 is being sought to implement the Plan. The YVP should identify historical and reasonable future funding levels and be appropriately financially constrained. Otherwise a fragmented

implementation process will occur that undermines the Plan's overall validity and effectiveness in attaining stated goals.

5. *A comprehensive and current assessment of the Valley's carrying capacity in addition to regional transportation, economic and demographic impacts of the Plan's implementation should be included in the YVP.*

According to the 1980 General Management Plan (GMP), a guiding document for the YVP, the amount of parking is adequate to accommodate the number of visitors to the Park. Furthermore, carrying capacity of people in the Park remains undefined. The YVP claims, visitor population (using a 1988 baseline) is estimated to remain unchanged in the future. California and the world population are expected to double in the next twenty years. This is an example of the YVP contradicting one of its primary source documents in addition to an inconsistent use of data and existing studies to promote the NPS's current position regarding implementation of a mass transit in Yosemite.

It is apparent from the information provided in the YVP that fewer campsites would be retained than more expensive accommodations under all proposed alternatives. The loss of campsites is magnified when compared to pre-1997 flood conditions. A large segment of the public can afford only camping for overnight accommodations. More campsites or similarly priced accommodations should be provided in Yosemite Valley than is currently proposed in the YVP to allow more visitors the option to stay overnight.

6. *Economic impacts on gateway communities should be studied.*

The NPS proposes to limit the preferred mode of access, "auto touring" without studying the cumulative impacts of such a policy on gateway communities who rely on tourist dollars for economic viability. The YVP fails to address the potential adverse economic impacts on Groveland and the State Route 120 corridor from reduced tourist traffic to and from Yosemite along this traditional travel route. The YVP also states that decisions on development of a regional transportation system will not be made through the governing powers of the Park. Regional transportation decisions will be made through a coordinated process administered by the Yosemite Area Regional Transportation System (YARTS) or other efforts. The YVP acknowledges cumulative impacts of those plans exist, however no mention of agency coordination regarding regional transportation is discussed in the document. These omissions, which address the inevitability of other Sierra Nevada tourist locations that don't restrict auto access, becoming recipients of displaced and inconvenienced auto tourists at the expense of Yosemite's gateway communities should be investigated.

Tourism is the largest sector of the economy in Tuolumne County. It is by far and away the most important segment of the economy of southern Tuolumne County, specifically the State Route 120 corridor. Adoption of any plan which would disrupt the present ability of the traveling public to access Yosemite Valley by private automobile, would adversely affect businesses and communities located along the State Route 120 corridor. Proposals to develop out of Valley parking facilities and shuttle day visitors to the Valley

would inconvenience motorists. This inconvenience would serve to reduce visitation to Yosemite Valley and consequently, adversely affect businesses located along the State Route 120 corridor.

Similarly, the inconvenience of riding shuttle buses into Yosemite Valley would encourage day visitors to ride tour buses into the Valley from locations outside the Park. This in turn would reduce tourism in gateway communities if tour buses do not stop within those communities. Whereas an individual in a private automobile can stop in a gateway community if he so chooses, that same individual may lose that option if he rides a tour bus into Yosemite Valley for the day. This scenario would negatively impact businesses in gateway communities.

The Caltrans mandate of restricting tour buses in excess of 40 feet in length from traveling along State Route 120, between Groveland and Yosemite National Park, should be addressed in light of Tuolumne County's non-participation in the YARTS process. None of the YARTS affiliated bus services are scheduled to provide dedicated service to this corridor. The only service being mentioned in this region is the Park's shuttle service that transports visitors from a parking facility in Crane Flat to Yosemite. Cumulative impacts stemming from restrictions placed on tour buses along this route creates a lack of direct visitor accessibility to and from Yosemite. These restrictions in conjunction with a lack of an auto touring option will effectively neutralize tourist travel and the economic benefits derived from such activity along the State Route 120 corridor and Groveland. Therefore, a multi-jurisdictional study including elected officials, area merchants and general public involvement from potentially affected regions is in order.

7. *Rail transportation has been dismissed without adequate consideration.*

The YVP is inclusive in its assessment and subsequent dismissal of all rail transit without an adequate deliberation of the diversified modes of rail transportation available. An explanation of the assessment process including cost estimates, alignment studies, environmental assessments and alternative fuel sources are not incorporated into the YVP. Park officials should involve potential rail providers such as the Sierra Railroad and Amtrak, in discussions pertaining to rail transit's ability to compliment proposed local and regional transportation systems serving Yosemite. The State of California is preparing a Rail Master Plan. A rail alternative should be coordinated with such an effort. The YVP transportation plans should follow federal Major Investment Study procedures that require thorough alternative analysis rather than alternatives that are only variations of one mode of bus transportation.

8. *The 1980 GMP should be updated and the Merced River Plan conclusions incorporated into the YVP in a comprehensive manner.*

The 1980 General Management Plan (GMP) is referred to as the guiding document for the YVP. The YVP has an objective of carrying out the goals and objectives of the 1980 GMP as they relate to the Valley with more specific detail. Yet the YVP is drafted as a continuation of processes targeting restrictive planning of the Park and its resources. The

YVP appears to be little more than an attempt to validate the 1980 GMP, which is based on 20+ year old data and philosophies. As the primary guiding document for park policies and the YVP, the 1980 GMP should be updated utilizing current and relevant scientific data in order to validate the MRP, prior to be comprehensively incorporated into Park management plans. The best available air quality, traffic calming and congestion management technologies should be incorporated into the YVP.

9. *The best available air quality, traffic calming and congestion management technologies should be incorporated into an Auto Touring Transportation System Management alternative in the YVP.*

The YVP's congestion management philosophy centers on the reduction and removal of privately owned automobiles and auto touring from Yosemite. Despite the historical significance of the private automobile as the most versatile and preferred mode of ground transportation, motorized touring of Yosemite is to be accomplished primarily by the expanded use of diesel-powered tour buses operated by private firms. Under the preferred alternative, bus trips are anticipated to increase to 231 per day from current peak day levels of 76 trips. Additionally, the travel time under the preferred alternative is projected to increase by 21 minutes per trip over the current condition alternative. Yet, despite these increases, in addition to an increase in Vehicle Miles Traveled (VMT) from construction and subsequent restrictions of roads in the Park, the YVP purports to positively contribute to improving air quality in the Park and regionally. Increases in VMT are contradictory to State Air Quality attainment policies and not in compliance with pending regional ozone reducing objectives being placed on new nonattainment districts. The YVP continues to forge ahead with plans that have not proven to consider or comply with regional air quality attainment standards.

The YVP is intended to describe a comprehensive proposal for the management and use of Yosemite Valley through an analysis of the direct and indirect effects of five proposed project alternatives. However, people carrying capacity studies which were not included in the foundational MRP document, are now being proposed as a subsequent study to the YVP. Furthermore, of the five alternatives presented in the YVP, four are variations of utilizing diesel buses as the primary mode of transportation in Yosemite. An "auto touring" alternative has not been given consideration by the NPS as a viable alternative despite the automobile's status as the preferred mode of achieving accessibility and little documentation that the bus-oriented alternatives will produce congestion relief, improved air quality and enhanced visitor enjoyment of Yosemite. Subsequent Yosemite Valley carrying capacity studies may very well identify visitor thresholds that negate the need for mass transit systems in Yosemite National Park.

According to the YVP, total air emissions would decrease over time due to fleet turnover under the current situation (Alt 1), relating to a long-term negligible minor, beneficial impact. Total air emissions normally refers to mobile and stationary sources unless the term is specifically designated. However, since the term is not clearly defined in the document, it is difficult to quantify the amount of emission reduction applicable precisely to fleet turnover assumptions and those attributable to a specific proposed alternative.

Furthermore, the document does not address how any of the alternatives that specify increased diesel bus operations including a dedicated terminal, intend to reduce PM10 impacts and reduce hot spot increases. Facilities that support unusual concentrations of diesel-powered vehicles such as truck and bus terminals, are projects ordinarily subject to PM10 quantitative analysis.

The YVP is being guided by five goals contained in the 1980 GMP. Those goals are to reclaim priceless natural beauty, allow natural processes to prevail, promote visitor understanding and enjoyment, markedly reduce traffic congestion and reduce crowding. With the notable exception of the no action alternative, the Draft Yosemite Valley Plan's preferred and subsequent alternatives contain traffic management conditions designed to limit private automobile accessibility to the Park as a means to achieve two-decade-old goals of the GMP. None of the proposals offered in the YVP indicate a study of auto touring as a viable alternative was considered. Despite concluding that newer automobiles emit substantially less pollutants than their 20 year old predecessors, and acknowledging that if the no action alternative was implemented better air quality would be achieved, any auto touring option, has been deemed as inappropriate and non-beneficial. Modern day traffic management and traffic calming techniques have evolved since the 1980 GMP, which combined with recent and future vehicle emission improvements make the GMP obsolete. An auto touring alternative that embraces the most recent traffic management, traffic calming, Air Resources Board vehicle emissions policies and crowd control techniques is at the very minimum a reasonable alternative to be considered.

The Tuolumne County Board of Supervisors and the Tuolumne County and Cities Area Planning Council recognize the effort extended by the National Park Service to include the public in this instrumental planning of Yosemite's future. However, we are deeply concerned that the YVP is fundamentally unsound as a comprehensive planning tool due to its lack of regard of the public comments generated from the MRP. Adherence to the YVP's goals, objectives and conclusions regarding economic, environmental, social and transportation impacts, are likely to lead to irreparable consequences for Yosemite, communities who rely on park related tourism and public trust. This national treasure and the public deserve the best and most comprehensive planning effort available. It's our combined responsibility to deliver such an effort. Until this much deserved level of state of the art planning, scientific analysis and environmental assessment is undertaken, we cannot support the Draft Yosemite Valley Plan Environmental Impact Statement or the Merced River Plan and reject them as sound management plans.

Sincerely,



Cooper J. Kessel, Chairman
Tuolumne County and Cities Area Planning Council