

**concession services plan
environmental impact statement**



Yosemite National Park
California



Printed on recycled paper

final concession services plan environmental impact statement Yosemite National Park • California

supplement to final environmental impact statement
for general management plan

august 1992

This final *Concession Services Plan/Environmental Impact Statement* supplements the 1980 *General Management Plan* and the 1980 *Environmental Impact Statement* for Yosemite National Park, California. Revisions to certain concession services action items of the *General Management Plan* are described, and the environmental consequences of those items are evaluated.

Two alternatives were considered in the draft supplement: alternative A, in which the concession services action items would be implemented as written in the 1980 GMP, and alternative B, the proposed action, in which concession action items of the 1980 *General Management Plan* would be implemented with certain revisions and in which the 1980 plan would be amended for concession services action items only.

In response to public and agency comments, the following major actions of the final proposed action differ from those presented in the draft proposal:

- Parkwide lodging would be reduced by 15.2% rather than by 13.1%.

- Replacement lodging at Yosemite Lodge would be economy cabins and cottages rather than motel units.

- At Curry Village, 150 tent-cabins would be retained, rather than 100.

- No new lodging would be constructed at Wawona.

- The number of parkwide food service seats would be increased to 2,830 rather than to 2,960.

- The Village Grill would remain at the general store rather than being relocated to the Degnan's building.

- The sport/mountaineering shop would be located at Curry Village rather than at the village general store.

- The Glacier Point gift shop and the White Wolf stables would be removed rather than relocated.

- The art activity center would be relocated to the bank building.

- The ice rink would be retained.

- A winter use area would be developed at Crane Flat.

This supplement to the final environmental impact statement contains a statement of findings for the retention of certain structures within the base floodplain of the Merced River, in compliance with Executive Orders 11988 and 12372.

The draft plan/draft supplement to the final environmental impact statement was circulated between December 27, 1991, and February 28, 1992. The 30-day no-action period on this *Final Concession Services Plan/Environmental Impact Statement* will expire 30 days after the EPA has accepted the document and published a notice of availability in the *Federal Register*.

SUMMARY

INTRODUCTION

This final *Concession Services Plan/Supplemental Environmental Impact Statement* represents a planning effort to further define the management of concession services in Yosemite National Park, California (see the Region map). The plan is focused on actions to implement the goals for concession services outlined in the 1980 *General Management Plan: Visitor Use/Park Operations/Development* (GMP). The GMP goals for concession services remain the same (see appendix A).

This document supplements the 1980 GMP and the 1980 *Final Environmental Impact Statement* (EIS). The draft and final GMP and the draft and final EIS are incorporated herein by reference, particularly their analyses of the environmental consequences of concession services alternatives. Those documents are to be considered part of this document. In the earlier documents, a wide range of alternatives for the scope of concession services in Yosemite were considered, from provision of minimal services to substantial increases over existing levels.

The overall scope of services selected in the 1980 documents, subject to action item amendments proposed in this document, continues to represent the appropriate scope of services in response to current circumstances and policy.

The primary revisions to the 1980 GMP and EIS proposed by the National Park Service are (a) an increase in food service seating through redesign of existing indoor space and increased outdoor seating to alleviate crowding and to better meet the needs of visitors, (b) a slightly greater reduction in the number of rooms and a change in the mix of types of rooms, (c)

no expansion of rooms at Wawona Hotel beyond existing levels, (d) retention of Degnan's and the concession warehouse building, and (e) elimination of a GMP proposal to build a new grocery store at Curry Village.

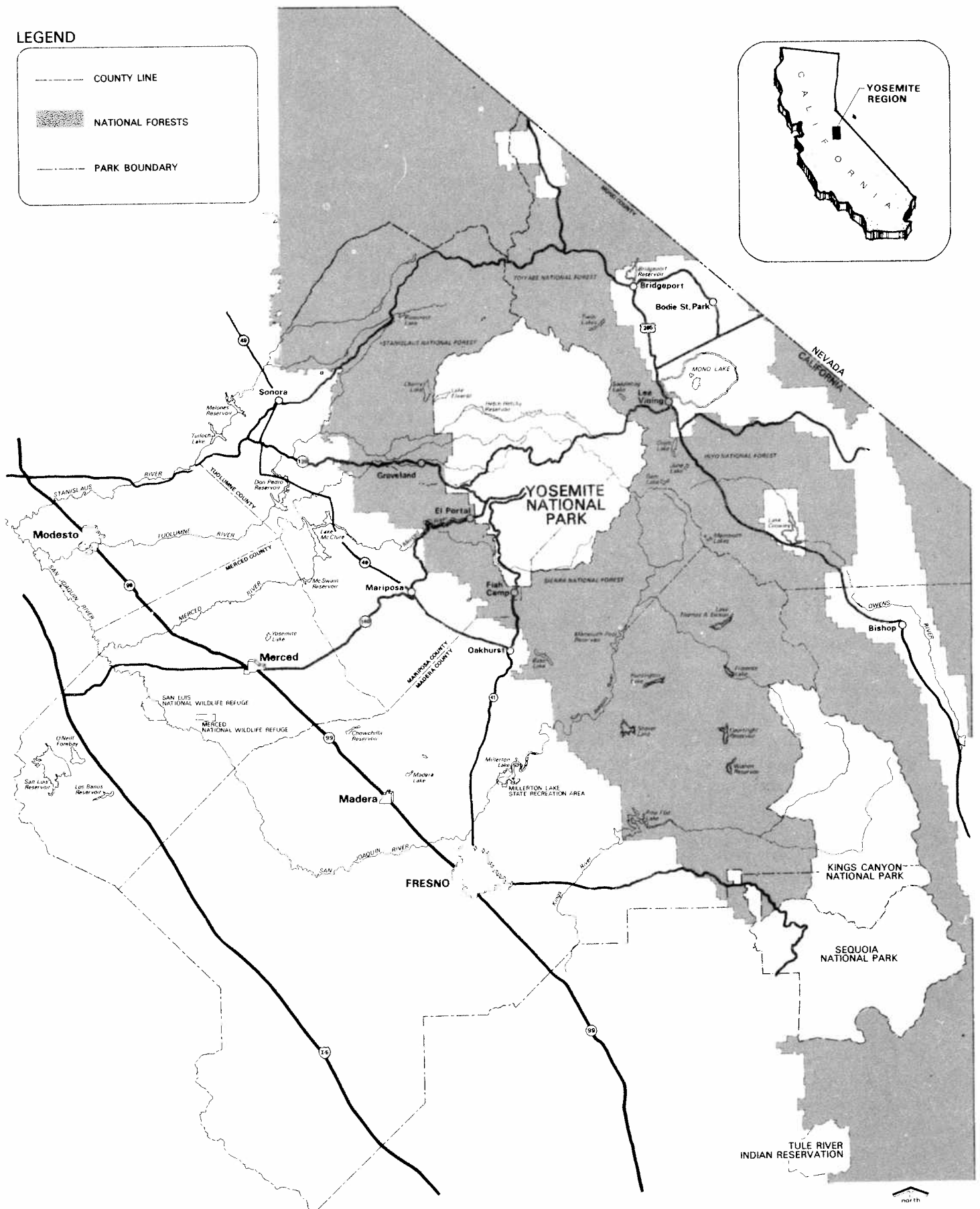
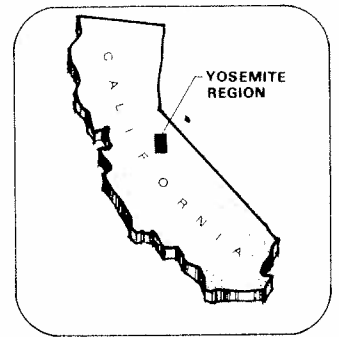
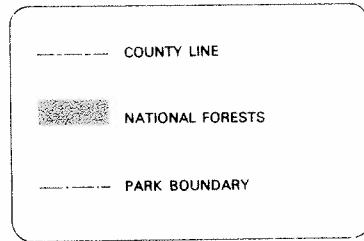
Two alternatives are considered in this document: alternative A, implementation of concession actions as written in the 1980 GMP, and alternative B, the proposed action. Other alternatives, including the no-action alternative and substantial increases or decreases in the 1980 levels of concession services, were fully considered in the 1980 draft and final GMP and EIS and are incorporated into this document by reference. Alternative B is the selected alternative of the National Park Service.

RELATIONSHIP TO THE NEW CONCESSION CONTRACT

The National Park Service is in the process of issuing a new contract for the concession operations currently under contract with the Yosemite Park and Curry Company. That contract will expire on September 30, 1993. The phase 2 *Statement of Requirements* (prospectus) for this new contract is to be released more or less contemporaneously with the release of the final *Concession Services Plan*. The new concession contract will require the concessioner to carry out the requirements of the plan at the direction of the National Park Service. However, the National Park Service will retain the right under the new concession contract to amend the *Concession Services Plan* in the future as it deems appropriate.

Should the *Concession Services Plan* not be finalized prior to the award and/or execution of the new concession contract, the

LEGEND



Region Map

104 | 2006.7B
DSC | DEC 88

National Park Service would proceed with award and execution of the new contract because of the critical need to have this in place upon the expiration of the existing concession contract. In such circumstances, the new concessioner will be required to adhere to the terms of the final *Concession Services Plan* when adopted.

It should be noted that adoption of the *Concession Services Plan*, not the award and execution of the new concession contract, is the federal action that would bring about the environmental consequences discussed in this document. Solicitation and execution of the new concession contract is an environmentally neutral action, as the new concession contract will only authorize concession projects to the extent called for in the *Concession Services Plan* as finalized, or as it may thereafter be amended. Similarly, the concession contract awardee will be subject to actions to be called for in the draft *Yosemite Valley Housing Plan* and other ongoing NPS planning activities when they are finalized and adopted.

ALTERNATIVE A: IMPLEMENT GMP CONCESSION ACTIONS

A summary matrix of existing conditions and alternative actions appears in table 2, page 25.

Lodging

For lodging in the park, the GMP provides for a "full range of overnight accommodations," limiting the parkwide number of accommodations to 1,552 (a 10.5% reduction from 1980) and accommodations in Yosemite Valley to 1,260 (a 17.5% reduction). There would continue to be available a mix of deluxe, midscale, and economy rooms with bath, plus cabins

and tent-cabins without baths. About 43% of the rooms would have baths.

As prescribed in the GMP, the Ahwahnee Hotel would remain at the 1980 number of 121 rooms (the 1991 number is 123); the number of rooms in Yosemite Lodge would be reduced from 481 in 1980 (495 in 1991) to 364, with a mix of lodge rooms and cabins with and without baths. Cabins and one lodge that are in the floodplain would be removed. At Housekeeping Camp, cabins would be reduced from the 1980 number of 300 rooms to 232, and the area would be redesigned. Curry Village would be reduced from 626 rooms in 1980 (the 1991 number is 627) to a maximum of 543 units. The reduction would be in tent-cabins, which would be reduced to a maximum of 335 units, and the area would be redesigned.

Outside Yosemite Valley, the Wawona Hotel complex would continue as now operated, with the number of rooms increased from 72 (in 1980) to 145 units. Tuolumne Meadows would remain at the 1980 level of 66 tent-cabins; at White Wolf the number of tent-cabins would be increased from 9 to 21. The High Sierra camps would continue at the 1980 number of tent-cabins (56).

Conventions, seminars and other group meetings would be allowed subject to guidelines designed to prevent interference with the experience of the general visiting public.

Food Service

Food service seating would be reduced from 2,165 seats in 1980 to 1,910 seats through the removal of the Degnan's building. To reach the total of 1,910, subsequent developed seating also would be removed. All other food services would continue at the locations and sizes existing

SUMMARY

in 1980. The 1980 GMP includes little mention of alcoholic beverage service, except that it indicates one outlet would be removed through the closure of the Degnan's facility. Other beverage services that existed in 1980 would continue.

Merchandise Services

The 1980 plan calls for a reduction in merchandise services in Yosemite Valley. It indicates that the following changes would be made:

Yosemite Village

Pohono gift shop at Yosemite Village converted to another use

Gift shop at Degnan's closed

Gift, clothing, and sport shops at the Village Store removed

Grocery store and Ansel Adams Studio retained

Ahwahnee Hotel

Ahwahnee Gift Shop retained

Curry Village

Gift shop and mountain shop retained

New grocery store building constructed at ice rink site

Yosemite Lodge

Gift shop retained, but clothing sales removed; clothing space used for information/interpretation purposes

Other Areas

Glacier Point gift shop moved to parking lot area

Badger Pass gift and clothing shops retained

Wawona gift shop and store redesigned

Mariposa Grove gift shop removed

New grocery and gift shops added at El Portal

Housekeeping Camp and Crane Flat convenience stores (groceries and gifts) retained

Tuolumne store moved to building now housing gas station

Visitor Activities

The primary concessioner would continue to provide a variety of activities to enhance visitors' experience. Activities offered include bicycle rentals, a mountaineering school, horseback rides, swimming pools, a portable ice rink, alpine and nordic ski schools, alpine skiing facilities, bus tours, and tram tours.

The Yosemite Valley shuttle bus system would be analyzed to determine how service might be improved. The concessioner stables in Yosemite Valley would continue to operate from the present location. As called for in the GMP, adequate support facilities would be provided to accommodate existing levels of winter use at Crane Flat. These would include renovating and winterizing the store, providing equipment rentals, and providing a 200-car parking area. The Badger Pass downhill ski operation would continue.

The GMP called for removal of the Ahwahnee golf course and tennis courts. (The golf course already has been removed.) The golf course and tennis courts at Wawona, public swimming pools at Curry Village and Yosemite Lodge, and the guest pool at the Ahwahnee Hotel would continue to be used.

Other Visitor Services

As detailed in the GMP, the medical facility in Yosemite Valley would be retained as an emergency medical center. Fuel and

minor vehicle service would be available at Yosemite Lodge, El Portal, Wawona, Crane Flat, and Tuolumne Meadows, but the service station at Yosemite Village would be removed. Garage service would be available outside the valley at El Portal. Transportation services would include scheduled bus/tram and shuttle service. Showers would be available at Housekeeping Camp and Curry Village. Limited banking (check cashing and an automated teller machine) at the bank would continue. The barber/beauty shop at the Yosemite Village general store would be discontinued.

Support Operations for the Primary Concessioner

As many of the primary concessioner's support operations as possible would be located out of Yosemite Valley. The primary concessioner's headquarters would be at El Portal. The GMP calls for essential concessioner maintenance functions to be located at the existing NPS maintenance area, and the primary concessioner's warehouse building would be removed. The vehicle garage and repair building at Yosemite Village would be removed.

ALTERNATIVE B: IMPLEMENT GMP CONCESSION ACTIONS WITH REVISIONS (FINAL PROPOSED ACTION)

Alternative B, if adopted, would be an amendment to the 1980 GMP.

Lodging

Lodging would be reduced from 1980 figures by 15.2% parkwide and 20.5% in Yosemite Valley. These are slightly greater reductions than those included in the GMP. The total number of rooms with private baths would be increased from

38% in 1980 to 59% in the proposal. Design criteria, resource preservation considerations, and natural site limitations (such as floodplains and potential rockfall areas) call for the greater reduction to ensure a safe, quality lodging experience.

At Curry Village, tent-cabins would be reduced from the 1980 number of 418 to 150 units, and the units would be clustered or spaced farther apart. All cabins without baths at Curry Village would be replaced by cabins with baths. The number of units at Curry Village would be reduced from 626 to approximately 420. Housekeeping Camp would be reduced to 232 units and redesigned as described in the GMP.

At the Yosemite Lodge complex, all cabins without baths would be removed, as would some other cabins that lie within the floodplain. Pine Cottage would be retained with appropriate floodplain mitigation. Deteriorated cabins would be removed. The number of rooms would be reduced from 495 units to 440. All replacement units would be economy cottages and cabins.

The design of new lodging facilities would follow architectural and design guidelines to be developed for the park. All new units would be designed for energy and water conservation.

The Wawona Hotel complex would remain at the existing level of rooms (104); the number would not be increased to 145 as called for in the GMP. The Ahwahnee Hotel, White Wolf, Tuolumne Meadows, and the High Sierra camps would remain at present capacities.

Food Service

Food service in Yosemite Valley would continue at approximately the present

levels within existing structures, rather than being reduced as indicated in the GMP. Retention of food service in Yosemite Village and provision of redesigned outlets where visitors could get food quickly would reduce visitor travel associated with meal service, allowing more time for visitors to enjoy the park. Studies would be conducted to determine the best design for food service facilities at all locations in the park, including Curry Village and Degnan's.

The Degnan's building would continue to be used for the foreseeable future; its use would be converted totally to food service. The gift shop would be closed and the deli (bulk prepared items and sandwich service) moved to the general store. This would allow a more efficient use of food service space and provide expanded service within the existing footprint. It also would make the addition of more seating possible, which would eliminate congestion of pedestrian walkways and trampling of vegetation. The Village Grill would be retained at the Village General Store.

At Curry Village, the food pavilion, now primarily a cafeteria, would be remodeled, with space added for additional seating. Fast-food operations would be remodeled for more efficient service. Yosemite Lodge food services would be remodeled to improve seating and efficiency. A small restaurant would be added in the Wawona area to help relieve congestion in the existing hotel dining room and to accommodate food service needs for additional users of the expanded campground. A new restaurant would be built at White Wolf and the existing facility converted into a registration desk/office/guest lounge/camp store. The Tuolumne Grill, with additional inside seating, would be included in a new general store at Tuolumne Meadows.

Merchandise Services

Merchandise and retail outlets in Yosemite Valley would be reduced from existing and GMP levels to reduce commercialism and accommodate more essential services. Changes would include combining the Yosemite Village sport shop, the Curry Village mountaineering shop, and other clothing sales into one shop in the area of the existing Curry Village mountaineering shop. The gift section in the Yosemite Village general store would be reduced in size and moved to the area now occupied by the Village Sport Shop. Degnan's gift shop would be closed.

The Ahwahnee Gift Shop would continue as the hotel's gift shop. The Sweet Shop would continue to sell sundries, film, and reading materials. Nonsouvenir clothing would be removed from the Yosemite Lodge gift shop, and the size of the shop would be reduced.

At Curry Village, the bike rental would be moved to the ice rink area. The space now occupied by the bike rental would be used to separate the gift shop from groceries. A deli with bulk prepared items and sandwich service would be added in the additional space allocated to the Curry Village grocery store.

At Glacier Point, the gift shop would be closed and removed. The existing snack bar building would be removed and a new snack bar built near the parking lot.

A new building at Tuolumne Meadows would replace the existing store, grill, and mountaineering center. The camper/grocery stores at Housekeeping Camp, Crane Flat, and Wawona would continue as at present. The White Wolf store would be expanded into part of the current dining room space.

A new souvenir program would be developed that would require all souvenirs to be related in some way to the park, the region, or related cultural and environmental topics. Souvenir shops at Yosemite would serve a twofold mission: providing opportunities for visitors to buy mementos of their park visit and serving as an extension of the park's interpretive responsibilities to the public.

Some gift shops would have specific purposes or themes: the Ansel Adams Gallery would emphasize photography sales and services; the Indian gift shop at Yosemite Lodge would be converted to an environmental shop; and the Wawona Pioneer Gift Shop would refocus on a historical theme..

Visitor Activities

As called for in the GMP, concession visitor activities would be "resource related"; space would not be allocated in Yosemite Valley for "resort activities, since they are not directly related to the significant resources. . . ." The GMP also says that "traditional uses outside of the Valley" would be maintained.

The Ahwahnee golf course has been closed, and the Ahwahnee tennis courts would be removed. Whether rental of river rafts would be continued would be determined after completion of the *Merced River Restoration Plan* and further analysis of impacts. The stables and kennel would be relocated to the Curry dump site. Horseback riding routes would be limited to facilitate interpretive opportunities, to reduce the incompatibility of horses with resources and other uses, and to provide a visitor experience not achievable through driving, bicycling, or other means of transportation.

Activities that would be continued are bicycle rentals, the Curry Village ice rink, a mountaineering school, the art activity center, bus and tram tours, winter use at Crane Flat, alpine and nordic ski schools, and alpine skiing at Badger Pass. The Wawona golf and tennis facilities and the alpine skiing facilities at Badger Pass would be periodically reviewed for potential removal.

Shuttle bus systems at Wawona (begun in 1988), Tuolumne Meadows (begun in 1991), and Yosemite Valley would be analyzed for expansion and improvement of service. Concessioners would be encouraged to join the Park Service in expanded interpretive opportunities (programs, exhibits, tours, historic furnishings).

Other Visitor Services

Concessioner support services for private functions and special events would be reduced or eliminated, depending on their effects on general use of the park by visitors. The public barber/beauty shop at Yosemite Village and the four-hour photo development facility would be closed, and major auto repair service would be moved to El Portal. Services that would be retained are service stations and towing service, showers and laundries, a boarding kennel, an automated teller machine and check cashing service, and recycling centers. The medical facility would be retained primarily as an emergency medical center for visitors and to provide care for employees and local residents.

Services for Employees

Employee services such as food and beverage service, recreation facilities, barber/beauty shops, and counseling services would be provided at employee centers.

Support Operations for the Primary Concessioner

As many concessioner support operations as possible would be moved out of Yosemite Valley. Reservation services and some warehousing for the primary concessioner (Yosemite Park & Curry Company) are already outside the park. Also to be moved from the valley would be the primary concessioner's headquarters (to a new building that would also house the data processing center and sales and marketing offices) and heavy maintenance facilities.

The large garage/vehicle repair building in the village would be removed, as would the former village service station, which is now used as a photo center. Bus parking, fueling, washing and cleaning would be relocated to a transportation staging area to be determined through future valley planning. The concessioner fire station would be removed.

The primary concessioner's warehouse building would be retained for use as a multipurpose support facility housing a reduced warehouse/distribution function, maintenance shops, and recycling equipment. Also moved into this building would be several functions now in the visitor area: the company's security office, an employee uniform center, and a district personnel/payroll/housing office to serve employees housed in Yosemite Valley.

Project Priorities and Cost Estimates

Implementation of project priorities is subject to approved planning and compliance, facility evaluations, interrelationships of projects and funding sources, funding availability, and other factors that may develop over the implementation period.

However, high priorities already exist for actions such as relocation of the primary concessioner's headquarters and some employee housing to a site outside Yosemite Valley and the removal of the Yosemite Village garage and repair facility. The plan includes an implementation schedule in five-year increments.

Concessioner facility costs connected with implementing the primary concessioner's portion of this plan are estimated in current dollars at roughly \$27 million for construction and major repairs to carry out alternative A and \$29 million for alternative B. These estimates include costs of planning, design, and construction supervision; they do not include the costs of employee housing and facilities or as yet unknown costs of major repairs to some existing structures.

Project funding for concession facilities generally would not come from funds appropriated by Congress. Implementation of the concession aspects of the GMP is intended to be carried out from funds provided through concession contract provisions such as funds set aside or invested by the new concessioner in a capital improvement fund. This set-aside fund would be based on a percentage of the concessioner's gross receipts to be determined in the concession contracting process.

The initial contract term would be 15 years, during which time the new concessioner would liquidate the debt resulting from the purchase of the Yosemite Park & Curry Company from MCA. Since the purchase debt would be fully paid at the end of the initial 15-year term, the operation would have an enhanced ability to fund capital improvements for concession-related purposes after the initial 15 years have passed.

CONTENTS

Purpose of and Need for Action	1
Purpose and Need	1
Relationship to the New Concession Contract	3
Relationship to Other Planning Efforts	3
The Scoping Process	5
Alternatives, Including the Proposed Action	6
Alternative A: Implement GMP Concession Actions	6
Lodging	6
Food and Beverage Service	6
Merchandise Services	7
Visitor Activities	7
Other Visitor Services	7
Support Operations for the Primary Concessioner	8
Alternative B: Implement GMP Concession Actions With Revisions (Final Proposed Action)	8
Lodging	8
Food and Beverage Service	10
Merchandise Services	11
Visitor Activities	13
Other Visitor Services	14
Services for Employees	15
Support Operations for the Primary Concessioner	15
Access for Visitors With Disabilities	16
Project Priorities and Cost Estimates	16
Affected Environment	35
Introduction	35
Visitor Use and Concession Facilities and Services	35
Visitation	35
Concessioners	35
Concession Facilities and Services	38
Natural Environment	40
Vegetation	40
Threatened, Endangered, and Sensitive Species	42
Water Resources	45
Floodplains	45
Wetlands	46
Water Quantity	46
Water Quality	47
Wild and Scenic Rivers Values	47
Air Quality	48
Scenic Resources	50
Wilderness	50
Cultural Resources	51
Historic Resources	51
Archeological Resources	51
Local Economies	53

CONTENTS

Environmental Consequences	55
Introduction	55
Alternative A: Implement GMP Concession Actions	55
Impacts on Visitors' Use of Concession Facilities and Services	55
Impacts on Natural Environment	56
Vegetation	56
Threatened, Endangered, and Sensitive Species	58
Water Resources	58
Floodplains	58
Wetlands	59
Water Quantity	59
Water Quality	60
Wild and Scenic River Values	61
Air Quality	61
Scenic Resources	61
Wilderness	62
Impacts on Cultural Resources	62
Historic Resources	62
Archeological Resources	63
Impacts on Local Economies	63
Unavoidable or Irretrievable Commitments of Resources	63
Cumulative Impacts	64
Alternative B: Implement GMP Concession Actions With Revisions (Final proposed Action)	66
Impacts on Visitors' Use of Concession Facilities and Services	66
Impacts on Natural Environment	68
Vegetation	68
Threatened, Endangered, and Sensitive Species	71
Water Resources	72
Floodplains	72
Wetlands	73
Water Quantity	73
Water Quality	74
Wild and Scenic River Values	75
Air Quality	75
Scenic Resources	76
Wilderness	76
Impacts on Cultural Resources	76
Historic Resources	76
Archeological Resources	77
Impacts on Local Economies	77
Unavoidable or Irretrievable Commitments of Resources	78
Cumulative Impacts	78

Consultation and Coordination	88
Scoping History: Issues and Concerns	88
Goals and Actions of 1980 General Management Plan	88
Increases in Visitation	88
Lodging and Food Service	89
Commercial Services and Visitor Activities	89
Concession-Related Visitor Transportation	89
Socioeconomic Concerns	89
Issues Raised But Beyond Scope of Plan	89
Summary of Public Comment on Draft EIS	90
Agencies and Organizations to Whom Draft Was Sent	90
Comments at Public Meetings	92
Written Comments	92
Appendixes	
A: Developed Area Concession-Related Goals	319
B: Air Quality	321
C: Estimated Water Use for Concession Lodging	328
D: Statement of Findings: Floodplains	330
References	333
Preparers and Consultants	335

CONTENTS

Maps

Region	iv
Existing Developed Areas	2
Existing Conditions	19
Alternative A (1980 GMP proposals)	21
Alternative B (Proposed Action)	23

Tables

1: Cost Estimates for Development and Repair by Alternative	18
2: Comparison of Existing Conditions and Alternatives	25
3: Parkwide Lodging and Food Service Comparison Summary	34
4: Visitor Statistics	36
5: Population Income Characteristics, 1990 Tax Years	53
6: Comparison of Environmental Consequences	81

PURPOSE OF AND NEED FOR ACTION

PURPOSE AND NEED

In the 1980 *General Management Plan: Visitor Use/Park Operations/Development* and the *Final Environmental Impact Statement*, a broad array of parkwide issues were addressed. The public was extensively involved in preparation of those documents. A major element of the GMP is the setting of appropriate levels of visitor services provided through concession operations, with a major objective of compatibility with park purposes as well as preservation of environmental processes.

The 1980 GMP contained a series of broad concession goals as well as specific concession goals for each developed area. (See appendix A for concession-related goals for specific developed areas. Also see the Existing Developed Areas map for locations of developed areas.) In this *Concession Services Plan/Supplemental EIS*, no changes have been proposed to any of those goals.

For implementation of goals relative to concession services, tangible action items for each developed area were identified in the 1980 *General Management Plan: Visitor Use/Park Operations/Development* (NPS 1980b). Some of the action items have been implemented, some have been partly accomplished, and some have not been implemented.

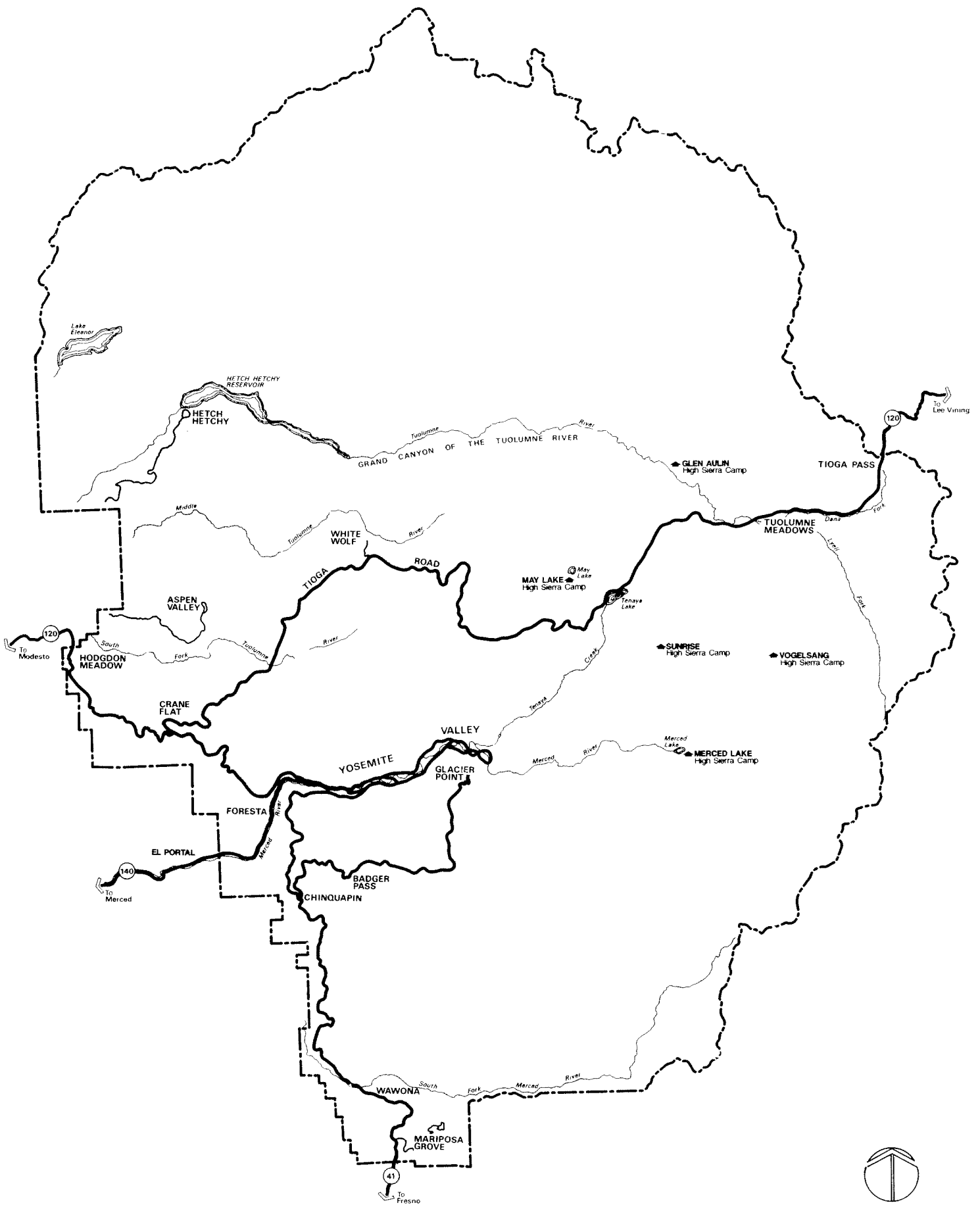
The need to issue four Yosemite concession contracts over the next four years provides a timely opportunity for the Park Service to review specific Yosemite National Park concession services action items and to make adjustments to the plan as necessary. The contracts are Best's Studio (Ansel Adams Gallery), El Portal Chevron, Yosemite Park and Curry Company, and the Yosemite Medical Center.

The primary concessioner's contract, to be awarded in 1993, will require that, to the extent feasible, the concessioner fund portions of the actions in the *Concession Services Plan* as directed by the National Park Service.

This *Concession Services Plan* is intended to provide overall management guidance relative to concession services in Yosemite National Park. Incorporated with the plan is a supplement to the original environmental impact statement (NPS 1980a), as provided for by the regulations of the President's Council on Environmental Quality in 40 CFR 1502.9. It should be noted that the process required for a supplemental environmental impact statement (EIS) is the same as that required for an EIS in general. The *Concession Services Plan* is intended to amend only the portions of the GMP that relate to concession operations. It does not address parts of the GMP that deal with other matters.

In preparing this plan, the National Park Service has reviewed the scope of concession services and facilities adopted through the 1980 GMP process and considers, subject to the modifications as discussed in this document, that it continues to comprise visitor facilities and services that are necessary and appropriate for enjoyment of the park. While visitation has substantially increased since 1980, almost all growth in services for visitors has been outside the park, consistent with NPS policies (see table 4, page 36, and "Local Economies," page 53).

It is NPS policy that concession facilities be limited to those necessary and appropriate for public use and enjoyment of the park and, to the highest degree possible, be consistent with the park's preservation and conservation. In this regard, as in the



EXISTING DEVELOPED AREAS

CONCESSION SERVICES PLAN

Yosemite National Park U.S. Department of the Interior National Park Service



104	40,261
DSC	AUGUST 1991

1980 GMP, the National Park Service is relying on any need for additional visitor facilities beyond those adopted by the general scope of the 1980 GMP to be provided outside the park area.

It is considered, however, that in light of the size of the park, the multitude of visitor attractions in diverse areas of the park, and related time and travel limitations, among other matters, it is not feasible to provide adequate Yosemite visitor facilities and services in areas outside the park. The modifications to the 1980 GMP that are described in this document have been developed in light of NPS policies on concessions facilities and in consideration of these factors and the other environmental issues and concerns discussed in this plan.

RELATIONSHIP TO THE NEW CONCESSION CONTRACT

The National Park Service is in the process of issuing a new contract for the concession operations currently under contract with the Yosemite Park and Curry Company. That contract will expire on September 30, 1993. The phase 2 *Statement of Requirements* (prospectus) for this new contract is to be released more or less contemporaneously with the release of the final *Concession Services Plan*. The new concession contract will require the concessioner to carry out the requirements of the plan at the direction of the National Park Service. However, the National Park Service will retain the right under the new concession contract to amend the *Concession Services Plan* in the future as it deems appropriate.

Should the *Concession Services Plan* not be finalized prior to the award and/or execution of the new concession contract, the National Park Service would proceed with award and execution of the new contract because of the critical need to have this in

place upon the expiration of the existing concession contract. In such circumstances, the new concessioner will be required to adhere to the terms of the final *Concession Services Plan* when adopted.

It should be noted that adoption of the *Concession Services Plan*, not the award and execution of the new concession contract, is the federal action that would bring about the environmental consequences discussed in this document. Solicitation and execution of the new concession contract is an environmentally neutral action, as the new concession contract will only authorize concession projects to the extent called for in the *Concession Services Plan* as finalized, or as it may thereafter be amended. Similarly, the concession contract awardee will be subject to actions to be called for in the draft *Yosemite Valley Housing Plan* and other ongoing NPS planning activities when they are finalized and adopted.

RELATIONSHIP TO OTHER PLANNING EFFORTS

The *Concession Services Plan* is a specific implementing plan tiered from the 1980 GMP/EIS. Tiering allows agencies "to focus on the issues ripe for decision and to exclude from consideration issues already decided or not yet ripe" (40 CFR 1508.28). As stated previously, four Yosemite concession contracts are up for renewal in the near future.

While transportation and employee housing are two concerns that were addressed in the GMP, this plan addresses only the specific action items related to the GMP concession goals. These actions are narrowly focused and not so interrelated with other issues as to preclude independent analysis. However, should these other planning activities result in a need to modify the *Concession Services Plan*, the

PURPOSE OF AND NEED FOR ACTION

National Park Service retains authority to undertake such changes. This authority will be provided for in the Yosemite concession contracts subject to renewal.

The following plans, all produced by the National Park Service unless otherwise noted, are those most directly related to this *Concession Services Plan*.

General Management Plan: Visitor Use/Park Operations/Development (1980)—The GMP includes concession-related broad goals and policies. Area goals and detailed action items for implementation of those goals and policies were further defined (see appendix A).

Draft Environmental Statement (for GMP) (1978) and *Final Environmental Impact Statement* (for GMP) (1980)—Statements include analysis of environmental consequences of several alternatives for management of Yosemite.

Draft Yosemite Valley Housing Plan/Supplemental Environmental Impact Statement (July 1992)—The 1980 GMP calls for a comprehensive plan for housing employees of the National Park Service and the concessioner.

Because of advantages of having the new administrative headquarters near the new employee housing area, housing requirements for employees working in Yosemite Valley and other possible locations are being addressed in concert with administrative headquarters requirements for both the National Park Service and the primary concessioner. Alternative locations being considered for a headquarters site are El Portal and Foresta. Environmental impacts and proposed mitigation will be addressed in the accompanying EIS.

Road System Evaluation/Parkwide Road Engineering Study (1989)—A compre-

hensive improvement plan for all paved roads in the park is presented in this document. The plan is based on an evaluation of physical conditions, safety concerns, and resource considerations. A recommended priority order for improvement projects is included.

Leigh, Scott & Cleary, Inc., *Yosemite Transportation Study* (Denver, 1991)—In this study, environmental and financial effects of additional travel associated with relocating housing are considered, as are transportation alternatives to best accommodate needs and ameliorate impacts of increased travel.

Feasibility Study of Alternative Methods of Transportation (forthcoming)—This congressionally mandated study is underway to evaluate transportation systems and methods of private funding for construction of such systems.

Development Concept Plans—A development concept plan provides guidance for development and use of a specific geographic area of the park. Such plans include early design concepts that outline functional relationships between facilities, utilities, circulation, topography, land use concerns, and resource values.

The 1980 GMP contains fairly detailed guidance for specific areas; however, before final design and construction of a project begins, a development concept plan with required environmental compliance must be prepared. Development concept plans, along with EISs or environmental assessments, have been initiated or scheduled for several areas of the park: Tuolumne Meadows, Mariposa Grove, Yosemite Valley, White Wolf, Wawona, and El Portal.

Resource Management Plan—A draft plan, which has been prepared and

will be available for public review in 1992, revises and updates the existing resource management plan. The plan includes an inventory and description of natural and cultural resources, description and evaluation of the current resource management programs, and prescriptions for an action program based on legislative mandates, NPS policies, management zoning, and other provisions of related planning documents.

River Implementation Plans—Three implementation plans in preparation will address appropriate use and protection of outstanding river values for the main stem of the Merced River, the South Fork of the Merced River, and the Tuolumne River. All of these are components of the National Wild and Scenic Rivers System.

Wild and scenic river management plans are scheduled for these rivers. The plans will be integrated with river implementation plans but will be separately identifiable documents. Implementation plans describe specific actions for protection, enhancement, and restoration of a particular resource. The *Merced River Restoration Plan*, to be completed in 1992, will treat the entire main stem drainage, including drainage from High Sierra camps, Yosemite Valley, and El Portal. The implementation plan for the South Fork of the Merced River, due in 1994, will cover actions affecting the Wawona portion of the river. The Tuolumne River plan, to be finished in 1993, will affect the Tuolumne Meadows developed area.

Statement for Management—This document, which is being revised in 1992, will provide an up-to-date inventory of

the park's condition and analysis of its problems. It will not contain any prescriptive actions for future management, but it will provide a format for evaluating conditions and identifying major issues and information voids.

Interpretive Prospectus: Yosemite National Park—This is an extensive package of proposals for development of interpretive facilities and media. This *Concession Services Plan* is intended to support and complement the proposals in the *Interpretive Prospectus* whenever possible. Interpretive proposals addressed in this *Concession Services Plan* involve orientation/information services, wilderness interpretation and backcountry permitting, and use of souvenir items and recreational activities to help convey the park's major interpretive themes.

THE SCOPING PROCESS

The goal of scoping is to identify public and agency concerns, to define major environmental and other issues and eliminate nonissues, and to gain public input to help determine the scope of the document and the potential impacts that need to be addressed. The scoping process began on July 1, 1991, when an announcement appeared in the *Federal Register* stating the intent of the National Park Service to prepare a concession services plan and supplemental EIS for Yosemite National Park.

The results of the scoping process and the issues considered during the formulation of this supplemental EIS are discussed in detail in the "Consultation and Coordination" chapter.

ALTERNATIVES, INCLUDING THE PROPOSED ACTION

In this plan, two alternative sets of actions for carrying out the concession policies and goals of the GMP are considered. Alternative A consists of the action items described in the GMP. Alternative B, the proposed action, consists of revised actions and original GMP actions. A summary matrix of existing conditions and alternative actions is presented in table 2, page 25. Existing conditions also are portrayed on the Existing Conditions map.

ALTERNATIVE A: IMPLEMENT GMP CONCESSION ACTIONS

Lodging

The GMP calls for a "full range of overnight accommodations" and for limitation of parkwide accommodations to 1,552 rooms (a 10.5% reduction from 1980) and Yosemite Valley accommodations to 1,260 rooms (a 17.5% reduction from 1980). Under alternative A, a mix of types would continue to be provided as described in the GMP; these would include deluxe, midscale, and economy rooms with baths, as well as rooms, cabins, and tent-cabins without baths. About 43% of available rooms would have baths. Also see the Alternative A map near the end of this chapter, on which 1980 GMP proposals for each area are detailed. Table 3, at the end of this chapter (page 34), contains a comparison summary of lodging and food service in Yosemite.

The Ahwahnee Hotel would remain at the 1980 number of rooms (121) under this alternative. Yosemite Lodge, which would continue to be the primary year-round lodging facility in Yosemite Valley, would be reduced from 481 rooms in 1980 (495 rooms in 1991) to 364 rooms, with a mix

of cabins, cabins without baths, and lodge rooms. Cabins and one lodge located in the floodplain would be removed. House-keeping Camp cabins would be reduced from 300 to 232, and the area would be redesigned. The number of rooms in Curry Village would be reduced from 626 in 1980 (627 in 1991) to a maximum of 543 units. The reduction would be in tent-cabins, which would be reduced to a maximum of 335 units, and the area would be redesigned.

Outside Yosemite Valley, the number of rooms in the Wawona Hotel complex would be increased to 145 units. Tuolumne Meadows would remain at the 1980 level of 66 tent-cabins, and the number of tent-cabins at White Wolf would be increased from 13 to 25. The High Sierra camps would continue at the 1980 number of tent-cabins (56).

Conventions, seminars and other group meetings would be allowed subject to guidelines designed to prevent interference with the experience of the general visiting public.

Food and Beverage Service

Food service would be reduced by 250 seats through the removal of the Degnan's building. The pizza and ice cream service at Curry Village (added since 1980) would be closed. All other food services would continue at their 1980 locations and sizes, for a total of 1,910 seats (from 2,725 seats in 1991). The GMP contains little mention of alcoholic beverage services, except that it indicates one outlet would be removed through the closure of the Degnan's facility. Beverage services that existed in 1980 would continue.

Merchandise Services

The GMP calls for a reduction in merchandise services in Yosemite Valley. It indicates that the following changes would be made:

Yosemite Village

Pohono gift shop at Yosemite Village converted to another use (the shop was converted to an art activity center in 1983).

Gift shop at Degnan's closed

Gift, clothing, and sport shops at Village Store removed

Grocery store, Ahwahnee Gift Shop, and Ansel Adams Studio retained

Ahwahnee Hotel

Ahwahnee Gift Shop retained

Curry Village

Gift shop and mountain shop retained

New grocery store building constructed at ice rink site

Yosemite Lodge

Gift shop retained, but clothing sales removed; clothing space used for information/interpretation purposes

Other Areas

Glacier Point gift shop moved to parking lot area

Badger Pass gift and clothing shops retained

Wawona gift shop and store redesigned

Mariposa Grove gift shop removed

New grocery and gift shops added at El Portal

Housekeeping Camp and Crane Flat convenience stores (groceries and gifts) retained

Tuolumne store moved to building now housing gas station

Visitor Activities

The primary concessioner would continue to provide a variety of activities to enhance visitors' experience. Activities offered would include bicycle rentals, a mountaineering school, horseback rides, swimming pools, a portable ice rink, alpine and nordic ski schools, alpine skiing facilities, bus tours, and tram tours.

The Yosemite Valley shuttle bus system would be analyzed to determine how service might be improved. The concession stables in Yosemite Valley would continue to operate from the present location. As called for in the GMP, adequate support facilities would be provided to accommodate existing levels of winter use at Crane Flat. These would include renovating and winterizing the store, providing equipment rentals, and providing a 200-car parking area. The Badger Pass downhill ski operation would continue.

The GMP called for removal of the Ahwahnee golf course and tennis courts. (The golf course already has been removed.) The golf course and tennis courts at Wawona, public swimming pools at Curry Village and Yosemite Lodge, and the guest pool at the Ahwahnee Hotel would continue to be used.

Other Visitor Services

As detailed in the 1980 GMP, the medical facility in Yosemite Valley would be retained as an emergency medical center. Fuel and minor vehicle service would be available at Yosemite Lodge, El Portal, Wawona, Tuolumne Meadows, and Crane Flat, but the service station at Yosemite Village (now used as a photo center)

ALTERNATIVES

would be removed. Automobile repair service would be available outside the valley at El Portal. Transportation services would include scheduled bus/tram and shuttle service. Showers would be available at Housekeeping Camp and Curry Village. Limited banking (check cashing and an automated teller machine) would be retained. The barber/beauty shop at the Village Store would be discontinued.

Support Operations for the Primary Concessioner

As many of the primary concessioner's support operations as possible would be located out of Yosemite Valley. The concessioner's headquarters would be located at El Portal. The GMP calls for essential concessioner maintenance functions to be located at the existing NPS maintenance area. The primary concessioner's warehouse building and the vehicle garage and repair building at Yosemite Village would be removed.

ALTERNATIVE B: IMPLEMENT GMP CONCESSION ACTIONS WITH REVISIONS (FINAL PROPOSED ACTION)

The concessions goals and actions specified in the GMP and in the final proposed action of this *Concession Services Plan* will need to be phased and integrated with other resource management, housing, and transportation actions. At times this integration/coordination will result in interim actions and modifications to targeted ceilings or capacities. As a result, target numbers for rooms, seats, parking spaces, and similar quantifiable actions may be subject to minor modification or adjustment as necessary. It is not anticipated that these minor adjustments would have additional environmental effects. However, site-specific actions will be subject to additional environmental documentation.

Lodging

The GMP calls for a 10.5% reduction of rooms parkwide, with the reduction in Yosemite Valley at 17.5%. Several factors indicate that a further reduction of lodging units in Yosemite Valley is necessary: the need for adequate spacing for privacy and landscaping, resource preservation and restoration considerations, safety restrictions such as floodplain and potential rockfall zones at Curry Village and floodplain at Yosemite Lodge, and lack of suitable sites in the valley. Therefore, a 20.5% reduction from the 1980 GMP is proposed, for a total of about 1,215 units in Yosemite Valley. Parkwide, about 1,472 units are proposed (a 15.2% reduction from 1980). These numbers are subject to minor design-related adjustments.

All new units would be designed according to sustainable design principles, including energy and water conservation. The design of new lodging facilities would follow architectural and design guidelines to be developed for the park.

To meet the "full range" criterion of the GMP, deluxe, midscale, economy, and rustic accommodations would be provided. All new lodging would be economy units. About 65% of park lodging would be economy or rooms without baths/rustic units. Because of visitor preference determined by reservation requests, occupancy rates, and requests for changes in lodging, about 60% of the rooms would have private baths.

Lodging would be available at The Ahwahnee Hotel (deluxe hotel and deluxe cottage), Yosemite Lodge (mid-scale motel and cottages, economy cottages and cabins, and rooms without baths), Curry Village (economy cabins, lodge, and rustic tent-cabins), Housekeeping Camp (rustic housekeeping tent-cabins), Wawona (mid-scale hotel and cottages, and rooms with-

out baths), White Wolf (economy cabins and rustic tent-cabins), Tuolumne Meadows (rustic tent-cabins), and High Sierra camps (rustic tent-cabins). Also see the Alternative B map, page 23.

The traditional character of the Ahwahnee Hotel would be retained. The number of hotel rooms since 1980 has increased by two with the conversion of a former bar into guest accommodations. The number of rooms at the Ahwahnee would remain at the number available in 1991 (99 rooms in the hotel and 24 rooms in cottages). The cottage area would be studied for potential flood mitigation.

Facilities at Curry Village would be consistent with its historical setting. Available space for development is limited by the floodplain and potential rockfall zones. In addition, the tent-cabins are too close to each other. For these reasons, Curry Village would be limited to approximately 150 tent-cabins, 252 cabin units (149 replacement rooms and 103 rehabilitated existing rooms in single, duplex and quad structures), and the 18-room Stoneman House lodge. The tent-cabin area would be redesigned to reduce impacts on resources, and tent-cabins would be spaced or clustered to improve the visitor experience. Additional Curry Village lodging would be available as winter rental units, and food service would be designed for winter use. All cabins without baths would be replaced by economy cabins with baths.

The Yosemite Lodge complex, with 440 units, would continue to be the primary year-round lodging facility in Yosemite Valley. Many cabins are in poor condition and/or are situated in the floodplain. Therefore, 173 cabin rooms would be replaced with about 60 new economy cabin rooms (in duplex or quad structures) and 74 economy cottage rooms (in structures similar in size to the Washburn

at Wawona, the Aspen at Yosemite lodge, or the five-unit Ahwahnee units), all with private baths. Pine Lodge would be retained with appropriate floodplain mitigation. All replacement units would comply with floodplain guidelines.

The number of units at Housekeeping Camp would be reduced to 232, the total specified by the GMP. The area would be redesigned to reduce visual impact, congestion, and environmental damage and to mitigate flood hazards. Structures would be sited to improve aesthetics, spacing, and the quality of the lodging experience.

The Wawona Hotel complex would retain its historic character, with no additional rooms added to the number existing in 1991 (104). The number of hotel rooms has been increased since 1980 through conversion of employee rooms to guest rooms. Existing facilities would be rehabilitated. If some rooms without baths could be converted to rooms with baths during rehabilitation, this would be done. A development concept plan will provide more detailed planning for circulation, parking, employee housing, and other developmental concerns.

The number of units at White Wolf and Tuolumne Meadows would remain at existing levels (White Wolf, 4 cabins and 25 tent-cabins; Tuolumne Meadows, 69 tent-cabins). The High Sierra camps would remain at existing levels of use unless future environmental impacts required removal of a camp or reduction in its size.

As provided in the GMP, conventions, seminars and other group meetings would be allowed during the off-season under NPS concession guidelines and park policies and procedures. However, with increases in general visitor use, the blackout period for conventions and other meetings would be extended.

Food and Beverage Service

A variety of food services would be available for day and overnight visitors. Services would include full-service dining at different price ranges, cafeteria, and fast-food operations. ("Fast-food" outlets provide various types of affordable, convenient food either for take-out or for consumption in or near the facility.)

Food services would be designed to meet the varying needs of day and overnight visitors and located to minimize the need to travel for food services. Increased demand for food service in Yosemite Valley would be met through better use of existing facilities and capacities, including redesign of the existing multi-use outside seating at Yosemite Village and Curry Village. Some of the present outside seating would be enclosed for use in inclement weather, and some facilities would be redesigned to improve service efficiency.

Seating in the Yosemite Valley would remain at about the 1991 level. There would be an increase of approximately 60 seats at Wawona and 30 at Tuolumne Meadows. All proposed changes (objectives, services, design) would be done with professional food service design consultants. Food services would be supplemented by deli operations at the Yosemite Village and Curry Village general stores.

Food service would be available at Yosemite Village (fast-food, restaurant), Ahwahnee Hotel (restaurant), Yosemite Lodge (restaurant, cafeteria, snack bar), Curry Village (fast-food, cafeteria and/or restaurant, Happy Isles snack bar), Wawona (restaurant, snack bar), Badger Pass (fast-food), White Wolf (restaurant), Tuolumne Meadows (restaurant, fast-food), and the High Sierra camps (family style dining). The food services mentioned are centered at overnight locations and at

areas used heavily in daytime (emphasis on lunch) such as Yosemite Village, Curry Village, and the Tuolumne Meadows Grill.

The demand for food service at Yosemite Village necessitates continued use of the Degnan's building for the foreseeable future. In this building would be a redesigned fast-food operation and the Loft restaurant. The space now occupied by the deli and the gift shop would be used for food service purposes, including additional indoor seating. (The deli would be moved to the general store, and the gift shop would be closed.) The fast-food operation would be redesigned to provide faster, more efficient service.

The Village Grill at the general store would continue to operate. Seating locations near Degnan's and the Village Grill would be redesigned for use by visitors with picnic lunches, deli purchases, or fast-food purchases.

The Curry Village food pavilion would be evaluated and redesigned to meet a wide variety of food service needs in that area. Remodeling of the food pavilion would allow for additional inside seating during inclement weather, group meals, and possible use for interpretive programs.

At Yosemite Lodge, the Mountain Broiler patio seating area would be enclosed, increasing inside restaurant seating capacity. This remodeling, along with the reduction in lodging rooms at the lodge, would help reduce the current waiting period for evening meals. A new, smaller Mountain Room Bar would be developed in the restaurant complex, with the existing bar reverting to its former use as a public lounge. The restaurant complex waiting area would be remodeled to reduce the congestion surrounding the interpretive amphitheater at the lodge. A renovation of the Yosemite Lodge cafeteria would improve service efficiency.

The snack bar at Glacier Point would be relocated to a new building near the parking lot. The addition of a 60-seat restaurant at Wawona, separate from the hotel complex, would help relieve congestion in the existing dining room and serve users of the expanded campground.

A new dining facility at White Wolf is needed to serve visitors adequately. The new facility would have 50 indoor seats. The existing facility would be retained for lodging registration and offices, with a lounge for lodge guests and a small camp store. The outbuildings would be removed.

The Tuolumne Meadows Lodge dining room and kitchen would be included in a site farther away from the Tuolumne River. The Tuolumne Grill on Tioga Road would be included in a new grocery store building near the service station, and inside seating would be added. Development at White Wolf and Tuolumne Meadows would be considered in detail in development concept plans for those areas.

Alcoholic beverages would be available with all restaurant meal service and at lodging lounges at the Ahwahnee Hotel, Yosemite Lodge, Curry Village, and Wawona Hotel. They also would be available at the snack bar in the Wawona golf shop. Beer and wine would be available at cafeterias, the Degnan's fast-food outlet in Yosemite Valley, and two Badger Pass winter fast-food outlets. Alcoholic beverages would not be available at Yosemite Valley snack bars or at the remaining fast-food outlets. The bar in the Loft restaurant at Degnan's in Yosemite Village would be closed.

Merchandise Services

Merchandise outlets would be located in the park so as to minimize the use of

personal or other transportation systems. Some types of merchandise shops would be consolidated into one location, shop size reduced, or shops eliminated to reduce commercialism in the park.

Souvenir Shops. The GMP indicates that commercial services in the park should contribute directly to a quality park experience. Thus, souvenir shops at Yosemite National Park would serve a twofold mission: offering opportunities for visitors to buy mementos of their park visit and serving as an extension of the park's interpretive responsibilities to the public. Shops would provide a means for visitors to take home reminders of their park experience by buying gifts and souvenirs related to the park's resources and educational messages.

Gift and souvenir items would have a direct relationship to Yosemite, its environs, its history, or other related environmental or cultural topics. Themes and categories would be identified by the park staff in consultation with the concessioner to implement a park gift mission statement. Gifts and souvenir items commonly found in gift shops outside the park and unrelated to any of the identified themes would not be allowed. Appropriate handcraft items representing park and regional themes, including crafts by American Indian and local artists, would be encouraged and sought.

When possible and appropriate, informative tags showing the relationship of the item to one of the park themes would be attached to sales items as an interpretive/educational effort. Items with park interpretive value and general value in environmental or cultural education would be displayed prominently. A broad price range in gifts and souvenirs would be sought to give visitors opportunities to buy both inexpensive and fine arts items.

ALTERNATIVES

The new souvenir policy and the reduction in size and number of shops would be reflected in the following actions. At Yosemite Village, the Degnan's gift shop would be closed, and the Pohono Gift Shop has already been converted to an adaptive use. At the Yosemite Village general store, the gift and souvenir section would be moved to the current location of the Village Sport Shop, which would result in a reduction of merchandise space. The Ansel Adams Gallery would emphasize Ansel Adams- and park-related photography sales and services. One souvenir shop would be located at each of the following locations: Yosemite Lodge, Curry Village, Ahwahnee Hotel, and Wawona.

The Ahwahnee Gift Shop would continue as the hotel's gift shop. The Sweet Shop would sell sundries, film, reading materials, and personal emergency items. Non-souvenir clothing would be removed from the Yosemite Lodge gift shop, with the exception of emergency clothing items and clothing accessories such as hats. The Indian gift shop at Yosemite Lodge would be converted to a shop with products of environmental educational value. In accordance with the park souvenir policy, representative environmental sales items would also be available at other park locations. To relieve overcrowding, the grocery/gift sales at Curry Village would be separated into two stores within the existing Meadow Deck building.

The Glacier Point gift shop would be closed. Film, sundries, and picnic items would be sold at the relocated Glacier Point snack bar. The Wawona Pioneer Gift Shop would refocus on a historical theme, and the Mariposa Grove gift shop would be removed. Limited souvenir sales as defined in the park gift mission statement would be allowed at park camper/convenience stores at Crane Flat, Housekeeping Camp, White Wolf, and Tuolumne

Meadows, and at Badger Pass when open to the public.

General Merchandise. Outlets would be available to provide general merchandise items necessary for visitors' use and enjoyment of the park. Groceries, photography, camping items, and emergency clothing items and accessories would be available at Yosemite Village, Curry Village, El Portal, Wawona, Housekeeping Camp, Crane Flat, Tuolumne Meadows, and White Wolf. The Yosemite Village general store would continue to carry items needed to support valley residents. Sporting goods and apparel other than souvenir apparel would be limited to one outlet each at Curry Village (combining the Village Sport Shop and Curry Mountaineering Shop), Wawona (golf shop), Tuolumne Meadows, and Badger Pass during winter. Convenience stores would carry a few sporting supplies. Vending machines would be limited to locations where they are necessary to reduce congestion and travel.

The Curry Village grocery store and an added deli would be expanded into space in the existing Meadow Deck building. This would reduce crowding and better serve nearby campers. This reallocation of space would eliminate the need for a new grocery store to be built, as proposed in the 1980 GMP.

The Tuolumne grocery store would be removed and a new building constructed at a site near the service station. That building also would house the mountaineering center and shop now located in the service station and the grill next to the existing grocery store. The development would be considered in detail in a Tuolumne Meadows development concept plan.

Packaged Alcoholic Beverages. Packaged alcoholic beverages are generally sold in grocery and convenience stores in Cali-

fornia, as well as at liquor stores. In Yosemite Valley, packaged beverages would be available at the Yosemite Village general store, the Yosemite Lodge store and gift shop, the Curry Village grocery store, and the Housekeeping Camp camper store. Elsewhere in the park, packaged beverages would be available at the grocery stores at El Portal, Tuolumne Meadows, and Wawona and at the Crane Flat and White Wolf camper stores. Sales of alcoholic beverages would be eliminated at the Ahwahnee Sweet Shop, Yosemite Village deli, and Badger Pass store.

Visitor Activities

Park concessioners would continue to provide a variety of activities to enhance visitors' experience. Concessioner-offered services and facilities include bicycle rentals, a mountaineering school, horseback rides, swimming pools, alpine and nordic ski schools and equipment rentals, alpine skiing facilities, interpretive services, camera safaris, environmental education programs, bus tours, and tram tours.

The Wawona, Tuolumne Meadows, and Yosemite Valley shuttle bus systems would continue to be analyzed for possible expansion and improvement of service. The analysis would include additional bus stops near trailheads and natural features in the park, as well as potential linkage to regional transit systems and major forms of commercial transportation outside the park. Also considered would be alternative forms of transportation conveyances. The potential for partnerships and cooperative ventures with governmental, business, and other entities also would be explored in this analysis.

In addition to shuttle bus operations, review of concession bus and tram tours would continue to determine how routes and schedules might be changed to en-

hance ridership, service, and visitors' experience.

To minimize adverse effects on park experiences, resources, and facilities and to allocate routes and attractions equitably between tour and charter companies, the Park Service would evaluate and implement types of authorizations necessary to regulate this form of transportation.

The Yosemite Valley concession stables would be moved from the present location near two rivers and a major campground to the Curry dump site, pending official closure of the dump site. This action would reduce the visibility of the stables from Glacier Point, restore meadow systems, and eliminate conflicts between stable operations and camping.

Horseback riding routes in Yosemite Valley would be limited to the eastern end and southern side of the valley. This would facilitate interpretive opportunities and reduce the potential conflicts between horses and vehicles, visitors in heavily used areas, and sensitive natural resources. The rides should provide a visitor experience that could not be achieved through driving, bicycling, or other means of transportation. Pony rides would be eliminated.

The National Park Service would conduct a review of horseback rides offered, the size of horse parties, routes, and the location of stables at Wawona and Tuolumne Meadows. The stable operation at White Wolf would be closed.

To support existing levels of winter play use at Crane Flat, the store/gas station would be winterized, including replacement of electric generators with power lines. Winter play rental equipment would be available at the store, as would groceries and other winter use items. Instead of a 200-car parking lot, as called for in the

GMP, a more limited amount of parking would be provided between the store and the Tioga Road winter closure gate to take advantage of existing parking areas, some of which might be expanded or relocated. During the spring nesting season for the great gray owl, parking areas near Crane Flat meadow would be closed, and the meadow would be closed to visitors if monitoring or research demonstrated the need for closure.

Use of the Badger Pass area for downhill and crosscountry skiing would continue; however, skiing operations would be reviewed periodically to determine if activities should continue or be modified as use, environmental considerations, and economics might dictate.

The Ahwahnee golf course has been closed, and the Ahwahnee tennis courts would be removed. Whether river raft rentals would be continued would be determined by the *Merced River Restoration Plan* or by further impact analysis.

The GMP called for the Curry Village ice rink to be removed and a portable ice rink to be used. Under this final proposal, the existing facility would be retained and redesigned for skating use in the winter and for use as a bike and raft rental facility in the summer.

The GMP provides for continuation of the golf course and tennis courts at Wawona, the public swimming pools at Curry Village and Yosemite Lodge, and the guest pools at the Ahwahnee and Wawona hotels. The operation of the Wawona golf course and tennis courts would continue to be reviewed as similar services developed near the park or as effects on park resources might dictate their removal.

Yosemite concessioners would be encouraged to continue and expand interpretive efforts.

The bank building would be used as a new location for the art activity center. The center's existing location would be converted to a wilderness permit office and interpretive center. The Ansel Adams Gallery would continue to offer photography-related activities, including seminars and photography walks.

Other Visitor Services

Private functions such as weddings and special events would be eliminated or reduced depending on their effect on general use of the park by visitors. The "blackout" period for use of facilities for meetings and special events would be reviewed and extended periodically as necessary.

The medical facility in Yosemite Valley would be retained as an emergency medical center for visitors and to provide care for employees and local residents. Service stations would offer fuel (including alternate fuels) and minor repair service at Yosemite Lodge, Wawona, Crane Flat, El Portal, and Tuolumne Meadows. Auto towing service would be available at Yosemite Lodge, El Portal, Crane Flat, and Wawona. Major automobile repairs would be available outside the valley at El Portal.

Concessioner-operated shower facilities would be added at major campgrounds where feasible, to relieve pressure on shower facilities at Curry Village and Housekeeping Camp. The potential for concession operation of campgrounds would be explored in the future.

Other services that would be continued are coin-operated laundries, a boarding kennel, and recycling centers. An automated teller machine and check cashing service would continue, but they would be moved to another location in the village. The Yosemite Village barber/beauty

shop would be closed. The four-hour photo development service would be discontinued and photo supply sales would be moved to the general store from the photo shop (former Yosemite Village gas station), which would be removed. Additional services or facilities considered for authorization in the future would have to demonstrate a positive effect on the visitor experience and few or reduced adverse effects on park resources.

All entities (profit and nonprofit) providing visitor-related services such as educational seminars and tours would have to have written agreements with the National Park Service.

Parking would be provided in accordance with design capacities and guidelines for lodging, food service, and visitor activities, unless mitigated by a transit system.

Services for Employees

Employee services would be provided at employee centers. The remoteness of the park makes it necessary to provide employee housing and, for many employees, dining. The employee centers also would include food and beverage service, recreation facilities, barber/beauty service, and counseling services. Business activities in employee housing areas would not be encouraged, and they would not be permitted if in conflict with park values, residential community ambience, safety, or quiet hours or if they could be self-sustaining outside the park.

Employee housing at Tuolumne Meadows would be relocated away from the Tuolumne River and upgraded. Housing at White Wolf would be upgraded to hard-sided canvas-top cabins. Housing would be provided for employees at Wawona only if not available outside park boundaries.

Commercial services for both visitors and employees would be authorized at El Portal as specified in the GMP, subject to future planning efforts to further define needed services.

Support Operations for the Primary Concessioner

As many of the primary concessioner's support operations as possible would be located outside Yosemite Valley. The concessioner's group services office, now in the bank building, would be moved to the new headquarters building, as would the data processing center now housed in the warehouse building. The existing concessioner's headquarters building would be removed as proposed in the 1980 GMP.

The GMP calls for essential concessioner maintenance functions to be located in the existing NPS maintenance area and indicates the warehouse building adjacent to the maintenance area is to be removed. That building now houses the warehouse/distribution center, maintenance shops, a recycling processing center, and a data processing center.

Rather than being removed and replaced by a new building in essentially the same area, the existing building would continue to be used as a district operational support center. The warehousing function would be reduced; emphasis would be placed on local distribution. The primary concessioner's maintenance shops and the recycling processing center would remain in the building, which also would house the concessioner security office (existing security office buildings at Yosemite Village would be removed), the employee uniform center (now in the general store building), and local (district) employee payroll, personnel, and housing offices essential for efficient service to the staff housed in Yosemite Valley.

The existing Yosemite Village company fire station would be replaced by a new facility. The village garage/vehicle repair building would be removed. Bus parking, fueling, cleaning, and washing would be relocated to a transportation staging area to be determined in future valley planning. Major vehicle maintenance and bus repair facilities would be at El Portal. The reservation services office (now in Fresno) would continue to be located outside the park. Some warehousing takes place in Fresno; primary warehousing would continue to be located outside the park.

Access for Visitors With Disabilities

Sensitive park design would be employed to allow visitors with disabilities to enjoy park concessions and participate in concession recreational activities, using the same facilities and programs as the able-bodied.

Similar access consideration would be given to support facilities such as the medical facility and to employee work areas and housing. The degree of accessibility would be proportional to the degree of development. As required by the Americans with Disabilities Act and National Park Service policies, new visitor facilities and new work areas and housing for employees would be designed and constructed to be accessible, and existing facilities would be rehabilitated to make them accessible.

Concession facilities in backcountry areas, which typically have little development, would be made accessible only to the extent feasible without major modification of the site. Thus, trails to and within backcountry areas would remain basically unimproved; there would be no change in existing topographic variations. Where possible, accessibility features would be

developed in consultation with local organizations whose members are disabled.

Project Priorities and Cost Estimates

Priorities. High priorities exist for implementation of several concession actions such as relocation of the primary concessioner's headquarters and some employee housing to a site outside Yosemite Valley, removal of the Yosemite Village garage and repair facility, and remodeling of food facilities.

Implementation of project priorities is subject to approved planning and compliance, additional planning and design efforts, evaluations of facility condition, interrelationships of projects and funding sources, funding availability, ease of accomplishment, and other factors that may develop over the implementation period. The implementation timetable on the next page includes several of the major concession projects in five-year increments. It is subject to the above considerations, which could alter schedules, change priorities, or delay the implementation of some actions.

Employee housing and service facilities also would be developed during the 15-year period, as provided for in the *Yosemite Valley Housing Plan*. Initial emphasis would be on addressing safety concerns and on replacement of employee tent-cabins and other substandard housing.

Cost Estimates. Concessioner facility costs connected with implementing the primary concessioner's portion of this plan are estimated in current dollars at roughly \$27,400,000 for construction and repair in alternative A (GMP) and \$28,600,000 for alternative B (final proposal). These estimates include the costs of planning, design, and construction supervision. They do not include Yosemite Valley employee housing and facilities costs, which will be

Implementation Timetable

First Five Years

- Life safety and other necessary repairs, rehabilitation, and replacement.
- Move garage/vehicle repair to El Portal
- Move concessioner headquarters out of the Valley
- Relocate Glacier Point facility
- Remodel Degnan's and Curry Village food service
- Other Yosemite Valley food service remodeling
- Other building remodeling (merchandising, lodging, visitor services, support buildings, etc.)
- Provide showers in campgrounds
- Build new concessioner warehouse out of valley
- Begin valley lodging development
- Further planning and design work for next phase

Second Five Years

- Relocate valley stables
- Redesign Tuolumne Meadows facilities and construct new White Wolf Restaurant
- Redesign Wawona circulation and parking, rehabilitate facilities, construct new restaurant
- Continue remodeling of building as listed above
- Continue valley lodging development
- Further design work for next phase

Third Five Years

- Redesign Housekeeping Camp
- Continue valley lodging development
- Other action items in the *Concession Services Plan*

included in the draft housing plan. In addition, as yet unknown costs of major repairs to existing structures will be added to these estimates.

Costs for actions included in the *Concession Services Plan* (not including employee housing) are summarized by area. The estimates include new construction, remodeling, demolition, and known repair/rehabilitation estimates.

In both alternative A and alternative B, it is recognized that some facilities will be rehabilitated or replaced as they become worn out or obsolete. Many, but not all, of the new facilities that will be provided will replace existing facilities that have used up most, if not all, of their economic lives.

The "Development" estimates listed in table 1 (page 18) include costs for construction of new facilities, removal of facilities, and remodeling of existing facilities. The "Repair" column lists costs of repairing or correcting building deficiencies such as structural, electrical, plumbing, roofing, and other needs. The repair estimates are based on a building condition assessment being conducted by a private contractor. This assessment is not yet completed; therefore, some rehabilitation costs are not yet available.

Project Funding. Project funding for concession facilities generally would not come from funds appropriated by Congress. Implementation of the concession aspects of the GMP is intended to be carried out from funds provided through concession contract provisions, such as funds set

ALTERNATIVES

TABLE 1: COST ESTIMATES FOR DEVELOPMENT AND REPAIR BY ALTERNATIVE

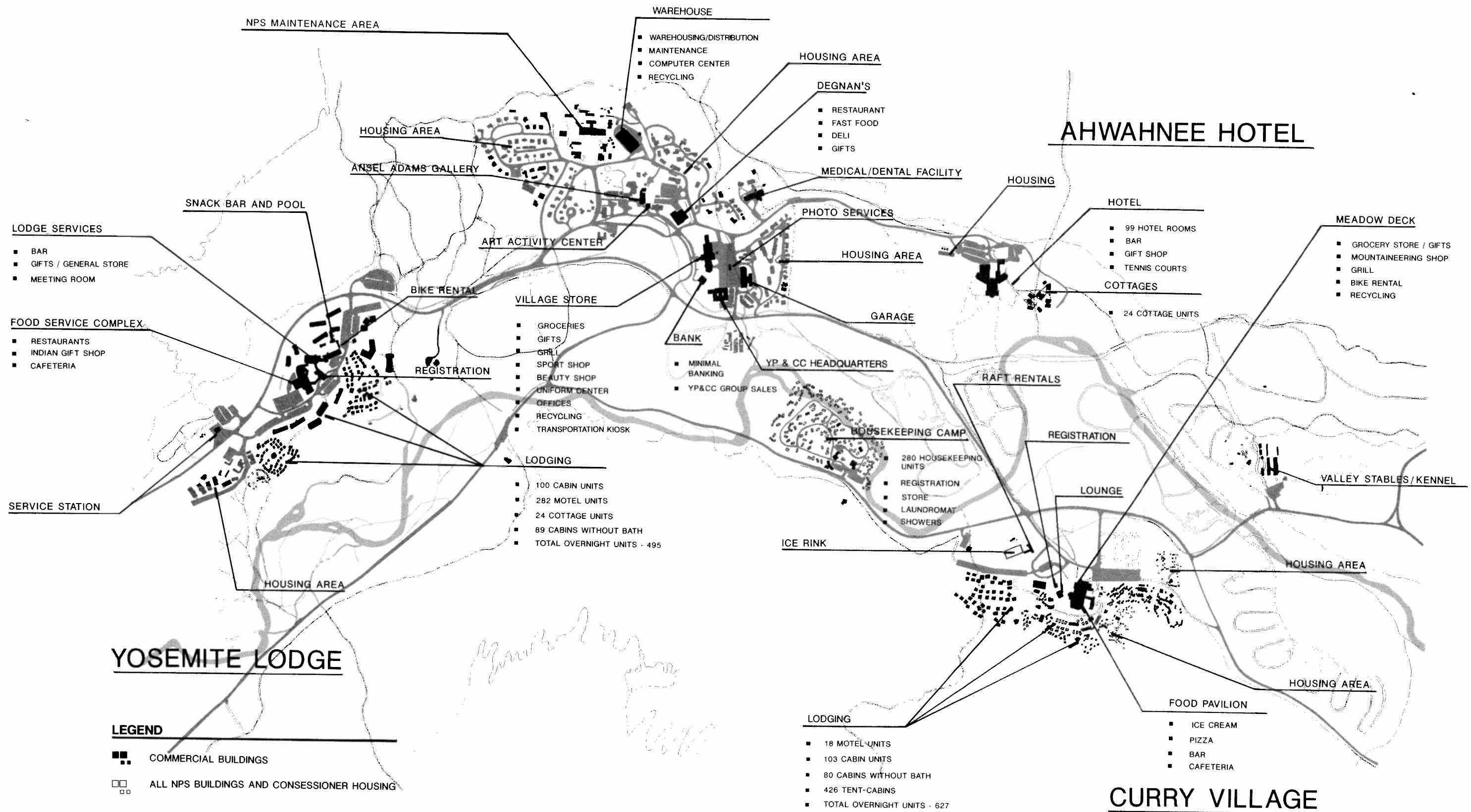
Area of Construction, Repair, or Removal	Alternative A (Implement GMP)		Alternative B (Final Proposal)	
	Development	Repair	Development	Repair
<i>Yosemite Valley</i>				
Ahwahnee Hotel and Cottages	\$ 42,000	\$ 50,000	\$ 12,000	\$ 50,000
Yosemite Village	3,455,000 ¹	97,000	640,000	208,000
Yosemite Lodge	241,000	1,126,000	4,862,000	372,000
Curry Village	605,000	1,890,000	5,095,000	1,563,000
Housekeeping Camp	1,378,000	68,000	1,378,000	68,000
Valley Stables	—	²	499,000	—
Valley Campgrounds	—	—	178,000	—
Total costs, Yosemite Valley	\$ 5,721,000	\$3,231,000	\$12,664,000	\$2,261,000
<i>Outside Yosemite Valley</i>				
Glacier Point	\$ 200,000	—	\$ 143,000	—
Badger Pass Ski Area	—	283,000	—	283,000
Wawona	1,434,000 ³	²	683,000	²
Mariposa Grove	2,000	—	2,000	—
El Portal/Foresta	13,009,000 ⁴	—	10,395,000	—
Crane Flat	8,000	6,000	8,000	6,000
White Wolf	2,395,000 ⁵	²	860,000	²
Tuolumne Meadows	1,069,000	²	1,325,000	²
Total costs, outside Yosemite Valley	\$18,117,000	\$ 289,000	\$13,416,000	\$ 289,000
PARK TOTAL	\$23,838,000	\$3,520,000	\$26,080,000	\$2,550,000
ALTERNATIVE TOTAL	\$27,358,000		\$28,630,000	
<div>1. Includes new maintenance building.</div> <div>2. Estimate not yet available.</div> <div>3. Includes additional hotel rooms.</div> <div>4. Includes new warehouse, company offices, and bus facility.</div> <div>5. Includes employee dormitory.</div>				

aside or invested by the new concessioner in a capital improvement fund. This set-aside fund would be based on a percentage of the concessioner's gross receipts to be determined during the concession contracting process.

The initial contract term will be 15 years. During that time, the new concessioner

would liquidate the debt resulting from the purchase of the Yosemite Park and Curry Company from MCA. Since the purchase debt would be fully paid at the end of the initial 15-year contract, the operation would have an enhanced ability to fund capital improvements for other GMP concession-related purposes after the initial 15 years.

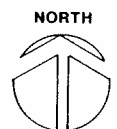
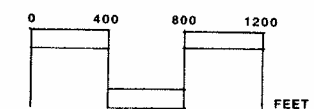
YOSEMITE VILLAGE



EXISTING CONDITIONS

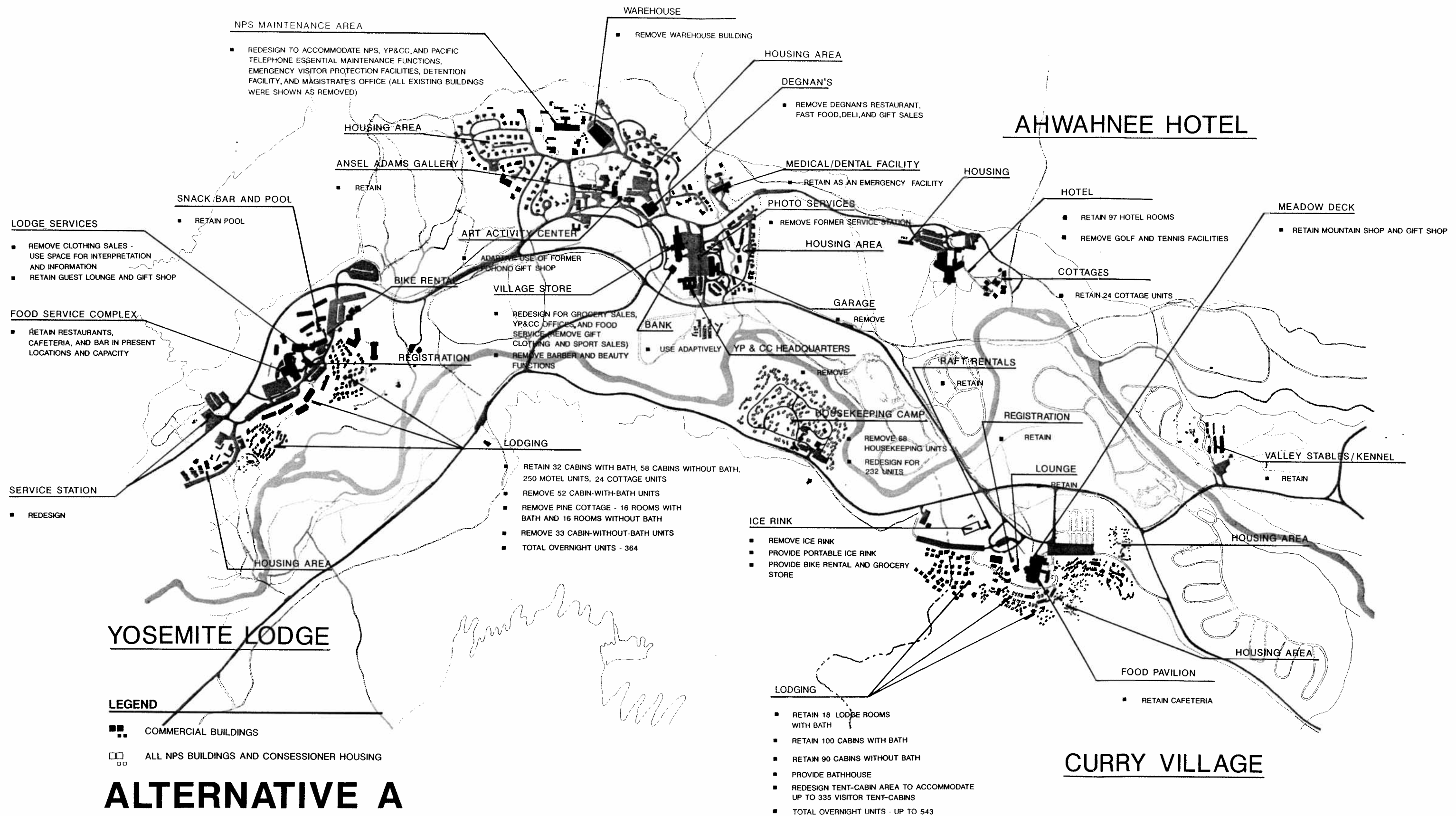
CONCESSION SERVICES PLAN

YOSEMITE NATIONAL PARK U.S. DEPARTMENT OF THE INTERIOR NATIONAL PARK SERVICE

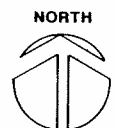
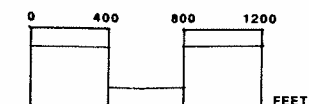


104 | 20,104
DSC | June 1992

YOSEMITE VILLAGE



ALTERNATIVE A 1980 GMP PROPOSALS CONCESSION SERVICES PLAN

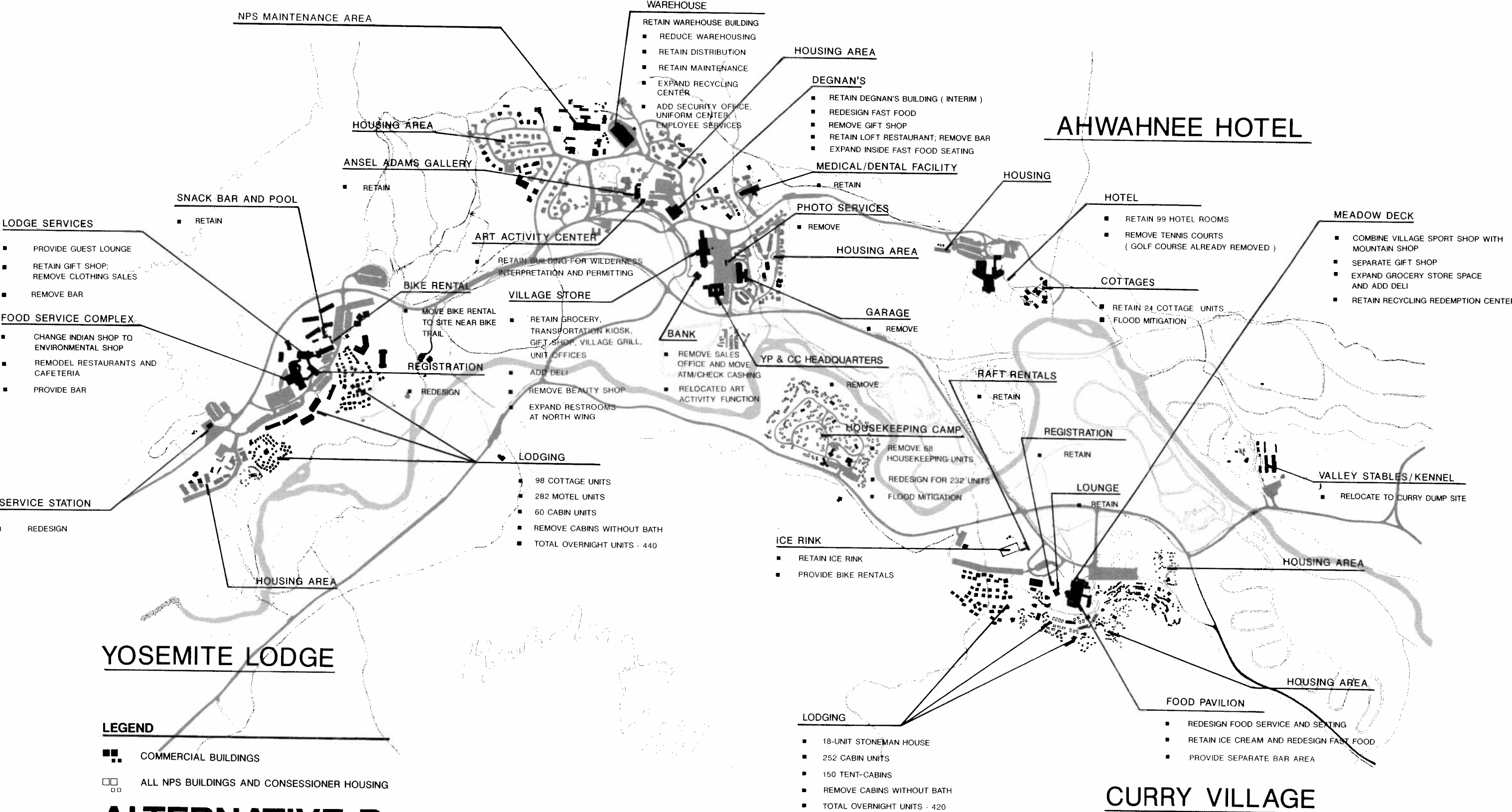


YOSEMITE VILLAGE

AHWAHNEE HOTEL

YOSEMITE LODGE

CURRY VILLAGE



ALTERNATIVE B
FINAL PROPOSED ACTION
CONCESSION SERVICES PLAN

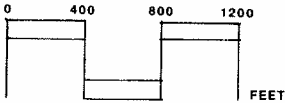


TABLE 2: COMPARISON OF EXISTING CONDITIONS AND ALTERNATIVES

Facility/Service/Activity	Existing Situation (for comparison only)	Alternative A: Implement GMP Concession Actions	Alternative B: Implement GMP Concession Actions With Revisions (Final Proposed Action)
<u>Yosemite Valley</u>			<i>Valley implementation plan to be prepared</i>
Transportation system/ valley shuttle	Year-round shuttle bus system	Improve operation; expand service	Consistent with GMP
<u>Ahwahnee Hotel</u>			
Lodging: Hotel rooms	99	97	99
Cottage rooms	24	24	24
Total	123	121	123
	(conversion of a bar into 2 rooms since 1980 increased total by 2.)		(subject to minor design-related adjustments)
Food service	Dining room with 360 seats inside, 65 outside	Retain present dining room	Consistent with GMP
Bar	Ahwahnee Indian Room	Retain Ahwahnee Indian Room	Consistent with GMP
Sweet Shop	Sundries and gift sales	Retain Sweet Shop as fountain	Provide sundries and reading materials; remove gifts
Gift Shop	Gift sales	Retain gift sales	Consistent with GMP
Golf course	Golf course has been removed	Remove golf course	Consistent with GMP (removed)
Tennis courts	Available	Remove tennis court	Consistent with GMP
Hotel services	Typical deluxe hotel services: doorman, bell service, room service, concierge, etc.	Retain traditional level of services	Consistent with GMP
<u>Yosemite Village</u>			
Degnan's building	Loft restaurant, fast food, deli: 174 seats inside; gift shop	Remove building (and functions)	Retain building on an interim basis; remove gift shop; retain Loft restaurant and fast food; increase inside seats to approximately 290
Village Store	Grocery store, gifts, offices; recycling redemption center and transportation kiosk outside; Village Grill (16 seats inside, 270 outside), sport shop, beauty shop, employee uniform center, restrooms	Redesign for grocery sales, YP&CC offices, food service (remove gift, clothing, sport shop, beauty shop)	Grocery, deli, photo service (close 4-hour developing), recycling redemption center, transportation kiosk; gift shop and Village Grill (20 inside seats); remove beauty shop, uniform center; enlarge restrooms

Facility/Service/Activity	Existing Situation (for comparison only)	Alternative A: Implement GMP Concession Actions	Alternative B: Implement GMP Concession Actions With Revisions (Final Proposed Action)
<u>Yosemite Village</u> (continued)			
Picnic seating	420 seats	105 seats	320 seats
Valley Garage	Bus and auto repair services	Remove Valley Garage	Consistent with GMP (remove from valley)
Service station	Closed; used for video rentals for residents, photo center	Remove service station building	Consistent with GMP (photo center to general store; video rental to employee center)
Bank	ATM/check cashing; primary concessioner sales office	Use adaptively, including minimal banking services	Remove sales office; move ATM/check cashing to another location; adapt use for art activity center
Pohono Gift Shop	Has been converted to art activity center	Use adaptively	Consistent with GMP (convert to wilderness permitting/interpretation)
Yosemite Park & Curry Co. headquarters	YP&CC (primary concessioner) headquarters	Remove building, move function to El Portal	Consistent with GMP (location of primary concessioner headquarters to be determined)
Maintenance/support services	Maintenance, warehousing, data processing, recycling in warehouse facility at Valley maintenance area	Redesign NPS maintenance area to include YP&CC essential maintenance functions; remove YP&CC warehouse	Retain warehouse building as operations support center, including distribution center, maintenance shops, security office, recycling processing, employee uniforms, district personnel/payroll/housing office; ADP to new headquarters out of Yosemite Valley
Concessioner fire station	Near general store	Not mentioned	Remove existing building; construct new fire station
Ansel Adams Gallery	Photo and gift sales	Retain	Consistent with GMP
Medical/dental center	Year-round service	Retain as emergency medical center	Retain as emergency medical center and for local care
<u>Yosemite Lodge</u>			
Lodging: Motel rooms	266	250	266
Cottage rooms	24	24	98
Cabin rooms	100	32	60
Motel, no bath	16	0	16
Cabin, no bath	89	58	0
Total	495	364	440
Subject to minor design-related adjustments. Registration area to be redesigned.			

Facility/Service/Activity	Existing Situation (for comparison only)	Alternative A: Implement GMP Concession Actions	Alternative B: Implement GMP Concession Actions With Revisions (Final Proposed Action)
<u>Yosemite Lodge (continued)</u>			
Guest lounge	Cliff Room: meetings, special functions (portion of space now Mountain Room bar)	Retain as a guest lounge	Consistent with GMP
Food service	Cafeteria, Mountain Room, Four Seasons restaurants: 570 seats inside, 106 outside	Retain, with total of 632 seats	Retain with approximately 640 seats inside, 40 outside; remodel within existing service area.
Bar	Mountain Room bar	Retain at former location (now used as part of Mountain Room Broiler)	Design smaller bar elsewhere in restaurant complex
Store	Store: gifts, clothing	Retain gift shop; remove clothing, use space for information, interpretation.	Consistent with GMP
Indian Gift Shop	Indian gift shop	Added after GMP, in location of former snack bar	Change to an environmental shop
Bike stand	Located next to pool	Not mentioned	Move to site near bike trail
Service station	27 mini-service pumps	Redesign at existing levels	Consistent with GMP (pumps being changed to self service)
<u>Housekeeping Camp</u>			
Lodging: Tent-cabins	280 units	Reduce from 300 to 232 units, redesign area	Consistent with GMP (20 units were re-moved in 1990)
Merchandise	Small camp store	Retain camp store	Consistent with GMP
Showers/laundry	Shower/coin-operated laundry building	Retain laundry and showers	Consistent with GMP
<u>Curry Village</u>			
Lodging: Stoneman House	18	18	18
Cabin rooms	103	100	252
Cabins, no bath	80	90	0
Tent-cabins	426	335 maximum	150
Total	627	543	420
Subject to minor design-related adjustments			

Facility/Service/Activity	Existing Situation (for comparison only)	Alternative A: Implement GMP Concession Actions	Alternative B: Implement GMP Concession Actions With Revisions (Final Proposed Action)
<u>Curry Village (continued)</u>			
Food service	Cafeteria, fast food, ice cream, pizza: 390 seats inside	Retain cafeteria for total of 325 inside seats (fast food not mentioned; pizza and ice cream stand added after GMP)	Redesign food service and fast-food units: approximately 370 seats inside
Picnic seats	255 seats	70 seats	270 seats
Bar	Curry Village Terrace	Not mentioned	Relocate away from picnic seating
Merchandise	Camp store/gift shop, mountain/sport shop	Build grocery store at ice rink; retain gift, mountain shops	Redesign Meadow Deck building for combined mountaineering center and sports shop, enlarge grocery store; add deli, separate gift shop
Ice Rink	Ice rink operation	Remove permanent ice rink, provide portable ice rink in winter	Retain and redesign ice rink
Bike and ski rental	Bike and crosscountry ski rental at Meadow Deck building	Provide bike rental at ice rink site	Consistent with GMP: redesign Meadow Deck building with space allocated for cross-country ski rental
Tour and information centers	Near registration building	Not mentioned	Retain in Curry Village area
Raft rental	At ice rink	Added after GMP	Retain near ice rink site
Happy Isles snack bar	Seasonal operation	Not mentioned	Retain
<u>Valley Stables</u>			
Horseback rides	Stables near two rivers. Various rides in Yosemite Valley, to valley rim areas and overnight; pony rides	Retain	Retain service; move stables from river bottom to old Curry dump site; limit valley routes; require interpretation; discontinue pony rides
Kennel	Located at stables	Not mentioned	Retain at stables
<u>Valley Campgrounds</u>			
Showers	No showers at 7 campgrounds with total of 817 sites	Showers not mentioned	Add concessioner-operated showers at major campgrounds
<u>Glacier Point</u>			
Food Service	Snack bar building	Move facility to parking area	Consistent with GMP

Facility/Service/Activity	Existing Situation (for comparison only)	Alternative A: Implement GMP Concession Actions	Alternative B: Implement GMP Concession Actions With Revisions (Final Proposed Action)
<u>Glacier Point (continued)</u>			
Merchandise	Gift shop and store	Move facility to parking area; offer items directly related to an interpretive experience at Glacier Point	Discontinue gift shop operation; provide film, sundries, and picnic supplies at snack bar building in parking area
<u>Badger Pass</u>			
Downhill skiing	Lifts and ski school	Retain existing facilities; enforce safe slope capacity	Consistent with GMP; continue to evaluate
Crosscountry skiing	Crosscountry ski trailhead	Retain existing facilities	Consistent with GMP
Food service	Fast food, snack bar: 200 seats inside, 200 outside	Retain	Consistent with GMP
Merchandise	Available	Retain	Consistent with GMP
Gifts, clothing	Available (added since GMP)	Provide	Retain
Ski rentals and sales	Rentals available	Provide storage and repair	Consistent with GMP
Snowshoes	Winter bus service from Yosemite Valley and Wawona	Continue	Consistent with GMP
Transportation	Available	Not mentioned	Retain
Child Care			
<u>Wawona</u>			
Lodging: Hotel rooms	22	20	22
Hotel, no bath	46	19	46
Cottage rooms	28	26	28
Cottage, no bath	8	7	8
To be added		73	
Total	104	145	104
			(subject to minor design-related adjustments)
Food service	Hotel dining room and golf shop snack bar: 110 seats inside, 50 outside	Retain dining room	Retain hotel dining room, golf shop snack bar; add small restaurant outside hotel complex: approximately 170 seats inside, 50 outside
Bar	Dining room bar service	Not mentioned	Retain
Merchandise	Store, gift shop	Redesign store and gift shop to historic scene	Consistent with GMP

Development concept plan to be prepared

Facility/Service/Activity	Existing Situation (for comparison only)	Alternative A: Implement GMP Concession Actions	Alternative B: Implement GMP Concession Actions With Revisions (Final Proposed Action)
<u>Wawona</u> (continued)			
Service station	3 self-service, 3 mini-pumps; towing service	Redesign to historic scene	Redesign, add minor repairs
Activities:			
Golf course, pro shop	Available	Retain	Consistent with GMP
Tennis court	Available	Retain	Consistent with GMP
Swimming pool	Available	Retain	Consistent with GMP
Stables	Available	Retain	Consistent with GMP
Transportation	Bus service to Yosemite Valley; winter bus service to Badger Pass; summer bus service to Mariposa Grove	Provide year-round bus service to Yosemite Valley, winter bus service to Badger Pass	Consistent with GMP: addition of summer bus service to Mariposa Grove
Employee Housing	Minimal amount of housing	Provide housing only if not available outside park boundary	Consistent with GMP
<u>South Entrance</u>			
Lodging Information/Reservations	Not available	Add information/orientation/reservation system	Consistent with GMP
<u>Mariposa Grove</u>			
Merchandise	Gift shop	Remove gift shop function	Consistent with GMP
Transportation	Tram system through Mariposa Grove	Extend tram to new South Entrance parking area	Continue existing tram until development concept plan completed
<u>El Portal</u>			
Visitor Services	Service station; grocery store	Provide a commercial facilities area: auto service, restaurants, grocery store, clothing and gift shops, bank, beauty and barber shops	Continue service station and grocery store; consider other services in development concept plan
Lodging information/reservations	Not available	Add information/orientation/reservation system	Consistent with GMP
Administration	Now located at Yosemite Village	Relocate from valley to El Portal	Consistent with GMP (location to be considered in Yosemite Valley housing plan)

Facility/Service/Activity	Existing Situation (for comparison only)	Alternative A: Implement GMP Concession Actions	Alternative B: Implement GMP Concession Actions With Revisions (Final Proposed Action)
<u>El Portal</u> (continued)			
Support facilities	Now located at Yosemite Village and in maintenance area	Construct areas at El Portal for maintenance, warehousing, bus servicing, laundry, open-air storage	Support facilities to be considered in development concept plan
<u>Hodgdon Meadows</u>			
Lodging information/reservations	Not available	Add information/orientation/reservation system	Consistent with GMP
<u>Crane Flat</u>			
Merchandise	Camp store and gifts	Renovate for year-round use	Consistent with GMP
Service station	8 mini-pumps	Keep station open all year	Consistent with GMP
Winter use area	Not available	Offer crosscountry ski and snow play equipment rental	Consistent with GMP
Parking	Limited parking in winter at service station and other locations nearby	Provide parking for 200 vehicles	Use existing parking areas, some of which may be expanded or relocated
<u>White Wolf</u>			
Lodging: Cabin rooms	4		<i>Development concept plan to be prepared</i>
Tent-cabins	24	4	Retain 4 cabins and 24 tent-cabins
Total	28	<u>21</u> 25	
Food service	Dining room with 30 seats inside, 20 outside	Retain dining room	Replace dining room with new facility with 50 seats inside
Existing lodge	Used for room registration, dining, closet-sized camp store	Retain with existing functions	Convert lodge to registration facility, visitor lounge, small camp store
Stables	Located near tent-cabins	Relocate	Discontinue activity
Employee housing	Tent-cabins	Replace with dormitory	Replace with hard-sided, canvas-top cabins
<u>Tuolumne Meadows</u>			
Lodging	69 tent-cabins	66 tent-cabins	<i>Development concept plan to be prepared</i> Retain 69 tent-cabins
Food service	Lodge dining room, Tioga Road fast food—total of 104 seats inside, 24 outside	Retain lodge dining room; relocate fast food to service station building	Relocate dining room away from river; move fast food to new store building with 50 in-door seats, for total of about 160 inside seats

Facility/Service/Activity	Existing Situation (for comparison only)	Alternative A: Implement GMP Concession Actions	Alternative B: Implement GMP Concession Actions With Revisions (Final Proposed Action)
<u><i>Tuolumne Meadows</i></u> (continued)			
Merchandise	Store, mountaineering center and shop	Relocate store and mountaineering center and shop to service station	Relocate store and mountaineering center and shop to new store building
Lodging information/reservations	Not available	Not mentioned	To be considered
Stables	Located near Tioga Road	Relocate to pine ecosystem	Consistent with GMP
Employee housing	Primarily near lodge	Upgrade existing housing	Relocate away from river's edge; upgrade
<u><i>High Sierra Camps</i></u>			
Lodging	56 tent-cabins at 5 locations	Retain	Consistent with GMP
<u><i>Parkwide</i></u>			
Lodging			
Total units, parkwide	1,782	1,552 (- 10.5% from 1980)	1,472 (- 15.2% from 1980)
Total units, Yosemite Valley	1,525	1,260 (- 17.5% from 1980)	1,215 (- 20.5% from 1980)
			Figures subject to minor design-related adjustments
Food service			
Total seats, parkwide	2,725	1,910	2,830
Total seats, Yosemite Valley	2,385	1,620	2,400
			Figures subject to minor design-related adjustments
Gifts/souvenirs	No park-specific guidelines on gift and souvenir sales	See Glacier Point for only specific mention	Gift and souvenir items to have relationship to Yosemite, its environs and history, or other related environmental topics
Conventions/group meetings	Seasonal limitations on number of meetings	Large meetings allowed subject to park guidelines	Consistent with GMP; blackout period for conventions extended; support functions and services for other special events eliminated or reduced

Facility/Service/Activity <u>Parkwide</u> (continued)	Existing Situation (for comparison only)	Alternative A: Implement GMP Concession Actions	Alternative B: Implement GMP Concession Actions With Revisions (Final Proposed Action)
Alcoholic beverages—package sales outlets			
Yosemite Valley	6	5	4
Other areas (1 outlet each)	$\frac{6}{12}$	$\frac{5}{10}$	$\frac{5}{9}$
Total			
Bars and food service			
	Alcoholic beverages also available with food service, at lodging bars, and at one restaurant bar	GMP mentions only two bars; says nothing about service of alcohol with meals	Service continued at lodging bars and with meals at restaurants, cafeteria, and selected major fast-food outlets; Loft restaurant bar to be closed

TABLE 3: PARKWIDE LODGING AND FOOD SERVICE COMPARISON SUMMARY

	1980	Existing Situation	GMP (Alternative A)	Final Proposal (Alternative B)
<u>Lodging</u> (rooms)				
Deluxe	121	123	121	123
Midscale	252	256	325	374
Economy	290	309	222	374
Total with bath	663	688	668	871
Total without bath	<u>1,072</u>	<u>1,094</u>	<u>884</u>	<u>601</u>
Park total	1,735	1,782	1,552	1,472
<u>Area Summary</u>				
Ahwahnee	121	123	121	123
Yosemite Lodge	481	495	364	440
Curry Village	626	627	543	420
Housekeeping Camp	300	280	232	232
Wawona	72	104	145	104
White Wolf	13	28	25	28
Tuolumne Meadows	66	69	66	69
High Sierra camps	56	56	56	56
<u>Food Service</u> (seats)^a				
Restaurant	1,070	1,225	945	1,300
Cafeteria	690	705	690	310
Combined ^b	—	—	—	370
Fast Food	130	120	100	260
Picnic ^c	<u>275</u>	<u>675</u>	<u>175</u>	<u>590</u>
Total seats	2,165	2,725	1,910	2,830
<u>Area Summary</u>				
Ahwahnee	435	425	435	430
Yosemite Village	375	610	120	630
Yosemite Lodge	630	680	630	680
Curry Village	395	645	395	640
Happy Isles	40	25	40	20
Wawona	150	160	150	220
White Wolf	50	50	50	50
Tuolumne Meadows	90	130	90	160
<p>a. Does not include Badger Pass winter food operation (400 seats) or High Sierra camps.</p> <p>b. Inside seating design at the Curry Village food pavilion will be determined following a food service study. Seating design will be flexible to allow for use by fast-food customers.</p> <p>c. Multi-use outdoor seating at Yosemite Village and Curry Village for persons with picnic lunches, deli purchases, fast-food purchases, and the like.</p>				

AFFECTED ENVIRONMENT

INTRODUCTION

Yosemite National Park encompasses 747,892 acres of lands in Tuolumne, Mariposa, and Madera counties, California. A total of 706,348 acres, or 94% of the park, is designated wilderness. Yosemite Valley, at approximately 2,000 acres, comprises 0.3% of the park. The park is in the heart of the Sierra Nevada range, christened the "range of light" by naturalist John Muir. The park encompasses a cross-section of the habitats and biota characteristic of the Sierra Nevada.

California's burgeoning population now totals 29,760,000, having grown at a rate of approximately 8% during the past decade. Californians account for more than 60% of the visitors arriving in the park by automobile. The urban population is concentrated in the metropolitan areas of San Francisco, Los Angeles, and San Diego, with a secondary concentration along the San Joaquin Valley west of the Sierra. The park's proximity to major urban areas, about four to six hours' driving time, results in heavy weekend use and creates special problems not present in more remote national parks.

The major purposes of the park are to conserve its array of natural and cultural resources and to ensure that visitors have appropriate opportunities for education, enjoyment, and recreation.

Because the focus of this plan is concession services, the affected environment is considered to be the general areas where concessions have been operating or areas that could be most directly affected by concession operations. The environment analyzed here is primarily developed areas along the major roads: Yosemite Valley, Wawona, Mariposa Grove, Crane

Flat, White Wolf, Tuolumne Meadows, Glacier Point, Badger Pass, and El Portal; however, the High Sierra camps also must be included in the affected environment for this document. Some aspects of the natural environment such as wildlife are not described in detail in this document because they would not be significantly affected by any actions of the alternatives discussed in this plan. The 1980 GMP contains a general description of the overall environment in Yosemite National Park.

VISITOR USE AND CONCESSION FACILITIES AND SERVICES

Visitation

Visitation to Yosemite increased by 33% between 1980 and 1989. In 1989, visitation totaled 3,308,159. However, the greatest increases in both day users and overnight stays have been in nonsummer seasons. Day use has risen most dramatically (see table 4). Visitation figures for 1990 have not been used in this document because severe fires forced closure of the park during the main visitor season, drastically affecting visitation.

Concessioners

Commercial visitor services and facilities in the park and at the El Portal administrative site are authorized under concession contracts. The following companies provide services:

Best's Studio: Ansel Adams Gallery at Yosemite Village

El Portal Chevron service station: fuel and repairs at El Portal administrative site

TABLE 4: VISITOR STATISTICS—YOSEMITE NATIONAL PARK

Visitation Summaries and Trends											
	1980	1981	1982	1983	1984	1985	1986	1987	1988	1989	1990
Park visitation	2,490,282	2,516,893	2,415,587	2,457,464	2,738,467	2,939,436	2,876,717	3,152,275	3,216,681	3,308,159	3,124,939
Change from 1980 (%)	—	+ 1.1	- 3.0	- 1.3	+ 10.0	+ 18.0	+ 15.5	+ 26.6	+ 29.8	+ 32.8	+ 25.5
Total overnight stays	2,034,638	2,127,274	2,037,275	1,916,666	2,210,915	2,068,339	1,883,601	2,199,080	2,285,778	2,219,735	2,220,420
Change from 1980 (%)	—	+ 4.6	+ 0.1	- 5.8	+ 8.7	+ 1.7	- 7.4	+ 8.1	+ 12.3	+ 9.1	+ 9.1
Lodging overnight stays	890,048	909,233	907,453	910,503	944,052	962,921	981,527	995,654	1,028,113	1,048,640	1,029,846
Change from 1980 (%)	—	+ 2.2	+ 2.0	+ 2.3	+ 6.1	+ 8.2	+ 10.3	+ 11.9	+ 15.5	+ 17.8	+ 15.7
Lodging Stays By Month—Comparison Between 1980 and 1989											
Month	1980	1989	Change	Percent- age of Change	1980 ^a	1989 ^a	Change	Percent- age of Change			
January	66,677	102,646	35,969	54	33,683	45,590	11,907	35			
February	75,612	96,527	20,915	28	41,053	48,827	7,774	19			
March	99,896	143,858	43,962	44	47,649 ^a	57,619	9,970	21			
April	120,970	204,102	83,132	69	58,546	74,840 ^a	16,294	28			
May	212,971	377,940	164,969	77	88,021	108,331	20,310	23			
June	309,470	413,068	103,598	33	117,373	134,815	17,422	15			
July	416,583	511,957	95,374	23	140,194 ^a	157,842	17,648	16			
August	470,491	524,395	53,904	11	141,107	157,789	16,682	12			
September	289,108	390,364	101,256	35	90,584	100,551	9,967	11			
October	238,586	264,670	26,084	11	66,762	72,400	5,638	8			
November	118,024	163,939	45,915	39	43,530	51,670	8,140	19			
December	71,894	114,693	42,799	60	31,623	47,256	15,633	49			
Annual Total	2,490,282	3,308,159	817,877	33	900,125 ^a	1,057,530 ^a	157,405	18			

a. To avoid comparisons with months in which visitation was abnormal because of weather, fire, or other factors, the following more typical months were selected to represent the adjacent years: March 1981, April 1988, July 1981. Annual totals will thus be slightly different from those shown in the trend summary above.

a. To avoid comparisons with months in which visitation was abnormal because of weather, fire, or other factors, the following more typical months were selected to represent the adjacent years: March 1981, April 1988, July 1981. Annual totals will thus be slightly different from those shown in the trend summary above.

TABLE 4: VISITOR STATISTICS (continued)

Month	Ahwahnee	Yosemite Lodge	Occupancy Rates, 1989 (percentage)				Wawona	Tuolumne	White Wolf
			Curry Village ^b	Housekeeping Camp					
January	88	84	14	—			—	—	—
February	77	89	20	—			—	—	—
March	86	97	24	—			—	—	—
April	95	100	56	—		79	—	—	—
May	98	100	86	59		100	—	—	—
June	100	100	96	88		99	86	95	95
July	100	100	97	98		99	100	97	97
August	100	100	99	99		100	100	99	99
September	99	100	82	53		98	98	100	100
October	99	100	57	30		87	—	—	—
November	96	96	31	—		95 ^c	—	—	—
December	88	73	14	—		77 ^c	—	—	—
Average	94	95	56 (7-month avg. 82)	71		93	96	98	98

b. All units, including tent-cabins, are available throughout the year; occupancy rates are based on this.

c. The Wawona Hotel was open on weekends and Thanksgiving during November; in December it was open from the 15th through the 31st; occupancy computed for days hotel was open.

El Portal Market: grocery and general merchandise at El Portal administrative site

Yosemite Medical Center: medical facility services at Yosemite Village

Yosemite Park and Curry Company: lodging, food service, merchandise, transportation, visitor activities, and other services throughout the park

Concession Facilities and Services

Yosemite Valley. Most visitor activities take place in the developed eastern end of Yosemite Valley. The eastern end of the valley is the location of all the visitor accommodations and campgrounds and of major facilities and services provided by the National Park Service and concessioners. Major facilities are Yosemite Village, Yosemite Lodge, the Ahwahnee Hotel, Curry Village and Housekeeping Camp, and seven NPS campgrounds. The shuttle bus circulates through the eastern part of the valley, making 19 designated stops during summer hours of operation, which are from 7:30 a.m. to 10:00 p.m. In the off-season, the bus operates from 10:00 a.m. to 9:00 p.m., making fewer stops.

Yosemite Village, which covers about 90 acres, is the core area for most of the development and day use in Yosemite Valley. In the west end of the village are the NPS visitor center, museum, administration building, and maintenance area and the primary concessioner's warehouse. The middle section of the village contains the Ansel Adams Gallery, the Art Activity Center, a post office, Degnan's, the Village Store complex, the bank (offering check cashing and an automated teller machine), and the primary concessioner's sales office and headquarters building. Behind (east of) this complex are a former service station that is now used as a photo

center and employee video rental shop, the Valley Garage, and the medical facility. The village area also includes employee housing facilities.

Yosemite Lodge, 1 mile west of the village, covers about 45 acres. It contains motel units and cabins totaling 495 rooms. In addition, there is a main lodge and registration center, two restaurants and a cafeteria with 570 inside and 106 outside seats, a bar, a gift and merchandise shop, an Indian gift shop, bike rental, a postal station, and employee housing. Northwest of the complex is a service station.

The Ahwahnee Hotel area occupies 12 acres about ½ mile east of Yosemite Village. It offers 123 rooms in a multistory hotel and nine cottages. Visitor services include a dining room with 425 seats inside and outside, a sweet shop, a gift shop, and a bar. Adjacent to the hotel are two tennis courts, an employee dormitory, and four employee tents.

Curry Village, 1 mile southeast of Yosemite Village, occupies about 50 acres. It offers overnight accommodations in the form of cabins, tent-cabins, and 18 lodge units in the Stoneman House, for a total of 627 units. Food service is offered in the cafeteria and fast food outlets for pizza, hamburgers, and ice cream. There are 390 inside and 255 outside seats. Other facilities include a camping supplies store/gift shop, a mountain sport shop, bike rental, an information building and reservation center, and employee housing. The ice rink operates in the winter, with raft rentals and a camp store available in the rink area during summer. The Happy Isles snack bar, which is east of Curry Village, operates seasonally.

Housekeeping Camp, which occupies about 20 acres, offers 280 tent-cabin units with a small camp store and a building with showers and laundry facilities.

The Valley Stables occupy 7 acres between the Merced River and Tenaya Creek, adjacent to the North Pines campground. This facility comprises a harness shop, a blacksmith shop, an office, a corral, a concession stable, a dog kennel, and employee housing.

Seven campgrounds in Yosemite Valley have a total of 817 campsites. These are not concessioner operated, but campers use concession facilities located elsewhere, such as showers, coin-operated laundries, stores, and restaurants.

Developed Areas Outside Yosemite Valley. Glacier Point is at the east end of Glacier Point Road. The developed area, which occupies about 10 acres, has parking space for trailheads and overlooks. It also contains a gift shop and snack bar.

Badger Pass, 5 miles west of the intersection of Glacier Point road and the south entrance road, is a 240-acre day-use winter recreation area with downhill ski slopes, a nordic ski trailhead, and a 750-car parking lot. It includes a ski school, a fast-food operation and snack bar with 400 seats inside and outside, ski rental and retail shops, a gift and clothing store, and child care services. Winter bus service is available from Wawona and Yosemite Valley.

The Wawona Hotel complex, which occupies about 13 acres, has 104 rooms in the main hotel and cottages. Food service includes a hotel dining room, a bar, and a golf shop snack bar, with a total of 110 inside and 50 outside seats. Other facilities are a store and gift shop, a golf course and pro shop, a tennis court, concession stables, and a service station. There is tour bus service from Yosemite Valley, winter shuttle bus service to Badger Pass, and shuttle service from the Wawona campground to Mariposa Grove.

Mariposa Grove, one of three giant sequoia groves in the park, is 3 miles east of the south entrance. A paved loop road, closed to private vehicles, winds through the grove. The primary concessioner operates the tram tour through the grove, and a gift shop.

Crane Flat lies on the northwest side of Yosemite Valley at the intersection of Big Oak Flat Road and Tioga Road. Within its 36 developed acres are a grocery/gift store and service station operated in summer and a National Park Service campground with 166 sites.

White Wolf, 1 mile north of Tioga Road between Crane Flat and Tuolumne Meadows, occupies 23 acres. The Park Service operates a campground at White Wolf, and the concessioner offers lodging in the form of 4 cabin rooms and 24 tent-cabins. Other facilities are a lodge building used for food service, registration, and a camping supply store; a bathhouse; concession stables; and employee tent-cabins.

Tuolumne Meadows is the major development along Tioga Road. This is a major day-use destination and the starting point for many backcountry trips. In addition to NPS campgrounds and other developments, structures associated with concession operations are the Tuolumne Lodge (with 69 tent-cabins), a tent-frame dining room, a registration building, and a shower house. Employee housing is located primarily near the lodge. Stretched along the south side of the road are a tent-frame grocery store and snack bar, a service station, and a mountaineering center and shop. North of the road is the concession stables area.

The five High Sierra camps, located within wilderness enclaves, contain a total of 56 tent-cabins.

AFFECTED ENVIRONMENT

El Portal, a 1,200-acre area adjacent to the western park boundary, functions primarily as an employee residential area and a maintenance and utilities site. It also houses an NPS administration and research office and community facilities. Visitor services such as motel lodging, gift sales, and restaurant facilities are available on adjacent private lands. El Portal was designated an administrative area in 1958. Its establishment was accomplished by acquisition of private land and a land transfer with the Forest Service. Present concessioner facilities consist of a gas station and a small grocery store.

NATURAL ENVIRONMENT

Vegetation

Vegetation communities that would be affected by these proposals are chaparral (below 3,000 feet elevation—El Portal), mixed conifer (3,000–7,000 feet—Yosemite Valley, Wawona), red fir (6,500–8,500 feet—Badger Pass, Glacier Point, Merced Lake High Sierra camp), lodgepole pine/subalpine (8,500–10,000—White Wolf, Tuolumne Meadows, and the High Sierra camps Vogelsang, Sunrise, May Lake, and Glen Aulin). The 1980 GMP contains more detailed descriptions of common plant and wildlife species found in each vegetation community.

Vegetation communities vary in sensitivity to use, disturbance, and recovery time. In general, the higher the elevation or the wetter the area, the greater the sensitivity of an area. Subalpine meadow is most fragile because of a short growing season, harsh climate, and thin soils. The mixed conifer community is less sensitive to disturbance than other communities because it has a relatively long growing season, well-developed soils, and sufficient moisture. Riparian and stream bank

areas in all communities are particularly susceptible to use and disturbance.

El Portal, at 2,000 feet elevation, is located in the chaparral community. Gray pine, blue and canyon live oak, and manzanita form the dominant vegetation. California black oak and ponderosa pine grow on cooler, north-facing slopes.

Yosemite Valley lies in the mixed conifer community. The vegetation is a combination of mixed conifer forest, oak woodland, and meadow. Ponderosa pine, incense cedar, and California black oak at lower elevations give way to Douglas-fir and sugar pine higher up, with canyon live oak on the talus slopes below the granite cliffs.

Both wet meadows and dry, grassy terraces, dominated by sedges and grasses, line the valley floor. Fewer sedges and more ferns characterize the dry terraces. Dry terraces at lower elevations occasionally support a woodland plant community dominated by California black oak. Cottonwood, alder, willow, and other riparian vegetation occur in a narrow band along the Merced River and the major creeks. Intensive use and occupation in Yosemite Valley have altered the original vegetation, mostly through trampling, the effects of fire suppression on species composition, vegetation removal for construction, and the intentional and accidental introduction of exotic plants.

Wawona, also in the mixed conifer community, has the same general vegetation as Yosemite Valley, including a riparian community adjacent to the South Fork of the Merced River. Major alterations to the vegetation include the golf course and the altered meadow vegetation in the formerly pastured area adjacent to the golf course.

Three groves of giant sequoias are in the mixed conifer community. The giant sequoias of Yosemite are one of the significant resources that contribute to the park's status as a world heritage site. The Mariposa Grove is the subject of a development concept plan/EIS to address removal of development from the grove.

Badger Pass ski area, between 7,200 and 7,400 feet, lies in the red fir community. This is the area of heaviest snowfall in the park. Red fir predominates around Monroe Meadow (the center of the ski area), with white fir on drier sites, quaking aspen on moist sites, and Jeffrey and lodgepole pine in mixed stands.

Glacier Point at 7,200 feet is situated in a transition area between mixed conifer and red fir, with elements of both communities present. Brushy species such as manzanita and chinquapin dominate dry, south-facing slopes.

Tuolumne Meadows, White Wolf, and the High Sierra camps lie in the lodgepole pine/subalpine community. Between 8,000 and 9,500 feet, where developments are located, pure stands of lodgepole pine dominate.

The meadows at Tuolumne Meadows, at 8,600 feet, are predominantly subalpine grasses, sedges, lupine, and penstemon, but lodgepole pine is encroaching in some locations. Tuolumne Meadows is the largest subalpine meadow in the Sierra Nevada. Most development at Tuolumne Meadows is situated in lodgepole pine, but the concession stables are in a meadow area.

White Wolf is in a dense stand of lodgepole pine. Western juniper, western white pine, and pockets of mountain hemlock are also characteristic of the lodgepole pine community. The High Sierra camps lie in the subalpine community, except for

Vogelsang, which is in a transition area between subalpine and alpine. The subalpine community is dominated by white-bark pine, which takes on a prostrate form near tree line.

Meadows are one of the components that make Yosemite's scenery unique in the world. Meadows are used by such species as the great gray owl, listed by the state as endangered, which hunts on forest-meadow margins.

Meadows are generally more sensitive to disturbance than forested areas at the same elevation. Trampling and soil compaction often cause major changes in species composition. Meadows are especially sensitive when there is a high water content, as in early spring; they become somewhat less sensitive as they dry out. Subalpine meadows such as Tuolumne Meadows are more sensitive than those at lower elevations because of the short growing season, which makes natural and assisted revegetation difficult. Monroe Meadow, at the base of the Badger Pass ski area, has been mechanically altered to remove woody vegetation. The vegetation there is now composed primarily of grasses, herbaceous plants, and shrubs.

Trees in developed areas and along park roads may be classified as hazard trees if they are likely to fall from disease or structural defects and if tree failure could injure people and property. The park has a hazard tree inspection and removal program. In Yosemite Valley, the trees most often removed are large ponderosa pine and incense cedar, since they are the dominant species in Yosemite Valley. An average of 700 trees are removed from the valley annually under the hazard tree program. Trees in the park, and especially Yosemite Valley, are susceptible to infection with root rot fungus (*Fomes annosus*) if damaged, which increases the chances of a tree becoming a hazard tree.

Threatened, Endangered, and Sensitive Species

Two federally listed endangered animal species are found in Yosemite National Park. Both are also listed as endangered by the state of California. The only species that is found in an area that could be affected by concession activities is the American peregrine falcon (*Falco peregrinus anatum*), which nests on El Capitan in Yosemite Valley. El Capitan is closed to climbing each year between January 1 and August 4 in the vicinity of peregrine falcon nests to protect the nesting birds. The other endangered species, the bald eagle (*Haliaeetus leucocephalus*), a rare but regular winter visitor, forages over rivers, lakes, and streams between 3,000 and 5,000 feet but does not nest in the park.

The great gray owl (*Strix nebulosa*) is a state-listed endangered species but has no federal status. The owls summer and nest in the vicinity of meadows from the mixed conifer forest up to the lower edge of the lodgepole pine community. Almost all nests that have been located are in the broken off tops of red fir (Gaines 1988). Preferred habitat for the owls is the meadows in the vicinity of Crane Flat and along Glacier Point Road. They winter in the moist meadows just below the heavy snow zone, which can vary from year to year. In mild winters, they may be found at higher elevations than usual, such as Summit Meadow. The owl has always been considered one of the rarest birds in the Sierra Nevada.

The willow flycatcher (*Empidonax traillii*) is a state-listed endangered species that is now rarely seen in the park, although it was once considered common below 5,000 feet. The last record for nesting of this species in Yosemite Valley was 1966, but the flycatchers still return to Wawona and Hodgdon Meadow to nest. Broadly open streams and especially river bottoms and

large meadows supporting lush stands of shrubby willows are the preferred habitat (Serena 1982). The decline in the statewide population of these flycatchers is due partly to habitat loss and partly to nest parasitism by brown-headed cowbirds (*Molothrus ater*). There are no data that document the rate of nest parasitism in Yosemite.

The limestone salamander, the Sierra Nevada red fox, the wolverine, and the California bighorn sheep are listed as threatened by the state and are federal candidate species. The limestone salamander (*Hydromantes brunus*) can be found in cracks and crevices in moist limestone and moss-grown talus in the chaparral community of the lower Merced River canyon. The highest recorded occurrence is at 2,500 feet. The fox (*Vulpes vulpes necator*) frequents meadow edges of dense forests above 7,000 feet in the red fir, lodgepole, and subalpine communities.

Although most "sightings" of wolverines (*Gulo gulo luteus*) are tracks in the snow at higher elevations, wolverines have been found in California as low as the mixed conifer vegetation community (Wilson 1982). California bighorn sheep (*Ovis canadensis californiana*) have been reintroduced to the eastern side of the park. The sheep have not been seen at any of the localities that would be affected by these proposals.

The California red-legged frog, the mountain yellow-legged frog, the foothill yellow-legged frog, the Sierra Nevada snowshoe hare, the northern goshawk, and the California spotted owl are federal candidate species found in Yosemite. All are listed as species of special concern by the state of California.

The California red-legged frog (*Rana aurora draytonii*) is found in ponds and slow-moving streams in the chaparral and

mixed conifer communities. Dense vegetation close to water and shaded water of moderate depth are important habitat features (Hayes and Jennings 1988). As important as habitat for the presence of red-legged frogs is the absence of aquatic predators such as bullfrogs. This species may be extinct in the Sierra Nevada because of the presence of bullfrogs.

The mountain yellow-legged frog (*Rana muscosa*) and the foothill yellow-legged frog (*Rana boylei*) are listed as rare by the park. There are specimens of both species from Yosemite Valley in the park museum. The mountain yellow-legged frog is found in permanent streams, often in meadows, and in the riparian area of rivers, ponds, and lake borders from 5,000 feet in the mixed conifer community up to 13,000 feet. The foothill yellow-legged frog is found in streams or rivers of the low woodlands, chaparral, or forest below 6,000 feet. Partially shaded shallow streams and riffles with a rocky substrate that is at least cobble-sized are important habitat components.

The snowshoe hare (*Lepus americanus tahoensis*) lives in fir thickets in the red fir, lodgepole, and subalpine communities; there are no records for the park.

The northern goshawk (*Accipiter gentilis*) nests in mature forests from the ponderosa pine up to the lodgepole pine zones, usually in dense stands broken by meadows, streams, brush or other openings. These uncommon residents require extensive stands of coniferous forest on both level terrain and steep slopes and canyons. They have been noted in Yosemite Valley, Crane Flat, White Wolf, Tuolumne Meadows, and Wawona. The nesting range is between 5,000 and 9,000 feet elevation.

The California spotted owl (*Strix occidentalis occidentalis*) occurs in dense, old-

growth mixed conifer forests below the level of heavy snow. There are records from Wawona, Mariposa Grove, Crane Flat, and Yosemite Valley, as well as other localities that would not be affected by these proposals.

Four federal candidate species that have no state status occur in areas affected by this proposal: the Wawona riffle beetle, the mountain quail, the loggerhead shrike, and the California horned lark.

The Wawona riffle beetle (*Atractelmis wawona*) was first discovered in 1946 in the South Fork of the Merced River near Wawona. The other known population of the species occurs in the Coast Range, 200 miles away. Both the larval and adult forms are totally aquatic, occurring in rapid, highly oxygenated streams. There are no data on what effect the diversion of water from the river has had or is having on beetle populations.

Mountain quail (*Oreortyx pictus*) live on brushy steep and rugged slopes in the chaparral zone but breed in higher elevations up nearly to timberline. They winter below the heavy snow line down to chaparral. There are records of this species nesting in the valley as well as in the Merced River canyon.

The loggerhead shrike (*Lanius ludovicianus*) occurs in arid open grasslands and woodlands of the foothills. Shrikes require exposed lookout posts from which to hunt and a few dense-foliaged trees or shrubs for cover and nesting. They occur in lowlands in spring and summer but occasionally are found in large, open meadows as high as the red fir zone in September and October. They have been seen in Yosemite Valley.

Horned larks (*Eremophila alpestris*) occur in the foothills and lower, and are rarely seen at mid-elevation on the west slope of

the Sierra because of a lack of suitably bleak habitat. They avoid trees and shrubs, favoring short, sparse grasslands on level ground or gentle hillsides. They have been seen in the valley.

Other federal candidate species that occur in the park but are unlikely to be affected by these proposals are Bohart's blue butterfly (*Philotiella speciosa bohartorum*), the spotted bat (*Euderma maculatum*), the California mastiff bat (*Eumops perotis californicus*), the Mount Lyell shrew (*Sorex lyelli*), the Mount Lyell salamander (*Hydromantes platycephalus*), the Sierra pygmy grasshopper (*Tetrix sierrana*), and the Indian Yosemite snail (*Monadenia hillebrandi yosemitensis*). These species are known from only a few historical sightings or occur in habitats that would not be affected by any of the proposals, such as rockslides or talus slopes. Swainson's hawk (*Buteo swainsoni*), a state-listed threatened species, is an extremely rare transient and would not be affected by any of these proposals.

The Pacific fisher (*Martes pennanti pacifica*) is considered rare in the park. It usually lives in heavy timber in the red fir and lodgepole pine communities, although there is a record from Chinquapin in the mixed conifer community.

The mountain beaver (*Aplodontia rufa californica*) is a park-listed sensitive species found in heavy shrubbery and thickets among fallen logs, along stream banks, and in meadows from the mixed conifer to the subalpine community. It has been recorded from Chinquapin and occurs in the vicinity of Badger Pass, particularly around the ski parking area.

No federally listed or proposed threatened or endangered plant species are known to occur in any of the areas that would be affected by these proposals. There is potential habitat for a federal candidate species, parasol or Bolander's clover (*Trifo-*

lium bolanderi), at Badger Pass ski area, although no plants have been found. No other candidate plant species are known to occur so near to concession facilities as to be affected by any of these proposals.

Several plant species that are listed as rare by the state of California and the park occur in proximity to concession developments. Tompkins' sedge (*Carex tompkinsii*) occurs on steep, dry rocky canyon sides in sandy or rocky soil in partial shade on south-facing slopes and, rarely, on east-facing slopes. It is found in the Merced River canyon between Arch Rock and El Portal on the north side of the river under the shade of canyon and interior live oak.

The Yosemite onion (*Allium yosemitense*) occurs in moist cracks and gravels on granite or metamorphic slabs and talus on steep east- and west-facing open slopes that become snow-free early in the year. It is found at El Portal on both sides of the river, in Cold Canyon, and west of Rancheria Flat.

Congdon's lewisia (*Lewisia congdonii*) occurs in the chaparral and mixed conifer communities on north-facing slopes in the shade. It is found in El Portal on the south side of the Merced River in Cold Canyon.

Congdon's woolly sunflower (*Eriophyllum congdonii*) is listed as rare by the state of California and threatened in the park. It grows on dry ridges on metamorphic rocks, scree, and talus in the Merced River canyon on both sides of the river, in chaparral and oak woodland. It is endemic to the canyon in the vicinity of El Portal and the South Fork of the Merced. It occurs on a saddle separating Rancheria Flat and Railroad Flat.

The black oak woodland in Yosemite Valley is considered a sensitive community. California black oak (*Quercus kelloggii*) grows on the north-facing slopes of the

upper chaparral community and is scattered infrequently at lower elevations of the mixed conifer community. It is found in Yosemite Valley and around Wawona. This species was probably more common in the valley when periodic fires swept through and kept coniferous trees at lower densities.

Water Resources

Yosemite is in the San Joaquin river basin. There are three main drainages in the park: the main stem of the Merced River, the South Fork of the Merced, and the Tuolumne River. The Merced and its tributaries drain the southern part of the park. The Merced forms the main drainage of Yosemite Valley. The river flows from east to west through the valley, making sweeping meanders within its floodplain. Important tributary streams that flow into the valley are Illilouette, Tenaya, Yosemite, and Bridalveil creeks.

The largest tributary of the Merced is the South Fork, which originates along the southern boundary of the park and flows through the Wawona area. The South Fork enters the main stem of the Merced several miles below El Portal.

The northern parts of the park are drained by the Tuolumne River, which originates near Tuolumne Meadows. The Lyell and Dana forks, major contributing streams, converge in the Tuolumne Meadows developed area. The Middle Tuolumne and South Fork of the Tuolumne originate in the vicinity of White Wolf, south and west of the Grand Canyon of the Tuolumne.

The park's rivers are characterized by marked seasonal variation in volume. High flows occur in the spring when snows melt from the High Sierra. Low flows generally occur between August and November.

Floodplains. The 100-year floodplains have been determined for the main stem of the Merced River in Yosemite Valley and at El Portal, and for the South Fork of the Merced River at Wawona. The elevation of the 100-year floodplain at Sentinel Bridge in Yosemite Valley is 3,965 feet above sea level.

A preliminary determination of which buildings lie in the 100-year floodplain of the Merced River in Yosemite Valley was made by overlaying a map of the floodplain on a map of Yosemite Valley buildings. An on-the-ground determination of the floodplain's actual boundaries would be required during the preliminary design process to ensure that all buildings lying in the floodplain have been identified.

Concession facilities that lie in the 100-year floodplain of the Merced River in Yosemite Valley are all of Housekeeping Camp, 6 of the Ahwahnee Cottages, at least 39 and possibly as many as 42 cabins with baths and the Pine motel unit at Yosemite Lodge, and the Yosemite Valley concession stables. At Wawona, the store, post office, and gift shop lie in the 100-year floodplain.

The Merced River is subject to large damaging floods when a warm Pacific front brings rain to the snow-covered high country. Major damaging floods were recorded in Yosemite Valley in 1867, 1871, 1890, 1919, 1937, 1950, 1955, 1963, and 1964. The 1937, 1950, and 1955 floods were 50-year floods, as measured at Pohono Bridge.

A recent analysis by the Water Resources Division of the National Park Service suggests that the channel capacities of the Merced River in Yosemite Valley are considerably lower in the upper part of the valley than in the lower part (Smillie and Martin). This will result in more frequent and severe flooding in the vicinity of Sen-

tinel Bridge, for example, than in the El Capitan meadow area. The period when the rivers may flood is generally between November and April, which is also the period of lower visitation, so that the majority of visitors are not at risk.

Wetlands. The wet meadows in Yosemite Valley, Tuolumne Meadows, and Monroe Meadow at Badger Pass ski area are wetlands. Some of the meadows are only seasonally wet but still meet the definition of wetland in the *Federal Manual for Identifying and Delineating Jurisdictional Wetlands*. Wetland delineation includes evaluation of plant species, soil types, and hydrologic conditions. Riparian vegetation indicates areas likely to be classified as wetlands. Riparian vegetation is found adjacent to the main stem of the Merced River, the South Fork of the Merced, and the Tuolumne River.

Water Quantity. Enough water is available for proposed concession-related developments at all developed areas in the park except Wawona. Yosemite Valley and El Portal use groundwater (wells). At Tuolumne Meadows, the water source is the Dana Fork of the Tuolumne River (surface water). Badger Pass uses groundwater. At White Wolf, water is supplied from a spring and a well.

At Wawona, surface water from the South Fork of the Merced is collected and treated for distribution. Water diversions from the river vary from a winter average of 50,000 gpd to 180,000–200,000 gallons on an average summer day. Peak use has resulted in diversion of as much as 350,000 gpd. Since 1980, water constraints have become an issue related to expansion of development. Availability of water at Wawona is primarily a seasonal constraint during dry summers. These constraints will be addressed in more detail in a development concept plan.

A Wawona water study planned at the time of the GMP was conducted in 1985 to evaluate alternative water sources and water supply systems so that adverse effects could be mitigated and a consistent supply of high-quality water could be ensured. The study resulted in a determination that treated effluent from the wastewater treatment system could be used for golf course irrigation. This was expected to reduce surface water diversion by approximately 102,400 gallons per day (gpd) averaged over the year (irrigation rate of 1 inch per day). Use of effluent for golf course irrigation has been implemented. When there is insufficient effluent to irrigate the golf course, effluent is supplemented by diversion of untreated surface water. Golf course irrigation during hot summer months can reach 200,000 gpd.

At this time (following six years of drought in California), an increase in surface water diversion from the South Fork of the Merced River does not appear possible as a reliable year-round water source for Wawona. The U.S. Geological Survey is conducting aquifer characterization studies at Wawona to determine the potential for supplementing the existing surface water supply. In addition to the aquifer, there is a spring that could supply Wawona with sufficient water.

Because it is acknowledged that water demand can exceed supply during dry summer months, Wawona has an approved water conservation plan geared to flow rates of the South Fork of the Merced River. Under that plan, the river is monitored twice weekly when the river flow drops to 10 cubic feet per second (cfs). (One cfs is equal to approximately 650,000 gpd.) At 6 cfs, letters are sent to concessioners and residents requesting voluntary conservation. At 3 cfs, a second letter is sent informing water users that conservation (no car washing, no watering of lawns or the golf course) is mandatory.

When levels drop below 3 cfs, the water conservation plan requires that water cost rates be increased; this element of the plan has never yet been implemented.

Water Quality. No recent comprehensive data sets are available on water quality in the South Fork of the Merced or the Tuolumne River. The U.S. Geological Survey tests water quality for the main stem of the Merced River at Happy Isles in upper Yosemite Valley and El Portal. Synoptic sampling of water quality in the main stem of the Merced was conducted in 1990 by the Water Resources Division of the National Park Service. The surface water quality of the Merced River and associated tributaries is considered very good for most beneficial uses, as defined by the California Water Resources Control Board. Beneficial uses in the valley include wildlife habitat, cold freshwater habitat, noncontact recreation, canoeing and rafting, and water contact recreation.

Concern for water quality in Yosemite Valley has increased in recognition of impacts associated with use of the riparian zone of the Merced River. The riparian areas provide a buffer zone that functions as a filter and soil stabilizer.

Wastewater treatment plants at El Portal and Wawona are adequate for planned developments. At Tuolumne Meadows, two sewage lagoons and four spray fields are used for sewage treatment. Use is rotated among the spray fields to avoid saturation of a spray field and subsequent runoff. Should runoff occur, a catchment ditch and return system are in place to prevent contamination of the river.

Expansion of the spray field is not anticipated at this time, although it was suggested in the 1980 GMP. An examination of the system by the NPS Denver Service Center in 1989 found no evidence that the existing wastewater system results in

contamination of the river or other water quality problems.

In past years there have been problems with overload on the septic system at Vogelsang High Sierra Camp. The concessioner is finishing installation of composting toilets and uses a "gray water" system for other wastewater (employee showers, wash water). The existing leach field system was recently repaired, but it will not be required once composting toilets are functioning. The sewage system is not causing any adverse effects on water quality at Vogelsang.

At Sunrise camp, there are inadequacies in the sewage and potable water systems; work will be required in the near future. However, the High Sierra camps are not causing any adverse effects on water quality in the surrounding wilderness.

The sewage treatment systems at Tuolumne Meadows and Wawona have been affected in the past by improper use of grease traps at food service facilities. When grease traps are not cleaned and maintained regularly, grease can clog the sewage treatment system.

Wild and Scenic Rivers Values. Three components of the national wild and scenic rivers system are located in the project area of these proposals. Within Yosemite National Park, the Tuolumne River (except for Hetch Hetchy Reservoir), including the Dana and Lyell forks, the entire Merced River main stem, and the entire South Fork of the Merced River are in the national system. All were legislatively designated after completion of the GMP: the Tuolumne River in 1984 and the Merced and South Fork Merced rivers in 1987.

Wild and scenic river management plans are scheduled for these rivers. The plans will be integrated with the river implementation plans but will be separately

identifiable documents. Management of most of the Tuolumne River is governed by the *Yosemite Wilderness Plan*. In the section not covered (Tuolumne Meadows) management prescriptions will be addressed in the scheduled plan.

With respect to the Merced River systems, the designating legislation provided that management would be addressed in any future amendment or revision of the GMP. Any action plans involving wild and scenic river segments must address and be consistent with wild and scenic river management. Such action plans include the development concept plans for Yosemite Valley, El Portal, Wawona, and Tuolumne Meadows. In all actions affecting any portions of the designated rivers, the National Park Service will adhere to the management policy of non-degradation and enhancement, regardless of the wild, scenic, or recreational classification of the particular segment affected.

The Wild and Scenic Rivers Act (P.L. 90-542, as amended) requires that a corridor be established adjacent to a designated river segment, that the "outstandingly remarkable" river values for which the river was designated be defined for each segment, and that the outstanding values be protected and enhanced within the corridor. Pending completion of plans that will establish management prescriptions for the Tuolumne Meadows section of the Tuolumne River and the Merced River sections, an interim management boundary of 1/4 mile on each side of these rivers has been established, except for the Yosemite Valley segment of the Merced River, where the interim boundary is either 1/4 mile or the valley wall, whichever is narrower. The outstanding river values have not been defined.

The main stem of the Merced River in Yosemite Valley has been severely affected by visitors' use of the riparian zone

and by past management practices. Trampling of riverbanks has caused soil compaction and accelerated erosion rates, reduced vegetative cover, and altered vegetation species composition. Past management practices that altered the natural values of the river included removal of large woody debris such as fallen trees and logs to accommodate river rafting and protect bridges, and placement of riprap revetments to control channel migration. The park has developed a strategy for river restoration and has obtained funding to implement restorative measures, including revegetation.

Air Quality

Yosemite National Park is a mandatory class I area as classified under the Clean Air Act and amendments (42 USC 7401 et seq.). This is the most stringent air quality classification; it allows only a very small amount of additional degradation of air quality. The Clean Air Act provides that federal land managers have an affirmative responsibility to protect the park's air quality related values (including visibility, plants, animals, water quality, soils, cultural and historic structures and objects, and visitor health) from adverse impacts of air pollution. Section 118 of the Clean Air Act requires the park to meet all federal, state, and local air pollution control laws and requirements.

The park lies in parts of three counties (Madera, Mariposa, and Tuolumne). Madera is one of eight San Joaquin Valley counties that have been mandated under state law to form a unified air pollution control district to regulate the air quality of the entire basin. Mariposa and Tuolumne counties maintain individual county air pollution control districts but coordinate mutual concerns through the Mountain Counties Air Pollution Board.

Yosemite has an extensive air quality monitoring program and a research program to determine how air quality affects park resources. This program involves monitoring of ozone, the bioeffects of ozone, visibility, and particulates; however, the program has not been in effect long enough to determine long-term trends. The results of monitoring for ozone, fine particulate matter, and visibility are discussed and graphically depicted in Appendix B.

Ozone has been monitored at Yosemite Valley since July 1989, and at Wawona and Camp Mather (northwest of Yosemite Valley) since 1987. The California Air Resources Board also monitors ozone at Turtleback Dome, which is south of Yosemite Valley but is considered an indicator of valley conditions. All monitoring sites have recorded elevated levels of ozone, and the Wawona, Turtleback, and Yosemite Valley stations occasionally exceed state standards (0.09 parts per million) in summer. The Wawona monitoring site measured several exceedences of the national ambient air quality standard of 0.12 parts per million during the summer of 1987. No exceedences have been recorded since then.

The park established permanent pine plots in 1991 in the vicinity of the Wawona and Camp Mather ozone monitors to help determine air pollution impacts on ponderosa pines, a species known to be sensitive to ozone. A 1982 survey documented visible ozone damage on needles of sensitive pines throughout the park.

Most of the park's visibility monitoring equipment is at Turtleback Dome. Visibility, measured by transmissometer since August 1988, is lowest in summer because of the elevated particulate concentrations.

The fine particulate monitor at Turtleback Dome measures particles 10 microns in

size or smaller. Fine particulates can cause visibility impairment or acid deposition. Fine particulates have been sampled periodically since 1982 but there is no continuous record. The state health standard for this pollutant is much more stringent than the federal standard, and this state standard is occasionally violated in Yosemite Valley during all seasons. The California standard is 50 micrograms per cubic meter in a 24-hour period. The federal standard (150 mcg/m³ in a 24-hour period) is violated only during unusual events such as wildfires. Levels of particulate matter in Yosemite are highest in the summer season and lowest in winter.

The National Park Service installed a carbon monoxide monitor in Yosemite Valley in January, 1992. The initial data indicate that monthly maximum 1-hour carbon monoxide concentrations have not exceeded 6 parts per million (ppm), which is significantly below the 1-hour national ambient air quality standard of 35 ppm.

Surrounding mountain counties are investigating the possibility of establishing air quality monitoring stations in the vicinity of the park.

The air quality related values of Yosemite are affected by pollution both generated within the park and transported into the area from the San Francisco Bay area and the San Joaquin Valley. Within the park, air pollutants are generated by motor vehicles, boilers, commercial operations, and wood combustion from fireplaces, campfires, and prescribed fires. During certain weather conditions, visibility can be seriously degraded and state and federal health standards exceeded by particulates from pollution generated in the park by combustion. Carbon monoxide levels also can be elevated by in-park pollution sources (transportation, campfires, prescribed fires, wildfires), but the results of monitoring are not yet available.

Transported pollutants, a regional problem, affect visibility and vegetation in the park and degrade the clean air that visitors to a national park expect. Even minimal visibility impairment is detectable; it usually is caused by human sources. Impairment of visibility is caused primarily by fine particulates, a majority of which are transported into the park.

Ozone also is predominantly a transported pollutant. Ozone is not emitted directly from a source; rather, it is formed when byproducts of fossil fuel combustion react with reactive organic gases in the presence of sunlight.

Regionally transported pollutants affect Yosemite's air quality to some degree throughout the year. Regional and local meteorological conditions (stagnant air and inversion layers) and acute in-park events (wildfires, prescribed fires, campfires, and traffic congestion) can combine to intensify air pollution problems experienced by the park.

Scenic Resources

The most important scenic elements in Yosemite Valley are the waterfalls, granite cliffs and domes, and meadows. These elements also are important when viewed from Glacier Point, which features an expansive view of the High Sierra as well as Yosemite Valley. At Tuolumne Meadows, the meadows, river, and mountain views are the main scenic elements. The Merced, South Fork Merced, and Tuolumne rivers are also scenic resources. Important scenic elements at White Wolf and Wawona are the meadows and forest vegetation.

The view from the main Glacier Point overlook is directly down to Curry Village. The old Curry dump site is east of Curry Village but is not visible from the

main Glacier Point overlook. Stables, campgrounds, the Ahwahnee Hotel, Housekeeping Camp, and Camp 6 are visible in the middle distances. Yosemite Village is also visible; the maintenance area, concession warehouse, and visitor center are most prominent. Yosemite Lodge cannot be seen from this overlook.

From the Yosemite Falls trail overlook (about ½ mile up the trail at an elevation of 5,000 feet), most of the visitor facilities at Yosemite Lodge are visible directly below. The maintenance area of Yosemite Village is visible to the east.

Wilderness

The Yosemite Wilderness was designated by Congress in 1984. Of 747,892 acres in the park, 706,348 are wilderness (94%).

Wilderness boundaries were drawn to allow for future expansion of essential development. The wilderness boundary description complies with the requirements of Public Law 98-425, dated September 28, 1984, in section 107 of title 1 of the California Wilderness Act of 1984. Wilderness boundaries generally were drawn to be either 100 or 200 feet from the centerline of unpaved or paved roads, respectively, and generally 100 feet from structures, buildings, or other developments that existed at the time of designation.

Among the potential wilderness additions described in PL 98-425 are Ostrander Ski Hut and the following High Sierra camps: May Lake, Glen Aulin, Vogelsang, Sunrise, and Merced. Currently the wilderness boundary is 100 feet from all structures, buildings, and any other development at the camps (including septic tanks, sewer lines, and leach fields associated with the camps) and 100 feet from the water system filtration building and water intake at May Lake. These parcels will become part

of the Yosemite Wilderness if the High Sierra camps are removed.

CULTURAL RESOURCES

Historic Resources

Historic resources are physical remains or sites resulting from human activity post-dating written records for an area. These resources include structures such as buildings, bridges, roads, trails, and sites or locations associated with events or persons that were significant in an area's history. Historic resources in Yosemite National Park were identified and evaluated in 1980 through a cultural resource management plan, a preliminary case report related to section 106 of the National Historic Preservation Act, and a memorandum of agreement between the National Park Service and the Advisory Council on Historic Preservation. A historic resource study published in 1987 identified and evaluated structures and sites not addressed in those earlier documents.

Yosemite Valley. Several properties in Yosemite Valley would be affected by the alternatives outlined in this plan. Those that are listed in, or have been determined eligible for, the National Register of Historic Places are listed below.

The Ahwahnee Hotel, designed by architect Gilbert Stanley Underwood and built in 1925, is a national historic landmark. The structure itself would not be affected, but the tennis courts would be removed.

Yosemite Village Historic District, which includes the Pohono Indian Studio (c. 1925), now used as an art activity center, and the Ansel Adams Gallery complex (1925).

Camp Curry Historic District at the base of Glacier Point: several bungalow

units built in 1918–1922, canvas cabins dating from the late 1920s and early 1930s, the Stoneman House (late 1960s alteration of a 1913 auditorium/dance hall), and other miscellaneous facilities.

Two areas that would be affected by the alternatives but whose components have been evaluated and determined ineligible for the National Register are the Yosemite Lodge registration building, built in 1956 (the lodge guest area consists of both motel-style and cabin accommodations), and the concession stables and associated structures, which were erected in the present location in 1925.

Outside Yosemite Valley. The Wawona Hotel and Pavilion (Thomas Hill Studio) are listed on the National Register. This Victorian hotel complex of seven structures is significant for its architectural features as well as its historical associations with early California commerce and landscape painter Thomas Hill. Structures include the Pavilion (former Hill Studio), the Wawona Hotel, Little Brown (Moore Cottage), Long Brown (Washburn Cottage), Long White (Clark Cottage), Manager's Cottage (Little White), and the Annex. The complex was designated a National Historic Landmark on May 28, 1987.

In Tuolumne Meadows are a number of architecturally and historically significant structures constructed in the rustic style, but none of these buildings are concession facilities.

White Wolf Lodge was nominated to the National Register of Historic Places in 1988 for architectural significance.

Archeological Resources

Humans have lived in the area now occupied by Yosemite National Park for more

than 3,000 years. The presence of a good resource base and mountain passes through the Sierra Nevada to the Great Basin have made the area an attractive place to live. In particular, the obsidian needed to make tools was available only on the eastern side of the mountains. The presence of acorns, deer, and other food resources on the western side of the Sierra Nevada created an incentive for trade across the mountains.

Three basic cultural complexes have been defined, but there is still a great deal to be learned about the precise time each of these peoples occupied the area, what they were doing in a particular place, and how they lived. The earliest, known as the Crane Flat Complex, may date as early as 1000 B.C. and last until about A.D. 500. It is characterized by larger, distinctive projectile points and by mano and slab metates (grinding stones). These implements imply the use of the atlatl and the exploitation of seed resources, as well as a somewhat mobile living pattern.

The Tamarac Complex dates from about A.D. 500 to A.D. 1200. Smaller projectile points suggest a shift to the bow and arrow, and small, deep bedrock mortars associated with the sites of this time period indicate repeated, long-term use of a given location. Seeds were probably still the predominant vegetable food.

The Mariposa Complex begins about A.D. 1200 and lasts until Euroamerican contact in about A.D. 1850. These people were the immediate ancestors to the Miwok peoples who inhabited the area at the time of contact with Euroamericans. Archeological sites indicate a much more varied resource base than in previous times, although very small projectile points may suggest a somewhat more limited access to obsidian than in previous centuries. Larger, shallower bedrock mortars indicate that acorns as well as seeds

were processed. The appearance of steatite vessels and beads and clamshell beads suggest a wider trade network that may have included coastal peoples. Pictographs and cremation of the dead are also characteristic of the period.

The historic period, after Euroamerican contact, is better documented than earlier periods, which rely solely on archeological remains to tell their story. The Miwok were the primary occupants, although the Pohonichi lived in the Wawona area. The former group traded extensively over the Sierra Nevada with the Mono Kuzedika Paiute. The Miwok lived in cedar bark dwellings, built large ceremonial dance houses, and used bedrock mortars for processing food (mostly acorns). They lived in permanent villages in El Portal, Yosemite Valley, and Wawona, and in summer they kept smaller, dispersed camps scattered throughout the higher elevations.

All the major development areas in the park coincide with archeological districts listed on the National Register of Historic Places. In particular, the Yosemite Valley Archeological District contains at least 98 sites; the El Portal Archeological District has 17 sites; the Wawona Archeological District contains at least 42 sites; and the Tuolumne Meadows Archeological District contains at least 58 sites. Components of all three cultural complexes are present in each district.

Archeological sites appear mostly as bedrock mortars surrounded by a dark, organic-stained soil containing artifacts and wasteflakes from the manufacture of stone tools. Some pictograph sites are apparent as well. Many are deep, exhibiting evidence of a long-term use, and occasionally remains are buried with no surface manifestation at all. Sites are often located at the transitional zone between forest and meadow, where resources from both envi-

ronments could best be exploited. The occupants of the sites appear to have favored locations that were warm in winter, shaded in summer, and near to water.

All archeological sites within the Yosemite Valley and El Portal archeological districts are considered to be significant under criterion D of the National Register of Historic Places (may yield information of importance to history or prehistory). Any archeological site found within the boundaries of an archeological district is considered to be a contributing property. As such, they enjoy full protection of the law and NPS policy.

Individual sites within the archeological districts vary by type, size, depth, complexity, length of occupation, variety of remains, and potential to yield important scientific information. An archeological research design was prepared in 1981 (Moratto 1981) to provide guidance in assessing the research potential of a site. Six basic research domains were defined: paleoenvironment, cultural chronology, economic patterns, settlement patterns, demography, and social organization. Each domain included four to six sub-domains. These themes establish the criteria by which an individual site's significance is evaluated.

LOCAL ECONOMIES

The counties most likely to be affected by this *Concession Services Plan* are Mariposa, Tuolumne, and Mono. A comparison of the population/income profiles of the three counties is summarized in table 5. Since 1980, approximately 1,350 lodging units have been added at Oakhurst, Fish Camp, Mariposa, and other locations near the park; 632 units were available in 1980, and approximately 1,985 units were available or under construction in 1991. In addition, other hotel, motel, and resort operations are in the planning stage.

Mariposa County received approximately \$6 million in local taxes during the 1989–1990 tax year. Of this total, transient occupancy taxes (hotel tax) constituted 41%; secured property taxes (real estate taxes), approximately 30%; sales taxes, 16%; unsecured property taxes (personal property such as car, boat, RV), 3%; and other miscellaneous categories of local taxes, 10%. From concessioners on government land in Yosemite, including El Portal administrative site, Mariposa County receives approximately \$2.6 million annually.

Tuolumne County received approximately \$12 million in local taxes during the 1989–

TABLE 5: POPULATION INCOME CHARACTERISTICS, 1990 TAX YEAR
MARIPOSA, TUOLUMNE, AND MONO COUNTIES

	Mariposa County	Tuolumne County	Mono County
Approximate Population	14,400	48,900	10,000
Total personal income per capita	\$ 16,200	\$ 14,800	\$ 18,800
Income			
Total income from services ¹	61,186,000	102,665,000	52,838,000
Total income from retail trade	7,648,000	55,230,000	21,187,000
Total income from manufacturing	4,311,000	34,272,000	622,000
Total income from federal government	36,913,000	95,426,000	31,338,000
Total income from farming	2,816,000	4,434,000	2,957,000

1. Primarily from hotels and lodging.

AFFECTED ENVIRONMENT

1990 tax year. Of this total, secured property taxes constituted 71%; sales taxes, 16%; transient occupancy taxes, 5%; unsecured property taxes, 3%; and other miscellaneous categories of local taxes, 5%. From the concessioner that operates at Tuolumne Meadows, Tuolumne County receives approximately \$65,000 annually.

During the 1989-1990 tax year, Mono County received \$12,819,506 in property taxes, \$1,493,080 in unsecured property taxes, and \$439,184 in transient occupancy taxes. Mono County receives no tax monies from concessioners operating within Yosemite National Park.

ENVIRONMENTAL CONSEQUENCES

INTRODUCTION

Impacts of the proposal have been revised according to new information and suggestions brought to the attention of the National Park Service during the review process. Impacts of alternative A in this document are paraphrased from the *Final Environmental Impact Statement: General Management Plan* (NPS 1980a), published in October 1980, because alternative A is the 1980 GMP proposal. Only the impacts that could be attributed to actions affecting concession operations are summarized here; in the 1980 EIS, the impacts from NPS and concession development were combined. Impacts that were not anticipated in 1980 or those for which new information has been obtained have been included.

Impacts are addressed at a general level in this document because preliminary designs have not been prepared for each developed area. At this stage of planning, only the number and general location of structures that would be removed or constructed are known; an accurate estimate cannot be made of acreage of disturbance, and the restoration that would occur is not known. Rather than use acreage estimates of disturbance that would be likely to change during the design process, disturbance is quantified in some cases by giving the numbers of structures involved.

In most cases involving construction, the construction site is now occupied by structures that would be removed, so that there would be no net disturbance. In other cases, functions would be moved within or between existing structures, so that no new construction or disturbance would be required. A site-specific development concept plan accompanied by an EIS or an environmental assessment will

be prepared for each developed area. The EIS or environmental assessment accompanying each development concept plan will contain detailed assessments of the impacts when they can be quantified with some certainty and accuracy. A side-by-side comparison of the impacts of the alternatives is presented in table 6 (page 81).

ALTERNATIVE A: IMPLEMENT GMP CONCESSION ACTIONS

Impacts on Visitors' Use of Concession Facilities and Services

In total, a parkwide decrease of 230 accommodation units is proposed. Parkwide, the overnight use level for accommodations would decrease by 10.5% from 1980 levels and by 12.9% compared to present levels. Available lodging in Yosemite Valley would decrease by 265 rooms (a reduction of 17.5% from 1980 and 17.4% from the existing level).

Because of the reduction in overnight facilities, the number of people who would be able to stay overnight in the park would decline. This would cause some inconvenience and disappointment for people who want this experience. However, since 1980, additional rooms have been built in communities adjacent to the park; this would mitigate some of the inconvenience.

There would be 297 fewer lower-priced rooms under alternative A compared to present levels. The percentage of lower-priced rooms available parkwide would decrease from 79% to 65%. This could cause inconvenience and economic hardship for people who wanted to occupy lower-priced units but could not obtain

them. However, the lower-priced units are the least desired, based on the occupancy rates and the order in which they are filled. Thus, more visitors would be able to get better-quality rooms than before, which would increase visitor satisfaction.

Food service seats in Yosemite Valley would decrease by 32%, from 2,385 to 1,620. Parkwide, food service seats would decrease from 2,725 to 1,910 (29.9%). Decreased seating would result in inconvenience to visitors and increase the amount of waiting time at food service areas. It is expected that some visitors would make more trips between food service areas to avoid crowding and waiting.

Visitors would experience inconvenience from construction activities. Although construction would be scheduled to avoid the heaviest use times, some impact would be unavoidable because the time of year appropriate for construction is also the main season for visitation.

The small percentage of visitors who enjoy tennis might be disappointed to find this activity eliminated from Yosemite Valley. Golf and tennis would continue to be available at Wawona and at numerous resorts in the Sierra Nevada.

The ice rink at Curry Village would be removed and replaced by a portable ice rink that would be installed seasonally. Ice skating would continue to be available for those who enjoy this activity.

Most changes in recreational opportunities in the park would not be expected to cause major changes in the demand for recreation outside the park. Neighboring resorts might be affected by a decrease in available overnight accommodations in the park of about 275 rooms per night. This would lead to an increased number of requests for accommodations near the park during peak season.

Crosscountry skiing would be enhanced by the addition of facilities and rental operations at Crane Flat. Besides being an entry point for skiing in the high country, Crane Flat is already used for crosscountry skiing, sledding, tobogganing, and playing in the snow. People entering the park at Big Oak Flat to participate in these activities would no longer have to drive on to Badger Pass for rental equipment.

The frequency of large conventions would decline with restriction of such meetings to the off-season. Some groups that have held meetings in the park for a number of years would be disappointed, but members as individuals would be able to visit the park.

If the Wawona water conservation plan was in effect during low flow periods in late summer, visitors staying in Wawona might be required to use less water. Mandatory water conservation has never been enforced yet. Alternative A would increase water use at Wawona by up to 4,300 gallons per day (gpd), and might trigger mandatory water conservation.

Impacts on Natural Environment

Vegetation. Most impacts on vegetation from this alternative would be caused by construction of buildings, parking areas, and roadways or by removal of such facilities and subsequent restoration of the vacated area. The direct, primary effects of each construction project would be the removal of overstory and understory vegetation from the area to be occupied by the facility and trampling or cutting of vegetation in the surrounding area.

Relocation of a building's functions would involve new construction in some cases. In other cases, the functions would be moved to an existing building. Buildings or facilities that would be removed from

Yosemite Valley under alternative A are the Ahwahnee tennis courts, Degnan's, the garage, the Yosemite Village service station, the primary concessioner's headquarters and warehouse, 117 units of various types from Yosemite Lodge, 24 tent-cabins from Housekeeping Camp (each tent-cabin contains two housekeeping units), and the permanent ice rink, for a total of 148 buildings.

Buildings and facilities that would be constructed are maintenance and support facilities at the Yosemite Village maintenance area, a grocery store at the Curry Village ice rink, a portable ice rink to be installed seasonally at Curry Village, and a commercial visitor services area and concession maintenance facilities at El Portal. Buildings or facilities that would be relocated are the Glacier Point snack bar and food service, the White Wolf concession stables, and the Tuolumne Meadows concession stables.

Although the 1980 EIS did not provide any specific estimates of acreage disturbances or restoration, some approximations are possible. Removal of the Ahwahnee tennis courts would allow restoration of 1-2 acres of meadow/black oak woodland. Removal of Degnan's would allow restoration or landscaping of 0.4 acre. Removal of the service station and garage would allow restoration of about 1.5 acres of meadow/oak woodland. Removal and restoration of the primary concessioner warehouse would affect about 1.6 acres of oak woodland. Removal of 117 buildings at Yosemite Lodge would involve about 10 acres of riparian area and mixed conifer forest. Removal of 24 cabins (48 units) at Housekeeping Camp would allow restoration of about 2 acres of riparian area.

An accurate estimate of the area that would be disturbed by construction of new facilities is not possible until a preliminary design is prepared. Rough esti-

mates of disturbance attributable to new construction are 1 acre for the Glacier Point snack bar and gift shop, 2-3 acres of lodgepole pine forest for the White Wolf concession stables, and 10-13 acres of lodgepole pine forest for the Tuolumne Meadows concession stables.

Restoration of meadow would be possible after removal of the concession stables at White Wolf (2-3 acres) and Tuolumne Meadows (15 acres). The area that could be restored in the Tuolumne Meadows site is larger than the area that would be needed for new construction because an access road would be removed along with the stables. Although the Glacier Point site is located in the red fir community, the site itself is primarily a granite substrate with scattered shrubs. It is anticipated that restoration would involve less than an acre of actual building disturbance and would not be successful unless visitor foot traffic was managed.

Indirect effects on vegetation would result from foot traffic and the alteration of the natural fire regime. Foot traffic to and around buildings would trample herbaceous vegetation and tree seedlings. Prescribed fire would continue to be restricted in the more highly developed east end of Yosemite Valley. An altered fire regime results in changing species composition as the meadows are invaded by mixed conifer vegetation and contributes to the increased incidence of plant disease in the forest as it becomes unnaturally dense. Supplementary fuel management practices are proposed in the Yosemite fire management plan to mitigate adverse impacts of past fire management practices.

Visitation would be expected to increase slightly in the nonsummer months because there would be more all-season lodging available. The slight increase would not be expected to cause any ad-

verse effects on vegetation because of the overall decrease in available lodging.

Although there would be no significant proposal-related effects on vegetation during nonsummer months, the gradually increase in overall visitation could potentially affect vegetation. Most vegetation is dormant in winter and would not be significantly affected by slight increases in visitation anticipated for that season. The effects on vegetation caused by increased visitation to Yosemite Valley in spring, when the ground is wet, would be mitigated by ongoing resource management programs such as closing old meadow trails and restricting random foot traffic in meadows. Also mitigating the effects would be increased revegetation programs and the Merced River restoration effort.

Threatened, Endangered, and Sensitive Species. Although no direct impacts on threatened or endangered species were anticipated as a result of the proposals in the 1980 GMP, there are general effects on wildlife directly associated with the loss or gain of habitat. These impacts apply to threatened, endangered, and sensitive species as well as to wildlife with no special status. Removal or restoration of vegetation would affect both the primary consumers of plants and secondary consumers, or predatory species, that inhabit the area where the change occurs.

The Sierra Nevada snowshoe hare, Sierra Nevada red fox, wolverine, and Pacific fisher inhabit the lodgepole pine community. Overall, a small habitat loss would occur in this community from relocation of the stables at White Wolf (2–3 acres) and Tuolumne Meadows (10–13 acres). The slight increase in restaurant seating at Tuolumne Meadows and White Wolf would slightly increase the traffic and visitation to those areas, although the majority of restaurant patrons would be expected to be those already staying in

lodging in those areas. No measurable effects on the sensitive species would be expected to result from this alternative.

Reduction of flow in the South Fork of the Merced River from increased diversion to provide water for additional rooms with baths at Wawona could result in lowered dissolved oxygen levels in the river. The federal candidate Wawona riffle beetle prefers highly oxygenated water. Water use at Wawona would be expected to increase by an estimated total of about 4,000–4,300 gpd. (The draft proposal contained an incorrect estimate of 8,200 gpd. See appendix C for corrected water use estimates.) Extreme low flows in the river are considered to be 1 cfs (approximately 650,000 gpd). The river flows have not been lower than 6 cfs even following six years of drought. It is unlikely that increased diversion amounting to less than 1% of 1 cfs would lower dissolved oxygen enough to affect the beetle significantly.

Water Resources. This section contains discussion of the effects from actions of alternative A on the quality and quantity of the park's water resources, floodplains, wetlands, and wild and scenic rivers.

Floodplains — An on-the-ground determination of the actual boundaries of the 100-year floodplain would be required during the preliminary design process to ensure that all buildings lying within the floodplain have been identified. Structures to be removed from the 100-year floodplain of the Merced River in Yosemite Valley are 24 structures (48 units) from Housekeeping Camp that are located within 100 feet of the river and all the Yosemite Lodge units (between 39 and 42 cabins with baths and the Pine Lodge) that are within the 100-year floodplain. Structures that would remain in the floodplain are six of the Ahwahnee cottages, all remaining structures at Housekeeping Camp, the Yosemite Valley concession

stables, and the Wawona post office, store, and gift shop.

Structures in the floodplain affect the natural beneficial floodplain values and present potential risks to life and property. The 100-year floodplain would benefit from removal of structures because restoration of natural floodplain values would be possible. In addition, the risk to life and property would be reduced.

Removal of structures from the 100-year floodplain would be consistent with NPS policy as described in NPS floodplain management guidelines. NPS guidelines for implementing Executive Order 11988, "Floodplain Management," require that residential structures be located out of the 100-year floodplain where feasible to minimize harm to life, property, and natural floodplain values.

There are no feasible alternative nonfloodplain sites for the Ahwahnee cottages, Housekeeping Camp, and Pine Lodge because of the lack of suitable space in Yosemite Valley.

Creating new disturbance to relocate structures is not acceptable in Yosemite Valley. In cases where feasible alternative sites are not available out of the floodplain, mitigation and warning measures are required. A statement of findings has been developed to explain the rationale for retaining the structures in the floodplain (see appendix D). The development concept plans for Yosemite Valley, El Portal, and Wawona will contain detailed descriptions of the mitigation required for structures that are not removed from the floodplain.

Relocation of the Wawona post office, store, and gift shop will be explored in the development concept plan. Structures located in the 100-year floodplain at Wawona are not residential, so less stringent

mitigative measures would be required. The park has a flood plan that addresses warning and evacuation procedures.

Wetlands — Removal of structures from riverbanks in Yosemite Valley would be consistent with NPS policies and guidelines for implementing Executive Order 11990, "Protection of Wetlands." Removal would benefit areas that may be classified as wetlands. Structures that would be removed are 48 units at Housekeeping Camp and units in the floodplain at Yosemite Lodge. There would be no new adverse effects on wetlands under this alternative.

Water Quantity — The changes in the quantity of water used that would be attributable to concession operations were not specifically quantified in the 1980 EIS. The cumulative impact on the water quantity in the Merced River was described as a decrease of 500,000 gpd associated primarily with the reduction of development in Yosemite Valley and conversion to groundwater sources at El Portal. It is estimated that water use for all the valley concession lodging would decrease under this alternative by 23,000–35,000 gpd. Parkwide, water use would decrease by 21,000–31,000 gpd.

The 1980 EIS projected a cumulative effect on the South Fork of the Merced from an increase in diversion from 207,000 gpd to 275,000 gpd. The low flow volume for the river was estimated in the 1980 GMP to be 650,000 gpd (about 1 cfs), so that the proposed added diversion would increase the low flow diversion from 32% to 43%.

The increased diversion of 4,000–4,300 gpd to supply 41 new lodging units at Wawona would amount to less than 1% of the river volume at flows of 1 cfs and about one-tenth of 1% at flows of 6 cfs. It is estimated that the low flow period in Wawona would be about two weeks each

year during late summer. Demand would not exceed estimated supply at high and medium flows. The water conservation plan would go into effect sooner than without the additional use. Some method of water rationing, conservation, or storage would be considered during the development concept planning for Wawona.

The results of the USGS water study will provide information to determine whether there is sufficient water to make additional lodging at Wawona feasible. Should enough water be available so that additional lodging is feasible, an analysis of water rights will be needed to ensure that the National Park Service has a valid claim to the water.

In the 1980 EIS, a cumulative impact on the water quantity of the Tuolumne River was projected (White Wolf, Tuolumne Meadows, High Sierra camps, Hodgdon Meadow) in the form of a decrease from 164,000 gpd to 162,000 gpd. The diversion at Tuolumne Meadows accounts for about 2% of the total low flow drainage of the Tuolumne River above Hetch Hetchy Reservoir.

Water Quality — General impacts on water quality would include temporary effects from construction as well as impacts associated with visitor use. Construction results in temporary degradation of water quality by soil erosion and by subsequent runoff from disturbed areas before revegetation.

Turbidity associated with construction would be localized and of short duration, and no significant secondary effects on aquatic species would be expected. Foot traffic along streams would promote soil erosion into watercourses, contributing to turbidity of stream water. Stream turbidity would decrease from reduced rates of soil erosion in riparian areas after removal of

24 structures (48 units) at Housekeeping Camp that lie within 100 feet of the river.

Percolation rates would be reduced and surface water runoff increased on trampled soils; this would promote erosion. Minor increases in nutrient levels and contamination with fecal coliform organisms and other bacteria would result from bathing in streams and from normal drainage in high-use areas.

Soil compaction would occur in areas of concentrated foot traffic, resulting in accelerated surface water runoff with subsequent erosion following heavy rainfall. Bank trampling causes increases in stream width. In the Merced River in Yosemite Valley, an increase in stream width of up to two and a half times the original width has been documented. Related impacts of trampling include increasing water temperature due to reduction in vegetative cover and a decrease in dissolved oxygen.

At Tuolumne Meadows, the existing wastewater treatment system is used at design capacity of 100,000 gpd during peak weekend use. No major contamination of the Tuolumne River is occurring, and none would be expected under the actions of alternative A.

An increase in surface diversion of the South Fork of the Merced River at Wawona that results in flows of less than 6 (cfs) would potentially aggravate problems of water stagnation and lowered dissolved oxygen levels. The beneficial use of the river as wildlife habitat would be adversely affected by water stagnation and lowered dissolved oxygen levels.

As noted under "Water Quantity," the increased diversion of at most 4,300 gpd to supply 41 new units at Wawona would amount to less than 1% of the river volume at flows of 1 cfs and about one-tenth of one percent at flows of 6 cfs. It is un-

likely that such a change would significantly affect water quality.

Wild and Scenic River Values — Until the outstanding river values are defined, a full analysis of the impacts of the proposal on wild and scenic river values is impossible. No significant new development has been proposed under alternative A that would adversely affect river values within the corridor for any of the designated wild and scenic river segments affected by this alternative. Removal of 48 units at Housekeeping Camp that are within 100 feet of the river and of 117 units at Yosemite Lodge would enhance river values.

Air Quality. Air quality would be affected by vehicle exhaust emissions, combustion byproducts from facility heating plants, and campfires. Vehicle exhaust emissions would contribute various amounts of pollutants, including carbon monoxide, nitrogen oxides, hydrocarbons, lead, and suspended particulates. Wherever construction was taking place, construction vehicles would produce the same pollutants for the duration of the project.

Quantities of air pollutants could be expected to change with changes in transportation patterns. Such changes are currently unquantifiable, but this matter would be examined in a transportation study. Actual proportions of visitors who would use buses from outside the park are unknown, as are the projected miles associated with a future shuttle system.

The worst-case situation discussed in the 1980 EIS included a projection that 133,000 vehicle miles would be driven on a peak use day. Estimated exhaust emission rates from the draft proposal indicate that for this mileage, 10.64 tons of carbon monoxide, 0.67 tons of hydrocarbons, and 0.36 ton of nitrogen oxide would be produced. Improvements in air quality in Yosemite

Valley would be expected to result from an overall decrease in level of use.

Scenic Resources. Any alteration of the environment that improves or detracts from enjoyment of the park's outstanding natural scenery or the tranquility of the setting is assumed to be an impact on the park's aesthetic quality. Actions of this alternative would marginally reduce the extent of distractions in Yosemite Valley by removing some buildings, restoring natural vegetation patterns, and ensuring that new developments are located and designed to minimize their visibility.

In the 1980 EIS it is projected that effects on scenic resources would result from changes in concession operations as follows. (The 1980 document differentiated between three levels of scenic quality. These levels have been combined here.)

Removal of the Ahwahnee tennis courts would result in restoration of 1–2 acres of scenic area. Removal of Yosemite Village gift shops and services (gift, clothing, sport shop, beauty shop) and redesign of the village mall would result in a gain of 6.2 acres of scenic area. Removal of the Yosemite Valley garage and service station would result in a gain of 1.5 acres of scenic area. It is estimated that removal of the concession warehouse would result in a gain of 1.6 acres of scenic area. Removal of Degnan's would add 0.4 acre of scenic area.

At Housekeeping Camp, reduction of housekeeping units from 280 to 232 and redesign of the area would result in a gain of 2 acres of scenic area. Removal of tent-cabins at Curry Village from the rockfall zone would result in a gain of 4.2 acres of scenic area. Removal of the Curry Village ice rink would result in a gain of 1.7 acres of scenic area, but the gain would be lost in winter through installation of the temporary ice rink. Removal of 117 units at

Yosemite Lodge would result in a gain of about 10 acres of scenic area.

Effects on scenic quality in other areas of the park are described qualitatively rather than quantitatively in the 1980 EIS. The snack bar and gift shop at Glacier Point would be moved away from one of the most significant and well-known viewing points in the park. Removal of the gift shop at Mariposa Grove would improve the natural appearance of the area.

The natural, undisturbed appearance of portions of El Portal would be significantly altered by construction of a commercial facilities area for services (automobile service, restaurants, grocery store, clothing and gift shops, bank, beauty and barber shop) and for support facilities (maintenance, warehousing, laundry, bus servicing, and open-air storage). The proposed expansion of the lodge at White Wolf would slightly increase the developed appearance of the area.

At Tuolumne Meadows, relocation of the grocery store would increase the naturalness of an area visible from the road. Other developments that would detract from scenery would be located where they would not be visible from the road.

Wilderness. Alternative A would cause no new impacts on wilderness. Use at the High Sierra camps would be expected to remain at current levels, and no new development in that area would be planned under this alternative.

Impacts on Cultural Resources

Compliance with section 106 of the National Historic Preservation Act for proposed actions in the 1980 Yosemite GMP was accomplished through a memorandum of agreement between the National Park Service and the California state his-

toric preservation officer. The agreement was ratified by the Advisory Council on Historic Preservation on November 21, 1979. Information regarding specific actions may be found in the agreement and accompanying clarifying documentation.

The Park Service will comply with the National Historic Preservation Act of 1966, as amended, according to the stipulations found in the programmatic agreement of August 15, 1990, among the Advisory Council on Historic Preservation, the Council of State Historic Preservation Officers, and the National Park Service. The California state historic preservation officer and the Advisory Council on Historic Preservation have been notified regarding initiation of the planning process. The Park Service has consulted informally with the California state historic preservation office, and consultation will continue as appropriate.

Historic Resources. In the Yosemite Valley Historic District, the proposed removal of the tennis courts (1928) from the Ahwahnee Hotel grounds would alter the historic hotel setting but would not significantly affect the building's architectural qualities.

As specified in the 1979 memorandum of agreement with the California State Historic Preservation Office, the Park Service will consult with that office regarding redesign and new construction at Camp Curry. In the Camp Curry Historic District, the potential for changing Camp Curry's historically significant philosophy of low-cost accommodations would be satisfactorily avoided by maintaining a mixture of old and new tent-cabins. The original registration office, Mother Curry's bungalow, and the camp entrance sign would all be preserved and maintained. Design criteria accompanying the memorandum of agreement would be used in

new construction redesign and in alteration of existing facilities.

Proposals for the Wawona Hotel (in the Wawona Historic District) would result in partial restoration and increased use of the buildings. Relocation of the hotel parking area and redesign of the gas station facade would reduce modern intrusions on the historic scene.

Archeological Resources. Direct impacts on archeological resources would be variable and closely related to specific kinds of proposed actions. Construction activities would affect the uppermost strata because vehicles would compact the soils and alter distribution and stratification of artifacts. If all materials are on the surface, the site's value would be destroyed.

Excavation alters the position of artifacts at greater depth. Paving temporarily seals archeological resources and protects them from additional damage; however, construction activities that precede paving and the weight of paving materials alter the original site conditions. Removal of structures or roads from the tops of sites results in additional disturbance beyond the effects of original construction.

Until exact locations are selected and preliminary designs are available for new construction, it is not possible to project direct effects on archeological resources. Such effects would be avoided to the extent possible through consultation between designers and the park's archeology office. Should avoiding sites be impossible, mitigative measures, including excavation and recording of sites, would be carried out in consultation with the state historic preservation officer. Should previously unknown resources be uncovered during construction, work in the discovery area would be stopped, and consultation would be carried out according to 36 CFR 800.11.

Impacts on Local Economies

Implementation of the construction actions outlined in this alternative would generate employment and income in the five counties of the Yosemite Region (Madera, Mariposa, Merced, Mono, and Tuolumne). Minor population increases in the five counties could be expected from expanded employment opportunities. This would generate demand for housing, health care facilities, and social services. After completion of the various construction projects, employment opportunities in the region might decline. If this occurred, it would cause a consequential decrease in population and the demand on county infrastructure.

Unavoidable or Irretrievable Commitments of Resources

The unavoidable impacts on visitor use would be the loss of tennis opportunities in Yosemite Valley and the fact that a significant number of potential overnight visitors would find concession accommodations already filled to capacity during summer.

The primary unavoidable and irretrievable effect on vegetation would result from complete removal caused by construction of buildings. Impacts would be compounded by consequent increases in visitor use around these facilities, resulting in trampling, soil compaction, and root injury. Plant abundance and species composition also would change as a result of microclimatic variations, but the change would be small.

The primary unavoidable and irretrievable effects on wildlife, which includes all endangered, threatened, and sensitive animals listed by any government agency, would be local reductions in habitat and disturbance of less tolerant species. The

area potentially available to wildlife would be diminished; this could result in slight reductions in certain wildlife populations. The greatest impact would be loss of 10–13 acres of lodgepole pine community at Tuolumne Meadows. This would not significantly affect any wildlife populations because of the total area of lodgepole pine community available in the vicinity.

The primary unavoidable and irretrievable impact on water resources described in the 1980 EIS is degraded water quality from contaminants in storm water runoff in developed areas.

No unavoidable adverse impacts on air quality from the 1980 proposal were mentioned in the EIS, and none are anticipated now.

The major unavoidable and irretrievable impact on scenic quality would be the concessioner (and NPS) headquarters development at El Portal.

Cumulative Impacts

A total of 147 buildings would be removed from Yosemite Valley under the 1980 GMP proposal. Maintenance facilities in Yosemite Valley and El Portal, visitor services facilities at El Portal, a grocery store at Curry Village, and a horse campground at Tuolumne Meadows would slightly increase the amount of development. There would be a net reduction in the amount of concession development in Yosemite Valley.

Alteration of natural vegetation by trampling of the soils and vegetation and by soil compaction in areas of visitor use would continue. Removal or relocation of facilities would allow revegetation of some areas, but revegetation does not reproduce exactly the ecological processes

and components that existed before disturbance. The greatest loss would be 10–13 acres of lodgepole pine community at Tuolumne Meadows. With removal of additional vegetation for new construction, the overall amount of natural vegetation in the park would decrease. However, compared to the total acreage of natural vegetation that exists in the park, the amount lost to new construction would be negligible. The amount of vegetation that would be lost to new construction cannot be determined until preliminary designs are prepared.

The presence of structures in the floodplain would continue to alter natural hydrological processes that act on the Merced River in Yosemite Valley and the natural floodplain values. Removal of 24 structures at Housekeeping Camp that are within 100 feet of the Merced River and removal of the lodging in the floodplain at Yosemite Lodge would be beneficial to the natural floodplain values and would decrease risks to life and property. This action also would benefit wild and scenic river values. Visitors' use of the river would continue to alter the riverbank, with subsequent effects on the river.

Occupation and development of Yosemite results in long-term impacts on nesting birds, as is evident from comparison of old records and museum specimens with current lists. The old records and specimens can be used to document the loss of several species that used to breed regularly in Yosemite Valley, especially birds dependent on the river (harlequin ducks) and riparian vegetation (willow flycatcher). Great gray owls are probably less common at Badger Pass than in previous years, when they were able to hunt during mild winters at Monroe Meadows, now the downhill ski area.

Although the main cause for the decline of bird species is probably habitat loss, the

increase in edge habitat due to construction in formerly homogeneous habitats allows an increase in nest parasitism by brown-headed cowbirds and a subsequent decline in populations of parasitized species, generally vireos, warblers, sparrows, and other small songbirds. Although they were not recorded in Yosemite until 1934, brown-headed cowbirds are now a common species. Favored feeding areas include horse corrals, stables, campgrounds, and picnic areas. Retention of these facilities in Yosemite will continue to provide habitat for brown-headed cowbirds with continuing potential impacts on willow flycatchers.

Continued development on private land outside the park and land use practices such as grazing and logging on adjacent Forest Service lands will decrease suitable flycatcher habitat and increase habitat used by cowbirds. The U.S. Fish and Wildlife Service has recommended that the Yosemite resource management plan include a cowbird abatement program to reduce the impacts of cowbird parasitism on the nests of sensitive species such as the willow flycatcher and other species.

Removal of 24 Housekeeping Camp structures from the riverbank would increase habitat for the flycatcher if restoration of riparian vegetation as described in the resource management plan was successful. Meadow restoration in Yosemite Valley would benefit willow flycatchers by increasing available habitat.

Conservation of water and energy would be emphasized in all new construction and remodeling. This alternative would allow an opportunity to design energy-efficient facilities and reduce long-term energy and water consumption.

Water diversion from the South Fork of the Merced River at Wawona would be increased by up to 4,300 gpd to supply

new lodging units unless the park could develop groundwater from the area. The increased diversion would lower the dissolved oxygen content at very low flows. This would decrease the habitat suitability for the federal candidate Wawona riffle beetle, which prefers highly oxygenated water. The effects of the present level of water diversion on the riffle beetle is not known.

Although lodging would decrease from existing levels by 12.9% parkwide and by 17.4% in Yosemite Valley under this alternative, no controls would be placed on the method of transportation that visitors use to get to the park or on the number of day visitors beyond the carrying capacity established in the 1980 GMP. Without data on the method of transportation or an estimate of miles driven within the park by visitors staying at in-park lodging, it is not possible to quantify the effect of decreased lodging on air quality. Considering that park visitation shows an increasing trend, any benefit to air quality from reducing lodging would be counteracted by the adverse impact of increasing visitation.

Scenic quality in Yosemite would be improved through reduction of lodging units, redesign of lodging areas, and removal of structures. In Yosemite Valley, 265 lodging units would be removed. The overall decrease in lodging units parkwide would be 230 units. A total of 147 buildings would be removed from Yosemite Valley under this alternative.

The scenic quality at Tuolumne Meadows would be enhanced after restoration following removal of the concession stables from the meadow. After removal of the concession stables at White Wolf and restoration to meadow, the scenic quality of that area also would be enhanced. Relocation of the snack bar and gift shop away

from the main overlook at Glacier Point would benefit the scenic quality there.

The most significant cumulative impact on archeological resources would occur at El Portal. Proposed use of the developable land for administrative, warehousing, and maintenance facilities would affect archeological sites and the integrity of the archeological district.

ALTERNATIVE B: IMPLEMENT GMP CONCESSION ACTIONS WITH REVISIONS (FINAL PROPOSED ACTION)

Differences between the impacts of the draft proposal and this final proposed action have been noted. Most of the actions under the proposal would be the same as those under alternative A.

To address specific issues and environmental concerns for specific sites, impacts will be described in more detail in an individual development concept plan/environmental assessment or environmental impact statement to be prepared for each developed area. The plans will include estimates of acreages of disturbance and required site restoration and revegetation. It is not possible to describe exact impacts of the proposal, especially the acreage of disturbance, until a preliminary design is available for each developed area.

Impacts on Visitors' Use of Concession Facilities and Services

Greater reductions in lodging are proposed than under the 1980 GMP proposal. Available lodging in Yosemite Valley would decrease from the existing level by 310 rooms (20.3% reduction). Parkwide, lodging would decrease from 1,782 rooms in 1991 to 1,472 (17.4% reduction). The decrease in valley lodging under the draft proposal was the same as the final pro-

posal. Under the draft proposal, parkwide lodging would have decreased from 1,782 to 1,507 rooms (13.1% reduction).

Because of the reduction in overnight facilities, the number of people who would be able to stay overnight in the park would decline, causing some inconvenience and disappointment to people who want this experience. However, since 1980, more rooms have been built in communities adjacent to the park; this would mitigate some of the inconvenience.

Under this final proposal, there would be about 150 fewer lower-priced (economy and rustic) rooms parkwide than proposed in the 1980 GMP and about 450 fewer than at present. Under the draft proposal, the percentage of lower-priced rooms would have decreased from 79% to 52%. On the basis of public comments on the draft proposal, the number of lower-priced units that would be available has been increased to 65% in this final proposal.

This decrease could cause inconvenience and economic hardship for people wanting to occupy lower-priced units but unable obtain them. However, the lower-priced units are the least desired, based on the occupancy rates and the order in which they are filled. Thus, more visitors would be able to get better-quality rooms than before, which would increase visitor satisfaction.

Because most units would now contain baths, the large segment of visitors who want that feature would be better served. Consequently, the necessity and inconvenience of trying to upgrade accommodations during one's visit would be reduced. In addition, providing bathrooms in lodging units would increase visitor safety by eliminating the need to find outdoor facilities in unfamiliar terrain at night.

Visitor enjoyment and convenience would be enhanced through redesign of food services to increase efficiency, consolidation of food service functions within various locales, and a 4% increase in the number of food service seats now available park-wide (from 2,725 to 2,830). These actions would reduce confusion, waiting, or associated travel time needed to locate outlets.

Outside seating would benefit visitors with picnic lunches as well as those purchasing food from a concession operation. Under the draft proposal, the number of food service seats would have increased 8.6% (from 2,725 to 2,960). Because there would be fewer food service seats under the final proposal, visitor convenience would not be enhanced as much as under the draft proposal.

Relocation of major auto repair service would inconvenience visitors and residents who have become accustomed to having this service available in Yosemite Valley. Visitors and residents would have to drive or have their vehicles towed to El Portal for major repairs, which would increase traffic slightly on the El Portal road. Towed vehicles would constitute a temporary hazard on the narrow road.

Adaptive reuse of the Pohono Gift Shop, currently the art activity center, as a wilderness/backcountry permit center would create more room for general interpretation in the main Yosemite Valley visitor center. It also would enable park staff to concentrate on specific types of information in each place, and it would reduce crowding in the visitor center. The art activity center would be moved to the bank building. Retention of the art activity function would continue a popular activity that has minimal resource impacts.

Visitors' understanding and educational experience of the park would be enhanced by increased interpretive emphasis in

souvenir selection and by interpretation provided with recreational activities like horseback riding. The new concessioner would be strongly encouraged to provide interpretation in conjunction with visitor services.

The small percentage of visitors who enjoy tennis might be disappointed to find that activity eliminated from Yosemite Valley. Tennis would continue to be available at Wawona and at numerous resorts in the Sierra Nevada.

Retention of the Curry Village ice rink would continue a traditional activity enjoyed by many winter visitors.

The reduction and relocation of horseback trails in Yosemite Valley would reduce potential conflict with other users such as hikers, bikers, and campers. Removal of pony rides would disappoint some visitors but reduce adverse effects on meadows, riparian zones, and riverbanks caused by uncontrolled access by ponies.

In the draft proposal it was noted that relocation of the stables to the Curry dump site would eliminate existing impacts on nearby campers caused by undesirable odors and insect populations associated with stables. However, this impact is already being minimized by present stable management practices, and no additional adverse impact would be expected to result from the move to the new site.

Provision of showers in major campgrounds would enhance visitor convenience because having showers nearby would reduce the need to travel farther for shower facilities. Crowding and waiting at existing shower facilities would be reduced.

Expansion of the shuttle route or an increased number of shuttle stops would result in transport of more people to de-

sired destinations without the need for private autos or other means of individual access. This would increase visitor convenience and flexibility in enjoyment of park resources.

All actions under this proposal would comply with the provisions of the Americans With Disabilities Act. All new construction would be fully accessible. Existing facilities would be rehabilitated to comply with the provisions of the act.

Construction activities would cause inconvenience to visitors. Although construction would be scheduled to avoid the heaviest use times, some impact would be unavoidable because the time of year appropriate for construction is also the main season of visitation.

Impacts on Natural Environment

Vegetation. As in alternative A, most impacts on vegetation from the final proposal would be attributable to construction of proposed buildings and associated parking areas and roadways or to removal of such facilities and subsequent restoration of the vacated area. The direct effect of construction would be the removal of vegetation from the area to be occupied by the facility and trampling or cutting of vegetation in the surrounding area. Injury to trees and their roots (such as abrasions or cuts from construction equipment) could increase the chance of infection with root rot; such a tree could become a hazard tree. No new parking expressly for day-use visitors would be constructed under this proposal.

Some lodging units would be removed and replaced by new ones. Relocation of a building's functions involves new construction in some cases; in others, the functions would be moved to another building. In either case, relocation means

the existing structure would be demolished and the site restored.

Buildings whose functions would be relocated to another existing building are not included in the following discussion of new construction because relocation of functions to an existing building results in no net disturbance or restoration. Although acreage affected by actions of the proposal will not be known until development concept plans are completed, the numbers of buildings to be removed or built are included to give some indication of the potential effects by listing proposed construction or demolition.

Buildings or facilities that would be removed under the proposal are the Ahwahnee tennis courts; the Yosemite Valley garage and village service station (now used as a photo shop); the main concessioner's headquarters; 89 cabins without baths and 40 cabin units at Yosemite Lodge; 24 additional structures (48 lodging units) at Housekeeping Camp (20 units removed in 1990); and 80 cabins without baths and 276 tent-cabins at Curry Village. In all, about 477 structures would be removed from Yosemite Valley. The Glacier Point gift shop and the White Wolf stables also would be removed.

With the construction of replacement lodging described below, there would be a net decrease of 254 structures in the valley. Building materials from removed structures would be salvaged by the contractor or disposed of outside the park. Changes in the numbers of Yosemite Lodge and Curry Village lodging to be removed are shown in table 3, in the "Alternatives" chapter.

Under the draft proposal, about 596 structures would have been removed from the valley. With lodging replacement, the draft proposal would have resulted in a net decrease of 396 buildings in the valley.

Each Housekeeping Camp unit was mistakenly counted as a separate structure in the draft proposal, but in fact each single Housekeeping Camp structure contains two units.

The Curry Village ice rink would have been removed under the draft proposal.

New construction would be required for about 134 cottage and cabin units at Yosemite Lodge (60 units would be replacements of existing cabins); 149 cabin units at Curry Village, construction of a new permanent ice rink at Curry Village, and addition of a restaurant at Wawona. It is projected that the construction would occur in existing disturbed areas with a result of no new disturbance. The draft proposal called for new construction of 155 motel units and 50 replacement cabins at Yosemite Lodge, 144 cabin units at Curry Village, and an additional 41 rooms at the Wawona Hotel.

Buildings or facilities whose functions would be relocated into new construction are the concession fire station (to be moved to another location in Yosemite Village), the Yosemite Valley concession stables (from the river bottom to the old Curry dump site), the snack bar at Glacier Point (back from the main overlook to the parking area; the gift shop would be discontinued), the White Wolf restaurant (to a site near the existing building), the Tuolumne Meadows dining room (away from river), the store and grill at Tuolumne (to a new store near the existing gas station), and the Tuolumne concession stables (to lodgepole pine community). Under the draft proposal, the White Wolf stables would have been relocated, but under this final proposal the stable activity at White Wolf would be discontinued.

Without a preliminary design, accurate quantification of the effects on vegetation from these actions is not possible, but

some qualitative impacts can be anticipated. Roads and utilities (infrastructure) are already in place to all concession developments, so major impacts will not result from placement of infrastructure. Most ground disturbance would involve removal of existing lodging and its replacement in more or less the same location (except for units that would be removed from the floodplain or rockfall zones in Yosemite Valley), so that new disturbance would be minimized.

Many actions would not involve ground disturbance because they would only entail switching functions within an existing building. New construction, including relocations, at Tuolumne Meadows (store, dining room, concession stables) would be in the lodgepole pine community, so that new impacts on the meadow and riparian areas could be avoided and existing disturbed areas restored to the extent possible. The new restaurant at White Wolf would be located in lodgepole pine forest.

It is possible that not all construction could take advantage of previously disturbed areas, in which case mature trees would be removed. Relocation of the Yosemite Valley concession stables to the old Curry dump also might involve removal of some trees, even though most of the site obviously has been disturbed previously.

The concession fire station would be relocated to an existing disturbed area, so there would be no net disturbance. The Yosemite Valley concession stables occupy about 7 acres, which is a reasonable estimate for the new stables. Because the new stables would occupy the old Curry dump site, new disturbance would be minimal.

It is estimated that relocation of the Glacier Point snack bar would require about 1 acre of disturbance adjacent to the parking area. The amount of disturbance at

Glacier Point under the final proposal would be slightly less than under the draft proposal because the final proposal calls for the gift shop function at Glacier Point to be discontinued.

If the concession stables were replaced at an equivalent size, it is estimated that approximately 10–13 acres of lodgepole pine forest would be disturbed for construction of the Tuolumne Meadows stables. Disturbance of lodgepole pine community would be 2–3 acres less under the final proposal because the White Wolf stables would be discontinued.

Establishment of a commercial facilities area at El Portal would be considered in the development concept plan. Such an area would be used for visitor services, concession maintenance, warehousing, laundry, bus servicing, and open-air storage. Acreage disturbed cannot be estimated until a preliminary design is prepared.

After construction, all disturbed ground would be revegetated, landscaped, or restored to as natural a condition as possible. Sites that would be restored are the existing concession stables in Yosemite Valley (mixed conifer/riparian) and Tuolumne Meadows (meadow), the snack bar and gift shop site at Glacier Point (red fir), the stables at White Wolf (meadow), the Ahwahnee tennis courts (meadow/black oak woodland), and riparian areas at Housekeeping Camp, Yosemite Lodge, and the Tuolumne Meadows site now occupied by the dining room.

It is estimated that the acreage of restored area would be 5 acres of mixed conifer/riparian area at Yosemite Lodge, 10–12 acres of mixed conifer/riparian area at the Yosemite Valley concession stable site, 1–2 acres of meadow/black oak woodland at the Ahwahnee tennis court site, 2 acres of riparian area at Housekeeping Camp, 2 acres of meadow at the White Wolf con-

cession stable site, 15 acres of meadow at the Tuolumne Meadows concession stable site (includes removal of a road), and 1 acre of riparian area at the Tuolumne Meadow dining room site.

Although the Glacier Point site is located in the red fir community, the site itself is primarily a granite substrate with scattered shrubs. It is estimated that restoration would involve less than 1 acre of actual building disturbance.

About 1.7 acres less of meadow would be restored under this final proposal than under the draft proposal because the ice rink would not be removed, as called for in the draft proposal. Restoration would not be successful unless visitor foot traffic was managed. Foot traffic to and around buildings would trample herbaceous vegetation and tree seedlings.

The use for the garage site is still undetermined. If the development concept plan for Yosemite Valley determines that the site is not required for use as part of the visitor circulation area in the redesigned village, the site would be landscaped as appropriate for the heavily used village area. The garage site, approximately 1.3 acres, is located in meadow and black oak woodland communities.

The soils at the site of the garage and former service station would be tested for the presence of any hazardous materials. If contamination of soils was found, clean-up and any required mitigation would proceed according to all applicable federal, state and county regulations.

Indirect effects on vegetation would result from an increase in foot traffic around structures and changes in the natural fire regime. Foot traffic to and around buildings would trample herbaceous vegetation and tree seedlings. Prescribed fire would

continue to be restricted in the more highly developed east end of Yosemite Valley.

An altered fire regime results in changing species composition as meadows are invaded by mixed conifer vegetation. It also contributes to an increased incidence of plant disease in the forest as it becomes unnaturally dense. The Yosemite fire management plan proposes supplementary fuel management practices to mitigate adverse impacts of past fire management practices.

It is anticipated that non-summer visitation would increase slightly because there would be more all-season lodging available. The slight increase would not be expected to have significant adverse impacts on vegetation because of the overall decrease in available lodging. There would be fewer impacts under the final proposal than under either alternative A or the draft proposal because there would be a greater decrease in available lodging under the final proposal.

Although there would be no significant proposal-related effects on vegetation during the non-summer months, the gradual increase in overall visitation would potentially affect vegetation. Most vegetation is dormant in winter and would not be significantly affected by slight increases in visitation anticipated for this season.

The impacts of increased visitation on Yosemite Valley vegetation in spring, when the ground is wet, would be mitigated by ongoing resource management programs such as closing and rehabilitating old meadow trails, restricting random foot traffic in meadows, closing sensitive areas, placing boardwalks through sensitive meadow areas, revegetation programs, and the Merced River restoration effort.

Threatened, Endangered, and Sensitive Species. No state or federally listed

threatened or endangered plant or animal species would be directly affected by any of the proposals. Indirect effects due to habitat loss would be expected to be minor and without long-term adverse effects on the survival of the species in the park.

Retention of the stables in Yosemite Valley and Tuolumne Meadows will continue to provide habitat for the brown-headed cowbird, which is a nest parasite on the state-listed endangered willow flycatcher. Removal of the White Wolf stables would decrease cowbird habitat, resulting in an anticipated but unmeasurable benefit to the flycatcher. Because of the continuing presence of a campground at White Wolf, cowbird habitat would continue to be present, so the benefit to willow flycatchers from stable removal would be small.

The Crane Flat area is used as a winter play area. The gas station and store are currently used in spring, summer, and fall. The area is a nesting and summering area for great gray owls, which arrive in spring. Continued use of this area for winter play, as proposed, might result in increased winter use, but this increase would not be expected to be significant. Winterizing would be accomplished by switching from electric generators to power lines. A separate environmental analysis would be completed before installation of the power lines. The resulting year-round reduction in noise levels would benefit the owls.

Some locations near the closure gate are used by skiers seeking higher elevations for skiing along the Tioga Road. Skiers typically do not use the area near the meadow during the great gray owls' nesting period because of inconsistent snow cover. Some park visitors come to the meadow during this time to observe the owls. Therefore, during the nesting period, parking would be limited to locations near the closure gate; the area near the

ENVIRONMENTAL CONSEQUENCES

Crane Flat meadow would be closed to parking. The meadow would be closed to visitors if monitoring or research demonstrated the need for closure.

The slight increase in restaurant seating at Tuolumne Meadows would slightly increase traffic and visitation to that area, although the majority of restaurant patrons would be expected to be people already staying in the area. If traffic increased significantly, sensitive species such as the Pacific fisher, the wolverine, and the Sierra Nevada snowshoe hare would avoid those areas to a greater degree than previously. Since sightings of these animals are extremely rare, it is not possible to assess the change in degree of avoidance.

No significant impact would be expected to result from the small increase in concession development at Tuolumne Meadows. The Yosemite natural resources management plan will address measures to protect and, where possible, enhance the populations of threatened, endangered, and sensitive species.

The federal candidate Wawona riffle beetle prefers highly oxygenated water. New effects on the beetle would be avoided because new rooms with baths would not be constructed at Wawona, so that additional water diversion from the river would not be required. Under the draft proposal, 41 more rooms with baths would have been constructed at Wawona, for which an estimated total of as much as 4,300 additional gpd of water would have had to be diverted from the river. This would have had a potential for lowering the dissolved oxygen content of the remaining flow. The final proposal does not include construction of additional rooms.

The addition of 60 restaurant seats would require approximately 600 more gpd of water than at present, which amounts to

less than one-tenth of 1% of the extreme low flow of the river. That increase in water diversion would have no significant impact on the beetle.

There is a potential that construction could require removal of black oak in Yosemite Valley or at Wawona. Removal of black oak, especially mature trees, would be avoided to the extent possible, particularly in Yosemite Valley. Consultation among park staff, designers, and construction personnel would be necessary to ensure that black oak would be removed only when unavoidable. Black oak seedlings and saplings that had to be removed would be salvaged for use in revegetation.

Water Resources. Effects on the park's water resources from the proposal are discussed in this section.

Floodplains — Structures to be removed from the 100-year floodplain in Yosemite Valley are 24 structures (48 units) at Housekeeping Camp, at least 39 and as many as 42 cabins with baths at Yosemite Lodge (the number depends on where the boundary of the floodplain is), and the Yosemite Valley concession stables. Removal of structures would be beneficial to the floodplain because it would reduce risk to life and property and make possible the restoration of natural floodplain values.

Six of the Ahwahnee cottages, all remaining structures at Housekeeping Camp, and the Wawona post office, store, and gift shop would remain in the floodplain, as proposed in the 1980 GMP. Under the draft proposal, Pine Lodge would have been removed from the floodplain.

Public comment on the draft *Concession Services Plan/Environmental Impact Statement* indicated that substantial reductions

in the number of low-cost accommodations, such as Housekeeping Camp and Pine Lodge, were not acceptable. On the basis of those comments, this final proposal calls for Pine Lodge to be retained. Effects on natural floodplain values would continue. Potential adverse effects on life and property would be mitigated by structural protection of the building. Non-structural mitigation would include warnings of the flood danger. An evacuation plan is already in place.

Removal of structures from the 100-year floodplain would be consistent with NPS policy as described in NPS guidelines for implementing Executive Order 11988, "Floodplain Management." Those guidelines require that residential structures be located out of the 100-year floodplain to minimize harm to life, property, and natural floodplain values. In cases where feasible alternative sites are not available out of the floodplain, mitigation and warning measures are required.

There are no feasible alternative nonfloodplain sites for the Ahwahnee cottages, Housekeeping Camp, and Pine Lodge at Yosemite Lodge because suitable space is lacking in Yosemite Valley. Creating new disturbance in the valley to relocate lodging structures is not acceptable.

A statement of findings explaining the proposed mitigation and the rationale for retaining the structures in the floodplain appears as appendix D to this document. The development concept plans for Yosemite Valley and Wawona will describe in greater detail the mitigation required for structures that are not removed from the floodplain. In the Wawona development concept plan, nonfloodplain sites will be considered for the relocation of the post office, store, and gift shop. Structures located within the 100-year floodplain at Wawona are not residential, so less stringent mitigative measures would be re-

quired. The park has an approved flood plan that addresses procedures for warnings and evacuations.

Wetlands — Removal of structures from the riverbanks in Yosemite Valley and Tuolumne Meadows would benefit areas that may be classified as wetlands. Structures that would be removed are 24 buildings (48 units) at Housekeeping Camp, structures in the floodplain at Yosemite Lodge, and the Tuolumne Meadows dining room. There would be no new adverse effects on wetlands under this alternative.

Water Quantity — The addition of showers to the Yosemite Valley campgrounds and the addition of private baths in valley lodging units would increase water usage. However, the 20.5% decrease in lodging would result in a decrease in water usage. A typical shower takes about 12 gallons of water. If 500 visitors showered (both those in the campgrounds and those in concession lodgings without baths), 6,000 gpd would be required. Water use in concession lodging in Yosemite Valley would be expected to decrease by 20,600–42,000 gpd under the final proposal (see appendix C for calculations). With the addition of showers and reductions in lodging, there would be a net decrease in water use of 14,600–36,000 gpd.

The 1980 GMP called for an increase in the number of rooms with baths at Wawona, and under the draft proposal, 41 rooms with baths would have been added. However, on the basis of comments on the draft plan, the Park Service has revised the proposal so that under this final proposal, no additional rooms with baths would be constructed at Wawona. Increasing the present number by 41 rooms with bath at Wawona would have increased water usage by about 3,400–4,300 gpd. Impacts associated with this increase are discussed under alternative A. Under this

final proposal, water use by concession lodging at Wawona would remain at existing levels, which are estimated to be between 8,000 and 10,500 gpd.

It is estimated that the addition of 60 restaurant seats at Wawona would increase water usage by about 600 gpd. This amount of additional usage would not be significant, even at very low flows. It is estimated that the extreme low flow period (less than 6 cfs) in Wawona would be about two weeks annually during late summer. Demand would not exceed estimated supply at high and medium flows. Even though the proposal would not significantly increase water diversion from the South Fork of the Merced, some method of water rationing, conservation, or storage would be considered during development concept planning for Wawona.

Under this final proposal, parkwide water usage would decrease 23,000–42,800 gpd. Under the draft proposal, parkwide water usage would have decreased about the same amount, 25,000–42,700 gpd.

Water Quality — The underground storage tanks formerly used for gasoline at the old service station (now used as a photo shop) would be removed along with the building. The Yosemite Lodge service station would comply with current EPA regulations concerning underground storage tanks.

Soils at the Yosemite Valley garage need to be investigated for the possible presence of contamination by hazardous materials, chiefly petrochemicals. If contaminated soils were present after removal of the building, the contamination could seep into groundwater and eventually enter the Merced River. If hazardous materials were found, removal would proceed in accordance with all applicable county, state, and federal regulations.

After relocation of the Yosemite Valley concession stables to the old Curry dump site, drainage from the relocated stables would be controlled so that water quality in the Merced River would not be affected. Use of the dump site would be contingent on approval by health authorities following examination to determine if any hazardous materials were among the buried trash. If hazardous materials were found, removal would proceed in accordance with all applicable county, state, and federal regulations. Even if no hazardous materials were present, garbage at the site might need to be excavated and removed from the site before construction to ensure that building foundations would not be affected by soil conditions such as settling and compaction.

Bank trampling causes increases in stream width. In the Merced River in Yosemite Valley, an increase in stream width of up to two and a half times the original width has been documented. Impacts related to trampling include increasing water temperature due to reduction in vegetative cover and a decrease in dissolved oxygen.

Stream turbidity would decrease from reduced rates of soil erosion in riparian areas after removal of 48 Housekeeping Camp units (24 structures) that lie within 100 feet of the river.

As mentioned in the "Water Quantity" section, the Park Service has revised the proposal after receiving public comments so that the present number of rooms with baths at Wawona would be retained. No additional water diversion would be required to supply rooms with water. An increase in surface diversion of the South Fork of the Merced River at Wawona that resulted in very low flows would potentially aggravate problems of water stagnation and lowered dissolved oxygen levels.

Wild and Scenic River Values — Until the outstanding river values are defined, a full analysis of the effects of the proposed action on river values will not be possible.

Removal of structures adjacent to rivers (48 units contained in 24 structures within 100 feet of the river at Housekeeping Camp in Yosemite Valley, the Yosemite Lodge cabins that are within the 100-year floodplain, the Yosemite Valley concession stables, the Tuolumne Meadows dining room) would enhance river values. This alternative would have a greater positive effect on river values than alternative A, in which the stables and dining room would remain in the river corridor.

The draft proposal called for removal of Pine Lodge and replacement of the lost rooms with other units at Yosemite Lodge. Under this final proposal, Pine Lodge would be retained. Its retention would not degrade the qualities that make the Merced eligible for status as a wild and scenic river.

There would be a net decrease of 55 lodging units at Yosemite Lodge. The area would be redesigned. Design and landscaping would be coordinated with planning and resource management staff so that it would be consistent with the non-degradation and enhancement policy that governs management of wild and scenic rivers.

Whether or not concession raft rentals would be continued would be determined after completion of the *Merced River Restoration Plan*. At rafting put-in and takeout points, streamside riparian vegetation is trampled, which leads to compaction of the riverbank.

Air Quality. As under Alternative A, air quality would be affected by vehicle exhaust emissions, by combustion byproducts from facility heating plants and com-

mercial operations, and by wood combustion from fireplaces and campfires. Exhaust emissions from vehicles, including construction vehicles, would contribute various amounts of pollutants, including carbon monoxide, nitrogen oxides, hydrocarbons, lead, and suspended particulates.

Quantities of air pollutants would change with changes in transportation patterns (such as an increase in bicycle use or a decrease in vehicle miles driven). Such changes have not been quantified; this matter will be examined in a transportation study, which also will address the relative impacts that private vehicles and buses have on air quality.

Concession activities in the proposal that are related to visitor transportation include expansion and improvement of the Yosemite Valley shuttle bus system and reduction in the number of lodging units in Yosemite Valley. The proportion of vehicle-produced air pollutants attributable to visitors using concession facilities cannot be separated at this time from pollutants attributable to visitors in general or to pollutants transported into the park from nearby sources. Outside sources of pollutants include industrial, commercial, and residential sources in the central Yosemite Valley.

The decrease in number of lodging units would not be expected to affect air pollution levels significantly in Yosemite Valley because the magnitude of the change would not be large compared to other activities that result in air pollution (day use vehicle emissions, campfires, fireplaces).

Air quality would be slightly improved under this final proposal by a reduction in the number of trails open to horse use. Horse use would be limited to trails in the eastern end of the valley south of the river. Decreased horse use would result in

less dust and eliminate the need for the use of dust palliatives.

Scenic Resources. Removal of the gift shop and relocation of the snack shop away from the Glacier Point overlook would remove an unnatural feature from a spectacular natural viewpoint. Relocation of the concession stables and other facilities at Tuolumne Meadows into the lodgepole pine community would reduce the visibility of the stables and afford an opportunity for restoration of the meadow. Removal of the White Wolf concession stables would increase the area's scenic quality.

The aesthetic quality of Yosemite Valley would be improved by removal of 300 tent-cabins and maintenance facilities from areas of concentrated visitor use. Redesign of some crowded lodging areas such as Yosemite Lodge and Curry Village (after reduction of the number of lodging units) would improve the appearance of those areas. Removal of 207 lodging units from Curry Village would make it possible to redesign and landscape that area or to restore it to more natural conditions, which would improve scenic quality. Repainting the roof of the Yosemite Village warehouse building to blend in with adjacent vegetation would reduce the impact of this building when seen from overlooks.

Relocation of the Yosemite Valley concession stables to the Curry dump site would make them visible from Glacier Point, although not from the main overlook. The impact on the scenic view would be reduced by landscaping and use of a nonglaring roof that would blend in with the surrounding vegetation. For all Yosemite Valley buildings that are visible from overlooks (Yosemite Falls trail, Glacier Point), nonglaring roof materials would be used, or roofs would be painted to blend in with surrounding vegetation.

Removal of buildings would afford an opportunity for restoration of Yosemite Valley to more natural condition. Restoration of meadows would restore one of the area's most scenic elements.

Wilderness. There would be no new impacts on wilderness under this final proposal. Use at the High Sierra camps would be expected to remain at current levels, and no new development is proposed under this alternative.

Impacts on Cultural Resources

Accomplishment of compliance with section 106 of the National Historic Preservation Act in 1979 is detailed under alternative A.

Historic Resources. Management of the Curry Village Historic District under the final proposal would differ from that of alternative A. Tent-cabins would be reduced in number and spaced or clustered farther apart. All cabins without baths would be removed and new cabins would be built to replace those at Curry Village and elsewhere in Yosemite Valley.

Accommodations at Camp Curry—tent cabins, cabins without baths, and other cabins—are, according to the National Register nomination form, "exemplary of the Camp Curry ideal and enhance the historic setting, but their significance is minimal and exists only in a collective sense." In accordance with the November 21, 1979, memorandum of agreement, the National Park Service would update the 1984 design criteria for Camp Curry to ensure compatibility with the historic features and the camp setting. Any proposals involving removal, redesign, and new construction would follow a specific site plan that would be submitted to the state historic preservation office for review and comment before implementation.

The historic furnishings of the Ahwahnee Hotel would be inventoried and their preservation and maintenance ensured through consultation between the National Park Service and the concessioner.

The Wawona Hotel complex would retain its historic character. The draft proposal included the addition of rooms, but under this final proposal no rooms would be added. The new coffee shop would be separate from the hotel complex. The Park Service has initially applied the criteria of effect of 36 CFR 800.5 and has determined that these actions would have no adverse effect on the characteristics that make the Wawona Hotel complex eligible for the National Register of Historic Places.

In accordance with the November 21, 1979, memorandum of agreement, the National Park Service would consult with the California state historic preservation office on specific site plans for modification of the White Wolf dining/registration facility to ensure that the plans were compatible with the historic character. A new restaurant would be built that would be compatible with existing historic features.

For Tuolumne Meadows, a general store would be constructed as detailed elsewhere in this document. The National Park Service would prepare design criteria to ensure that new construction would be compatible with existing historic facilities.

Archeological Resources. Archeological surveys have been completed of all the developed areas in the park that contain concession facilities. Archeological districts listed on the National Register of Historic Places in Yosemite Valley, Wawona, El Portal, Crane Flat, White Wolf, and Tuolumne Meadows contain a total of more than 800 archeological sites. None of the actions of this final proposal would be expected to affect archeological resources in the districts.

Every effort would be made to avoid adverse effects on sites that may be located near concession facilities. If, during the design of a specific action, it became obvious that it would be impossible to avoid affecting a site, mitigative measures would be developed in consultation with the California state historic preservation officer, pursuant to the memorandum of agreement of November 1, 1979, among the state historic preservation officer, the National Park Service, and the Advisory Council on Historic Preservation. Should previously unknown resources be uncovered during construction, work would be stopped in the discovery area, and the National Park Service would consult according to 36 CFR 800.11.

Impacts on Local Economies

Proposed construction would generate employment and income for counties in the Yosemite region. Specific employment levels and cost estimates will be determined in the next several years during the design process.

There would be approximately 200 more rooms with baths under the proposal than the present number or that were proposed in the GMP. During winter approximately 90 more units would be available than the number commonly used now. The increase, which would occur over several years, would add some competition to lodging outside the park during winter. However, the increasing demand for rooms during winter would be expected to offset this increase.

The expected gradual reduction in rooms over a period of years suggests that this reduction would not dramatically affect development outside the park. About 1,300 lodging rooms and associated services have been developed for park visitors since 1980 at sites near the park. As in the

past, such development probably would occur irrespective of park development because of the increasing demand for lodging throughout the region.

Unavoidable or Irretrievable Commitments of Resources

The amount of naturally occurring vegetation that would be removed is unknown at this time, but removal of vegetation, particularly mature trees, represents an unavoidable alteration of the resources. The overall loss would be small compared to the park's entire area.

The unavoidable effects on visitor use from this proposal would be loss of tennis opportunities in Yosemite Valley and the fact that a significant number of potential overnight visitors would find concession accommodations already filled to capacity during summer.

The primary unavoidable effects on wildlife, which includes all endangered, threatened, and sensitive animals listed by any government agency, would be local reductions in habitat and disturbance of less tolerant species. The area potentially available to wildlife would be diminished; this could result in slight reductions in certain wildlife populations.

The primary unavoidable impact on water resources would be degradation of water quality by contaminants in storm water runoff in developed areas.

No unavoidable adverse impacts on air quality would be expected as a result of this proposal.

Cumulative Impacts

A total of 477 structures would be removed from Yosemite Valley. A total of

223 new lodging units would be built in Yosemite Valley, so the net reduction of structures would be 254. The removal of buildings in Yosemite Valley would represent a significant step in reducing the total building footprint. The net reduction in development would be greater than under the 1980 GMP proposal, in which 148 buildings would be removed.

New construction would be required for a restaurant at Wawona and for concession headquarters outside Yosemite Valley.

Alteration of natural vegetation by trampling of the soils and vegetation and by soil compaction in areas of visitor use would continue. Removal or relocation of facilities would allow revegetation of some areas, but revegetation does not exactly reproduce the ecological processes and components that existed before disturbance. As additional vegetation is removed for new construction, the overall amount of natural vegetation in the park decreases. Compared to the total acreage of natural vegetation that exists in the park, the amount lost to new construction would be negligible.

The amount of vegetation that would be lost to new construction cannot be estimated accurately until preliminary designs are prepared. The largest loss of vegetation would be at least 15 acres in the lodgepole pine community for relocation of the Tuolumne Meadows store, dining room, and stables. However, these structures would be removed from more sensitive meadow and riparian areas.

The presence of structures in the floodplain would continue to alter natural hydrological processes that act on the Merced River in Yosemite Valley and the natural floodplain values. Removal of structures from the floodplain would benefit natural floodplain values and decrease risks to life and property.

Visitors' use of the river would continue to alter the riverbank, with subsequent effects on the river. The wild and scenic river segment of the Merced River in Yosemite Valley would benefit from removal of Yosemite Lodge units in the floodplain, the Housekeeping Camp units within 100 feet of the river, and the concession stables. Removal of the Tuolumne Meadows dining room would benefit river values on the Tuolumne wild and scenic segment.

Long-term impacts on nesting birds are evident from comparison of old records and museum specimens with current lists. The former can be used to document the loss of several species that use to breed regularly in Yosemite Valley, especially birds that are dependent on the river (harlequin ducks) and riparian vegetation (willow flycatcher). Great gray owls are probably less common at Badger Pass than in previous years when they were able to hunt during mild winters at Monroe Meadow, now the downhill ski area.

Although the primary cause for decline of bird species is probably habitat loss, the increase in edge habitat due to construction in formerly homogeneous habitats allows an increase in nest parasitism by brown-headed cowbirds and a subsequent decline in populations of parasitized species—generally vireos, warblers, sparrows, and other small songbirds.

Although they were not recorded in Yosemite until 1934, brown-headed cowbirds are now a common species. Favored feeding areas include horse corrals, stables, campgrounds, and picnic areas. Retention of these facilities in Yosemite will continue to provide habitat for brown-headed cowbirds, with continuing potential impacts on willow flycatchers. Continued development outside the park and land use practices such as grazing and logging on adjacent Forest Service lands will de-

crease suitable flycatcher habitat and increase habitat used by cowbirds.

The U.S. Fish and Wildlife Service has recommended that the *Yosemite Resource Management Plan* include a cowbird abatement program to reduce the impacts of cowbird nest parasitism on sensitive species such as the willow flycatcher and on other species.

Removal of 24 Housekeeping Camp structures from the riverbank would increase habitat for the flycatcher if restoration of riparian vegetation (as described in the resource management plan) was successful. Meadow restoration in Yosemite Valley would benefit willow flycatchers by increasing available habitat. This final proposal would benefit willow flycatchers to a slightly greater degree than the 1980 GMP alternative because this proposal includes removal of White Wolf stables, which would reduce the amount of preferred cowbird habitat.

Water and energy conservation would be emphasized in all new construction and remodeling. This alternative would afford an opportunity to design energy-efficient facilities and effect long-term reductions in energy and water consumption. Water conservation measures such as toilets using less than 1.6 gallons per flush and water-conserving shower heads, which are being considered for installation into new and remodeled lodging units, would decrease water use from the amounts given here. The concessioner will be required to meet or exceed California energy conservation requirements.

Air quality would not change significantly as a result of the proposal. Although lodging both parkwide and in Yosemite Valley would decrease under this alternative, no controls would be placed on the method of transportation visitors use to get to the park or on the number of day-use visitors,

provided the carrying capacity established in the 1980 GMP was not exceeded.

Without data on the method of transportation or an estimate of miles driven in the park by visitors staying in park lodging, it is not possible to quantify the effect of decreased lodging on air quality. Considering that park visitation is increasing, any benefit to air quality from lodging reductions might be counteracted by the adverse effect of vehicle emissions resulting from increasing visitation.

The park's scenic quality would be improved through reduction of lodging units, redesign of lodging areas, and removal of other structures from Yosemite Valley. This alternative would have a greater beneficial effect on scenic quality in Yosemite Valley than alternative A because 290 structures would be removed

versus 148 in alternative A. The reduction in lodging units in Yosemite Valley under this alternative would be 310 units versus 265 in alternative A. The overall decrease in lodging units parkwide under this alternative would be 310 units versus 230 in alternative A.

At Tuolumne Meadows, removal of the dining room from the area near the river and removal of the concession stables from the meadow would enhance the scenic quality of those sites following restoration to meadow and riparian area. Scenic quality at White Wolf would be enhanced after removal of the concession stables and restoration of meadow. The scenic quality at Glacier Point would benefit from relocation of the snack bar away from the main overlook. In areas where new facilities would be built, the scenic quality would deteriorate.

TABLE 6: COMPARISON OF ENVIRONMENTAL CONSEQUENCES

Resource Affected	Alternative A (1980 GMP Proposal)	Alternative B (Final Proposal)
<u>Visitors' Use of Concession Facilities</u> (alternatives compared to 1991 figures)	<p>Decrease in Yosemite Valley lodging from 1,525 to 1,260 units (17.4%).</p> <p>Decrease in parkwide lodging from 1,782 to 1,552 units (12.9%).</p> <p>Decrease in Yosemite Valley food service seating from 2,385 to 1,620 seats (32%).</p> <p>Decrease in parkwide food service seating from 2,725 to 1,910 seats (29.9%).</p> <p>Tennis no longer available in Yosemite Valley.</p> <p>Permanent Curry Village ice rink removed and replaced seasonally with a portable rink.</p> <p>Winter play area developed at Crane Flat.</p> <p>Large conventions restricted to off-season with resulting decline in frequency.</p>	<p>Decrease in Yosemite Valley lodging from 1,525 to 1,215 units (20.3%).</p> <p>Decrease in parkwide lodging from 1,782 to 1,472 units (17.4%).</p> <p>Increase in Yosemite Valley food service seating from 2,385 to 2,440 (2%).</p> <p>Increase in parkwide food service seating from 2,725 to 2,830 seats (3.9%).</p> <p>Same as alternative A.</p> <p>Curry Village ice rink retained; area used for bike rentals in summer.</p> <p>Same as alternative A.</p> <p>Same as alternative A.</p>
<u>Natural Environment</u> <u>Vegetation (removed)</u>	<p>Vegetation removed from undisturbed areas for construction of buildings, associated roads, and parking; exact acreage not known until preliminary design is prepared; acreage estimates given are based on size of existing facilities:</p> <p>Tuolumne Meadows horse campground (no acreage estimate of lodgepole pine forest disturbed).</p> <p>Tuolumne Meadows stables (10-12 acres of lodgepole pine forest).</p> <p>Glacier Point snack bar and gift shop (1 acre of shrubs in red fir community).</p> <p>White Wolf stables (2-3 acres of lodgepole pine forest).</p> <p>Commercial visitor services area and concession maintenance facilities at El Portal (no acreage estimate of oak woodland/chaparral disturbed).</p>	<p>Vegetation removed from undisturbed areas for construction of buildings, associated roads, and parking; exact acreage not known until preliminary design is prepared:</p> <p>No horse campgrounds would be constructed.</p> <p>Same as alternative A.</p> <p>Glacier Point snack bar relocated (1 acre of shrubs in red fir community) consistent with GMP; gift shop removed.</p> <p>No replacement stables would be constructed.</p> <p>Same as alternative A, pending the El Portal development concept plan.</p>

Resource Affected	Alternative A (1980 GMP Proposal)	Alternative B (Final Proposal)
<u>Natural Environment (continued)</u>		
<u>Vegetation (restored after removal)</u>	Vegetation restored after removal or relocation of structures:	Vegetation restored after removal or relocation of structures:
	Glacier Point snack bar and gift shop relocated (1 acre of shrubs in red fir community).	Same as alternative A.
	White Wolf stables relocated (2-3 acres of meadow).	Same as alternative A.
	Tuolumne Meadows stables relocated and road removed (15 acres of meadow).	Same as alternative A.
	Tuolumne Meadows dining room would remain in riparian area.	Tuolumne Meadows dining room relocated (1 acre of riparian area).
	Ahwahnee tennis courts removed (1-2 acres of black oak woodland).	Same as alternative A.
	Degnan's (0.4 acre of mixed conifer/oak woodland [or may be landscaped]).	Degnan's would remain.
	Yosemite Village garage and service station (1.5 acres of mixed conifer/oak woodland).	Same as alternative A.
	117 buildings at Yosemite Lodge (10 acres mixed conifer/riparian).	At least 39 and up to 42 cabins at Yosemite Lodge (5 acres of mixed conifer/riparian).
	48 units at Housekeeping Camp (2 acres riparian).	Same as alternative A.
	Primary concessioner warehouse (1.6 acres oak woodland).	Warehouse would remain.
	Yosemite Valley concession stables would remain.	Yosemite Valley concession stables relocated (10-12 acres riparian/mixed conifer).
(no net new disturbance)	Other areas of construction disturbance in previously disturbed areas that would be expected to result in no net new disturbance are those for maintenance and support facilities at Yosemite Village maintenance area and a grocery store at the Curry Village ice rink.	Other areas of construction disturbance in previously disturbed areas that would be expected to result in no net new disturbance are those for 134 lodging units at Yosemite Lodge; 149 cabin units at Curry Village; Yosemite Valley concession stables (to be built on the old Curry dump site); a 60-seat restaurant at Wawona; and a 50-seat restaurant at White Wolf.
Threatened, Endangered, and Sensitive Species	No direct impacts expected that would adversely affect long-term survival of threatened, endangered, sensitive or other wildlife species.	Same as alternative A.

Resource Affected	Alternative A (1980 GMP Proposal)	Alternative B (Final Proposal)
<u>Natural Environment (continued)</u>		
Threatened, Endangered, and Sensitive Species (continued)	<p>Potential for indirect impacts due to removal of vegetation, subsequent loss of lodgepole pine forest habitat for Sierra Nevada snowshoe hare, Sierra Nevada red fox, Pacific fisher, wolverine; habitat loss not significant when compared to amount available parkwide. This effect would apply to wildlife in general.</p> <p>Through retention of stables, brown-headed cowbird habitat would continue, creating indirect effects on state-listed endangered willow flycatcher through nest parasitism.</p>	<p>Same as alternative A.</p> <p>Slight benefit to willow flycatcher from removal of White Wolf stables (brown-headed cowbird habitat).</p>
Water Resources Floodplains	<p>Removal of structures would benefit natural floodplain values and reduce risk of injury to life and property.</p> <p>Structures that would be removed from the 100-year floodplain of the Merced River in Yosemite Valley are 48 units within 100 feet of the river at Housekeeping Camp, all Yosemite Lodge units within the floodplain (between 39 and 42 cabins and Pine Motel).</p> <p>Some concession structures would remain in the 100-year floodplain, requiring preparation of a statement of findings under NPS guidelines for floodplain management. Structures that would remain in the 100-year floodplain of the Merced River in Yosemite Valley are concession stables, 6 Ahwahnee cottages, 232 units at Housekeeping Camp. At Wawona, store, post office, gift shop would remain in the 100-year floodplain.</p>	<p>Removal of structures would benefit natural floodplain values and reduce risk of injury to life and property. Greater benefit to the 100-year floodplain of the Merced River in Yosemite Valley from proposed action than from alternative A because concession stables would be relocated out of the floodplain.</p> <p>Structures that would be removed from the 100-year floodplain of Merced River in Yosemite Valley are 48 units within 100 feet of river at Housekeeping Camp, Yosemite Lodge units within floodplain (between 39 and 42 cabins), concession stables.</p> <p>Same as alternative A. In addition, Pine Lodge would remain in floodplain. Structural flood mitigation would be required. The development concept planning process at Wawona would include consideration of non-floodplain sites for relocation of store, post office, and gift shop.</p>
Wetlands	<p>No new adverse effects on wetlands would be expected to result from actions of this alternative.</p> <p>Removal of structures from riverbanks and floodplains would benefit areas that might be classified as wetlands. Structures that would be removed are 48 units at Housekeeping Camp, all cabin units in floodplain at Yosemite Lodge.</p>	<p>No new adverse effects on wetlands would be expected to result from the final proposal.</p> <p>Removal of structures from riverbanks and floodplains would benefit areas that might be classified as wetlands. Structures that would be removed are 48 units at Housekeeping Camp, all cabin units in floodplain at Yosemite Lodge, dining room at Tuolumne Meadows. Proposal would benefit wetlands slightly more than alternative A because of removal of dining room.</p>

Resource Affected <u>Natural Environment</u> (continued)	Alternative A (1980 GMP Proposal)	Alternative B (Final Proposal)
Water Quantity	<p>Construction of 41 additional lodging units at Wawona would increase water usage by as much as 4,300 gallons per day. Effect would become significant during dry summer months when river flows decrease below 6 cubic feet per second. Implementation of proposal to increase Wawona water usage would require analysis of water rights.</p> <p>Water use by Yosemite Valley concession lodging would decrease by 23,000–35,000 gpd. Parkwide water use by concession lodging would decrease by 23,000–31,000 gpd.</p>	<p>Water use at Wawona lodging would continue at present level (8,000–10,500 gpd).</p> <p>Addition of four shower facilities to Yosemite Valley campgrounds would increase water use by an estimated total of 6,000 gpd. Water use by Yosemite Valley concession lodging would decrease by 20,600–42,000 gpd, and parkwide water use by 23,000–42,800 gpd.</p>
Water Quality	<p>General effects associated with construction would be temporary decreases in water quality due to runoff from soil erosion prior to site restoration.</p> <p>Water quality would be indirectly affected by visitors' trampling of riverbanks, which reduces vegetative cover, causing water temperature to increase. This could also result in decreases in dissolved oxygen.</p> <p>Stream turbidity might decrease from reduction of soil erosion after removal of 48 units from within 100 feet of riverbank at Housekeeping Camp.</p> <p>An increase in surface water diversion from the South Fork of the Merced in Wawona, which would result in very low flows, could potentially aggravate problems of water stagnation and lowered dissolved oxygen.</p>	<p>Same as alternative A.</p> <p>Same as alternative A.</p> <p>Same as alternative A.</p> <p>No increase in surface water diversion required. No additional effects on water quality would result from this final proposal.</p>
Wild and Scenic River Values	<p>No new development proposed that would adversely affect wild and scenic river values.</p> <p>Removal of 24 Housekeeping Camp structures and 117 Yosemite Lodge structures would enhance wild and scenic river values of the Merced River in Yosemite Valley.</p>	<p>Construction of replacement lodging in Yosemite Valley would be coordinated between designers and NPS staff to ensure that river values would not be degraded.</p> <p>Removal of 24 Housekeeping Camp structures, Yosemite Lodge cabins in floodplain, concession stables would enhance wild and scenic river values of the Merced River in Yosemite Valley. Relocation of Tuolumne Meadows dining room away from riverbank would enhance river values of the Tuolumne River. Removal of stables and dining room would make benefits for wild and scenic river values greater from proposal than from alternative A.</p>

Resource Affected	Alternative A (1980 GMP Proposal)	Alternative B (Final Proposal)
<u>Natural Environment (continued)</u>		
Air Quality	<p>Short-term decreases in air quality would result at construction sites from construction vehicle emissions and dust.</p> <p>Changes in transportation patterns would affect vehicle emissions, but changes have not been quantified. A transportation study would be required to quantify effects on air quality. Major adverse effects on air quality would not be expected to result from actions of this alternative.</p>	<p>Same as alternative A.</p> <p>Same as alternative A.</p>
Scenic Resources (removal of buildings)	<p>Removal of buildings would increase scenic quality in vicinity of removal:</p> <p>Removal of Ahwahnee tennis courts would result in restoration of 1-2 acres of scenic area (oak woodland).</p> <p>Redesign of the Yosemite Village mall and removal of Yosemite Village gift, clothing, sport, and beauty shop would result in a gain of 6.2 acres of scenic area.</p> <p>Removal of the Yosemite Village garage and service station would result in a gain of 1.5 acres of scenic area.</p> <p>Removal of the concession warehouse would result in a gain of 1.6 acres of scenic area.</p> <p>Removal of Degan's would add 0.4 acre of scenic area.</p> <p>Reduction of Housekeeping Camp from 280 to 232 units would result in a gain of 2 acres of scenic area.</p> <p>Removal of tent-cabins from the rockfall zone at Curry Village would add 4.2 acres of scenic area.</p> <p>Removal of the Curry Village ice rink would result in a gain of 1.7 acres of scenic area, but the gain would be lost in winter when the temporary ice rink was installed.</p> <p>Removal of 117 units from Yosemite Lodge would add about 10 acres of scenic area.</p>	<p>Removal of buildings would increase scenic quality in vicinity of removal:</p> <p>Same as alternative A.</p> <p>Village mall would remain; may be redesigned pending outcome of Yosemite Valley implementation plan.</p> <p>Same as alternative A.</p> <p>Warehouse would remain.</p> <p>Degan's would remain.</p> <p>Same as alternative A.</p> <p>Same as alternative A.</p> <p>Installation of a permanent ice rink would not alter existing scenic quality.</p> <p>Removal of Yosemite Lodge units located in the floodplain would add about 5 acres of scenic area.</p>

Resource Affected	Alternative A (1980 GMP Proposal)	Alternative B (Final Proposal)
<u>Natural Environment (continued)</u>		
<u>Scenic Resources (continued)</u>		
(nonglaring roofs)	Nonglaring roof materials or roofing colors chosen to blend with surroundings would be used on remodeled buildings and new construction to reduce impacts on building visibility as viewed from Glacier Point and trail overlooks.	Same as alternative A.
<u>Wilderness</u>	No new effects on wilderness would be expected to result from actions of this alternative.	No new effects on wilderness would be expected to result from the final proposal.
<u>Cultural Resources</u>		
<u>Historic Resources</u>	Removal of Ahwahnee tennis courts would alter the historic setting of the Ahwahnee Hotel National Historic Landmark but would not affect hotel's significant architectural qualities.	Same as alternative A.
<u>Historic Resources (continued)</u>	NPS consultation with state historic preservation officer would ensure that new construction, redesign, and alteration of existing facilities would not adversely affect Camp Curry Historic District.	NPS consultation with state historic preservation officer would ensure that new construction, redesign, and alteration of existing facilities would not adversely affect Camp Curry Historic District. More buildings would be removed from Camp Curry under the final proposal than under alternative A.
	NPS consultation with state historic preservation officer would ensure that redesign and alteration of existing facilities would not adversely affect Wawona Historic District. Relocation of hotel parking area, redesign of gas station facade would have beneficial effect of reducing modern intrusions on the scene.	NPS consultation with state historic preservation officer would ensure that redesign and alteration of existing facilities would not adversely affect Wawona Historic District. New construction would be designed for compatibility with historic scene. Relocation of hotel parking area, gas station facade would have beneficial effect of reducing modern intrusions on the scene.
	No modifications in White Wolf Historic District.	Modification of facilities in White Wolf Historic District would be carried out in accordance with the 1979 memorandum of agreement and design criteria to be prepared by NPS.
	No modifications to Tuolumne Meadows general store.	Construction of a general store at Tuolumne Meadows would be compatible with existing historic facilities according to design criteria to be prepared by the National Park Service.
<u>Archeological Resources</u>	Until exact locations are selected and preliminary designs are available for new construction, direct effects on archeological resources cannot be anticipated. Direct impacts on archeological resources would be avoided to the extent possible through consultation between designers and park archeology office. When sites could not be avoided, mitigative measures, including excavation and recording of sites, would be developed in consultation with state historic preservation officer.	Same as alternative A.

Resource Affected	Alternative A (1980 GMP Proposal)	Alternative B (Final Proposal)
<u>Cultural Resources (continued)</u>		
<u>Archeological Resources (continued)</u>	Should previously unknown sites be uncovered during construction, work would be stopped in the discovery area and the National Park Service would consult with the state historic preservation officer according to 36 CFR 800.11.	Same as alternative A.
<u>Local Economies</u>	<p>Implementation of construction actions outlined in this alternative would generate employment and income in Madera, Mariposa, Merced, Mono, and Tuolumne counties.</p> <p>Expanded employment opportunities in the five counties would be expected to result in minor temporary population increases and generate demand for housing, health care facilities, and social services.</p>	<p>Same as alternative A.</p> <p>Same as alternative A.</p>

CONSULTATION AND COORDINATION

SCOPING HISTORY: ISSUES AND CONCERNS

The National Park Service issued a Federal Register Notice (56 FR 29975) on July 1, 1991, announcing its intent to prepare a supplemental environmental impact statement to the 1980 final GMP/EIS for Yosemite National Park. The notice indicated that the supplemental EIS would focus on concession action items and that the Park Service intended to conduct scoping, or issue identification, with interested agencies, organizations, and individuals. This announcement was augmented by a letter from the park superintendent dated July 8, 1991, which was sent to 85 organizations and individuals to announce the Park Service's intent to prepare the supplemental EIS and conduct scoping.

The Western Regional Office of the Park Service contacted the following newspapers on June 28, 1991, and informed them of the upcoming scoping process: *Fresno Bee*, *Sacramento Bee*, *San Francisco Chronicle*, and *San Francisco Examiner*.

The initial scoping process included consultation and coordination efforts with a variety of government agencies, private organizations, and individuals to define issues and eliminate nonissues and to use such information in determining the scope of the EIS and the potential impacts that needed to be addressed. A total of 109 responses were received during the scoping period, which extended until August 15, 1991. The major issues described below were identified and addressed in this planning effort. Other issues are listed that were raised but found to be beyond the scope of this planning effort.

Goals and Actions of 1980 General Management Plan

There is concern that the original goals and actions for concession services set forth in the 1980 GMP should be fully implemented. Many of the specific action items have been only partially implemented; others have not been implemented. Concern also has been expressed because some actions not originally identified in the 1980 GMP have been undertaken. In addition, there is concern that certain aspects of concession operations are not in alignment with park purposes or with objectives for the preservation of natural and cultural resources.

Increases in Visitation

Concern has been expressed about increases in visitation to Yosemite National Park. In 1980, visitation to Yosemite was approximately 2.5 million. In 1989 it was more than 3.3 million, or an increase of 33%. The largest monthly percentages of change occurred in spring and winter; the nonsummer months accounted for 69% of the total increase. The number of day users, who arrive both by automobile and by tour bus, has risen most dramatically. Visitation statistics are displayed in table 4 in the "Affected Environment" chapter.

Lodging overnight stays in Yosemite have grown from approximately 890,000 in 1980 to about 1,050,000 in 1989, an increase of 17.8%. Lodging is at capacity during peak periods, and more overnight stays are occurring in "shoulder" seasons (periods before and after seasons of heaviest visitation).

Lodging and Food Service

There is concern that a full spectrum of accommodations, food service, and price levels should be maintained and that all those accommodations should reinforce the unique experience of being in Yosemite National Park. There also is concern about the design and efficiency of concession services.

Specific levels for lodging and food service were established in the 1980 GMP; however, many existing facilities are rapidly deteriorating, energy-inefficient, and poorly sited. Some visitors now prefer availability of such amenities as private bathrooms and showers. Food services are sometimes viewed as being inappropriate, inefficient, scattered, or poorly located. This causes impacts associated with travel to food outlets and congestion or eating in areas not designed for such use, such as nearby meadows or pedestrian walkways.

Commercial Services and Visitor Activities

Concern has been expressed that the levels and types of commercial services and activities offered should support park purposes and be necessary for visitor enjoyment of Yosemite. There is a perception that some services and activities now offered compete with or are unrelated to park purposes. Some activities have a traditional role, but they should be evaluated for effects on resources or on other visitor activities. There is a general desire that the role of concession operations further enhance interpretation and promote park values. At the same time, there will continue to be a resident population of employees who serve visitors and who need basic commercial services that are not available close to the park.

Concession-Related Visitor Transportation

Expansion of the concessioner-operated shuttle bus service has been requested. More stops at trailheads and scenic points also are desired. There is a concern that quieter, more fuel-efficient vehicles should be used and bicycle use encouraged through continued rental availability.

Socioeconomic Concerns

Concern has been expressed that changes in the services offered in the park might affect growth of gateway communities and increase the demand on county infrastructure and services. Overnight lodging facilities in gateway communities such as Mariposa, Fish Camp, and Oakhurst have increased by 1,300 rooms since 1980.

Issues Raised But Beyond Scope of Plan

Some issues raised by the public are beyond the scope of this plan.

Transportation. Several concerns were expressed regarding regional transportation systems, staging areas on the periphery of the park, and the increasing number of commercial bus tours. Those issues are beyond the scope of this document.

The National Park Service recognizes the importance of larger transportation issues that need to be resolved. The park has joined government agencies in a regional transportation study and is participating with The Wilderness Society in a transportation analysis. The *Draft Yosemite Valley Housing Plan* includes a transportation study and consideration of employee transportation needs and systems. Funds have been appropriated by Congress for the study of mass transportation at Yosemite; that study has been initiated. In

addition, Yosemite National Park is working with the California Energy Commission and Pacific Gas and Electric on a pilot program using electric vehicles. Other types of less polluting vehicles also are being considered.

Statement of Requirements and Concession Contracting Procedures. A number of people expressed concern regarding the procedures for defining the statement of requirements used to solicit concessioner operators. Concern also was expressed regarding the selection and contracting procedures for concession contracts. The parameters of these processes are set by the Concessions Policy Act (P.L. 89-249), NPS management policies, and NPS concession management guidelines (NPS-48). These concerns are beyond the scope of this planning effort. However, any actions undertaken under these procedures and processes are subject to NPS oversight, including the requirements of this *Concession Services Plan*.

Nonconcession Park Activities. Concern or support was expressed relative to a number of activities that are not concession-related, such as camping, environmental education programs, horse packing, and photography instruction. These activities are administered by the National

Park Service directly or through commercial use licenses; therefore, they are beyond the scope of this plan.

SUMMARY OF PUBLIC COMMENT ON DRAFT EIS

The public comment period began on December 27, 1991, when the EPA published a notice in the *Federal Register* (vol. 56, no. 249, p. 67073) that the draft *Concession Services Plan/Supplemental EIS* was available. The National Park Service notice of availability was published the same day (vol. 56, p. 67097).

The director of the National Park Service and the superintendent of Yosemite National Park announced the availability of the plan at news conferences on December 17, 1991, for national and regional media in Washington, D.C., and San Francisco, respectively. The comment period closed February 28, 1992.

More than 2,000 copies of the draft *Concession Services Plan/Supplemental EIS* were distributed to federal and state agencies, organizations, and interested individuals. The agencies and organizations to whom copies of the draft were sent are listed below.

Agencies and Organizations to Whom Draft Was Sent

Congressional Representatives and Committees

Honorable Alan Cranston, U.S. Senate
Honorable John Seymour, U.S. Senate
Honorable Tom Campbell, U.S. House of Representatives
Honorable Gary Condit, U.S. House of Representatives
Honorable Richard Lehman, U.S. House of Representatives
Honorable George Miller, U.S. House of Representatives
House Interior Committee

Federal Agencies

Advisory Council on Historic Preservation
Department of Agriculture
Forest Service
Soil Conservation Service
Department of the Army
Corps of Engineers

Federal Agencies (continued)

Department of Health and Human Services
Centers for Disease Control
Center for Environmental Health and Injury Control
Department of the Interior
Bureau of Land Management
Bureau of Reclamation
Geological Survey
U.S. Fish and Wildlife Service
Department of Transportation
Federal Highway Administration
Environmental Protection Agency
Federal Communications Commission

State Agencies, California

Department of Fish and Game
Department of Parks and Recreation
Native American Heritage Commission
Office of Historic Preservation
Office of Planning and Research, State Clearinghouse
Resources Agency of California
State Park System Planning

County Agencies

Madera County
Board of Supervisors
Air Pollution Control District
Planning Director

Mariposa County
Board of Supervisors
Air Pollution Control District
Housing and Community Development
Planning Department
Sheriff

Mono County
Board of Supervisors

Tuolumne County
Board of Supervisors
Air Pollution Control District
Planning Commission
Sheriff
Visitor's Bureau

Nongovernment Organizations

American Indian Council
Bay Area Council of Skiers
Butte Environmental Council
Center for Urban Affairs and Policy
Research
Central Sierra Planning Council
Conference of National Park Concessioners
Cragmont Climbing Club
Earth Island Institute
Environmental Defense Fund
Environmental Law Society, Stanford
University
Environment Now
Far West Ski Association
Friends of Yosemite
Highway 120 Association
Mariposa County Chamber of Commerce
Mariposa Indian Council
Mendocino Environmental Center
National Parks and Conservation
Association
National Tour Association
Natural Resources Defense Council
Pacific Advocates
Planning and Conservation League
Save the Redwoods League
Service Employees International Union
Sierra Club
Sierra Club Legal Defense Fund
Sierra Recreation Association
South Fork Women's Club
Southern Yosemite Visitors Bureau
Teamsters Local 386
The Wilderness Society
Trust for Public Land
Yosemite Association
Yosemite Fund
Yosemite Institute
Yosemite National Park Society
Yosemite Restoration Trust
Other Organizations and Individuals

Others to whom the document was
mailed included media, libraries,
schools, businesses, and individuals.

Comments at Public Meetings

Four public meetings were held on January 29, 30, and 31 and February 1, 1992, in Los Angeles, Fresno, San Francisco, and Yosemite National Park, California. A total of more than 1,075 people attended the meetings; 231 spoke. A list of speakers is available from Yosemite National Park. Notes were taken on the oral comments by the NPS planning team in attendance at these meetings. The comments were then compiled and analyzed. In addition, the meetings were tape recorded, and copies of the recordings were made available to those who sent requests, along with blank tapes.

The large majority of speakers favored alternative A, restating their support for the 1980 GMP as written and expressing concern about increasing commercialism and development within the park.

Written Comments

In addition to the oral comments given at the public meetings, 4,057 written comments were received during the comment

period. As with oral comments made at meetings, the large majority of written comments were in favor of alternative A, or the 1980 GMP alternative as written.

Comments from federal and state agencies, organizations, and selected companies are reproduced in this chapter, along with the NPS responses to them. The large number of cards and letters from individuals makes printing them infeasible; however, representative letters of those opposing the preferred alternative and favoring the preferred alternative are included. All individual cards and letters were read and reviewed for substantive comments. All substantive comments raised in individual letters were addressed by similar comments raised in the reproduced letters from agencies, organizations, and businesses. All letters received are available for examination in the Concessions Office at Yosemite National Park.

List of Comments Reproduced, and Responses

Members of United States Congress

1. Senator Alan Cranston
2. U.S. Representative Tom Campbell
3. U.S. Representative Nancy Pelosi (letter also signed by U.S. Representatives Barbara Boxer, George Brown, Gary Condit, Ronald Dellums, Mel Levine, Robert Matsui, Leon Panetta, and Pete Stark)

Federal Agencies

4. Advisory Council on Historic Preservation
5. Public Health Service Centers for Disease Control, U.S. Department of Health and Human Services
6. Indian Arts and Crafts Board, U.S. Department of the Interior
7. Environmental Protection Agency
8. U.S. Fish and Wildlife Service, U.S. Department of the Interior

California State Legislature

9. Senator Herschel Rosenthal (letter also signed by Senators Alfred Alquist, Cecil Green, Patrick Johnston, Nicholas Petris, and Robert Presley)

State Agencies

10. Resources Agency of California

Local Officials

11. Tuolumne County Supervisor Larry Rotelli
12. Los Angeles City Councilman Zev Yaroslavsky

Local Agencies

13. Mono County Local Transportation Commission
14. Mono County Planning Department

Organizations

15. American Youth Hostel, Central California Council
16. Audubon Society, Los Angeles Chapter
17. Audubon Society, Mesilla Valley Chapter, New Mexico
18. Audubon Society, Mount Diablo Chapter (Walnut Creek, CA)
19. Audubon Society, Napa-Solano Chapter (Vallejo, CA)
20. National Audubon Society, Western Regional Office, Sacramento
21. Audubon Society, Prescott Chapter, Arizona
22. California Parks & Conservation Association
23. California Scholarship Federation
24. Conference of National Park Concessioners
25. El Portal Shuttle Supporters
26. Environment Now
27. Fish Camp Property Owners Association
28. High Sierra Hikers Association
29. Highway 120 Association
30. Mariposa County Chamber of Commerce
31. Mariposa Lodging Council
32. National Parks and Conservation Association
33. National Wildlife Federation
34. Pacific Advocates
35. Peninsular Conservation Center Foundation
36. Planning and Conservation League
37. Service Employees International Union, AFL-CIO
38. Sierra Club, Vice President Edgar Wayburn
39. Sierra Club, Yosemite Task Force
40. Sierra Club, Kern-Kaweah Chapter (Tehachapi, CA)
41. Sierra Club, Mother Lode Chapter (Sacramento)
42. Sierra Club, San Francisco Bay Chapter
43. Sierra Club, Sangre de Cristo Chapter (Pueblo, CO)
44. Sierra Club Legal Defense Fund, San Francisco
45. The Wilderness Society (letter also signed by Yosemite Restoration Trust, Natural Resources Defense League, Sierra Club, National Audubon Society, and Yosemite Action)
46. Yosemite Association

CONSULTATION AND COORDINATION

- 47. Yosemite National Park Society
- 48. Yosemite Restoration Trust
- 49. Yosemite Teamsters Local 386

Companies

- 50. American Traditions
- 51. Ansel Adams Gallery
- 52. Brink International Associates
- 53. Boykin Management Company
- 54. El Portal Child Development Center
- 55. LPA, Inc.
- 56. Navajo Arts and Crafts Enterprise
- 57. Patagonia, Inc.
- 58. Pueblo of Zuni
- 59. Tansey, Rosebrough, Gerding & Strother, P.C. (representing United Indian Traders Association)
- 60. Yosemite Valley Railroad Company
- 61. Yosemite West

Individuals (representative letters only)

- 62. James B. Harnagel
- 63. Mary and Edward Newton-Ballman

COMMENTS

STATEMENT BY SENATOR ALAN CRANSTON
REGARDING DRAFT CONCESSION SERVICES PLAN
FOR YOSEMITE NATIONAL PARK

February 1, 1992

This is an historic occasion. Yosemite National Park is truly a national treasure and indisputably the flagship of the American park system. Its dazzling panoramas and quiet nooks of spectacular beauty are found throughout the 760,000 acres of the park.

Yosemite is one of the most visited parks in the country, enjoyed by nearly 3.5 million visitors each year. The monolithic grandeur of Half Dome, the drama of El Capitan and the majesty of Bridalveil Falls are images etched into the memories of these visitors. Yosemite's commanding peaks and valleys have been the inspiration of many.

This is the first time the public has been asked to comment on a concession services plan for a national park. Having full public involvement, particularly at this stage in the process, is a welcome change and I applaud the National Park Service for taking this step. I also applaud Mike Finley's willingness to consider amendments to the plan.

Unfortunately, I am disappointed with the draft concession services plan for Yosemite National Park.

California's beautiful environment has always been at the top of my agenda -- along with peace, which is really the supreme environmental issue. Last November I wrote to National Park Service Director James Ridenour and Western Regional Director Stanley Albright regarding the Concession Services Plan. In those letters, I made three points: First, the concessioner should be required to comply more swiftly and in general -- not in all respects -- with the terms of the General Management Plan for Yosemite. Second, the Concession Services Plan should clearly identify costs and revenues associated with implementation of each aspect of the General Management Plan. Third, the concession bidding process should reward those who enhance the natural experience of Yosemite visitors as well as provide commercial services.

In each of these three areas, the draft plan is a failure.

First, the Park Service draft proposes major and unacceptable changes in the Yosemite General Management Plan. For example, I believe there should be no new construction of lodging in the park. That is an inappropriate challenge to the park's natural resources. It would further degrade the experience of visitors to this wonderful valley. And it ignores the fact that many business people in the surrounding communities are already providing new motel and hotel lodging to Yosemite visitors. The Concession Services Plan should implement the general thrust of the General Management Plan -- but I recognize that it is imperfect and should be reviewed. I do not favor all the new construction it calls for, such as a brand new market.

Second, the draft fails to indicate how and when its provisions will be implemented. In response to my November letter, Regional Director Albright wrote me that implementation of Park Service proposals would not be completed even within 15 years. This is far too slow a schedule.

RESPONSES

Letter 1

- 1a The *Concession Services Plan* does not deviate from the GMP's broad goals, policies and programs. In addition, all 33 concession-related developed area goals are to be implemented; some have been implemented already. Some specific action items related to those goals have been changed in the plan through the amendment process as provided for in NPS planning guidelines.

The GMP recognizes overnight stays in the park as a legitimate, desirable activity as part of the park experience. The GMP also allows for replacement of worn facilities and calls for redesign of areas such as Curry Village and Housekeeping Camp. The GMP envisioned new construction in Yosemite Valley, as stated on page 79:

"New facilities never before provided are also proposed. Whenever possible new facilities will be built when most or all of the economic usefulness of the replaced facility has been realized."

The development that has occurred outside the park boundary is not ignored in the draft supplemental EIS. A description of this development is provided under Local Economies in the "Affected Environment" chapter, and changes in the final *Concessions Services Plan* have been made in light of development outside of the park.

1a

COMMENTS

RESPONSES

1b

The Concession Services Plan should provide a firm timetable and financing plan for the concessioner portion of the General Management Plan and that timetable should be as rapid as possible, certainly not as slow as 15 or 20 years. The public has already waited 12 long years since the General Management Plan was adopted. The time has come for the Park Service to commit to speedy action.

I understand that the non-profit Yosemite Restoration Trust is proposing a way to implement the concessioner portion of the General Management Plan by the year 2000. That, too, seems to me a long way off, but it's a far better target date, and the Yosemite Restoration Trust's proposal should be given serious consideration.

1c

Third, the draft fails to discuss how the next concessioner will be chosen, merely stating that such concerns are "beyond the scope" of the Concession Service Plan. This is unacceptable. The Yosemite concession plan and contract will be models for concessioner contracts in all large national parks. If the Park Service's primary criteria in selecting a concessioner is the amount of fees paid to the federal government, the process can work against those bidders who are inclined to protect the environment.

The concession bidding process should be designed to reward those who enhance the natural experience of Yosemite visitors, and, I suggest, to maintain relationships and opportunities with those who have already demonstrated over the years their love for Yosemite and their dedication to preserving its natural beauty. I question interference with the operations of successful, traditional, appropriate operations, such as those of the Ansel Adams Gallery.

The draft concession service plan needs to be redone, taking into account these comments and those of the public. The Park Service should issue a revised draft plan and allow another period of public comment and then act. Our national park system deserves no less. Yosemite deserves no less.

In closing, I want to note that many other problems facing Yosemite need attention, but are not on today's agenda - notably air quality and transportation. Let us not neglect them.

I thank you for the opportunity to express my thoughts to you.

1b

The timetable discussion in the final supplemental EIS has been expanded to include 5-year implementation phases for concession items; however, an exact year-by-year progression of development is not possible at this time, as indicated in the plan.

1c

The purpose of the *Concession Services Plan* is to provide overall park management guidance relative to concession services, including defining levels and types of concession services. The parameters for defining the statement of requirements used to select a concession contract are set by the Concession Policy Act (P.L. 89-249), NPS management policies, and NPS concession management guidelines (NPS-48). The statement of requirements for the Yosemite contract will include criteria concerning park values as part of the selection process. In addition, the new concessioner and its activities will be subject to the requirements of the GMP as amended by the *Concessions Services Plan*.

COMMENTS

RESPONSES

TOM CAMPBELL
12TH DISTRICT, CALIFORNIA

313 CAMDEN HOUSE OFFICE BUILDING
WASHINGTON, DC 20514
(202) 225-5411

DISTRICT OFFICES

889 NORTH MATHEWSON AVENUE, SUITE 105
SUNNYVALE, CA 94086
(408) 245-4830
(415) 221-9154

7415 SUNDOWNY STREET, SUITE D
GLADYS, CA 95020
(408) 848-5101



Congress of the United States House of Representatives

January 19, 1982

Mr. Michael V. Finley
Superintendent
Yosemite National Park
National Park Service
P.O. Box 577
Yosemite, California 95389

Dear Superintendent Finley:

First, I'd like to take a moment to thank the National Park Service (NPS) for recognizing the importance of citizen input to the draft Concessions Service Plan (CSP) by hosting three public hearings throughout California. The significance of any hearing is to gather as much public input as possible, from all sources, which can become an invaluable resource to NPS in the final plan for the park.

Yosemite National Park is a unique, historic, and significant national treasure enjoyed by Americans for generations. Our common goal must focus on being proper stewards so that future generations may also enjoy this natural wonder.

I have received a number of letters and telephone opinions from citizens throughout California raising substantial concerns about the CSP proposal. All of the comments have mentioned two very important issues -- overcrowding and commercialization of the park's resources.

I'm convinced that a discussion of a new CSP must begin with a careful look at the services necessary to ensure access to the park for all who desire to visit, while giving full protection to its fragile environmental ecosystems. To this end, three main topics must be addressed in the implementation of a new CSP: Lodging and food service, day use and multi-day use activities and transportation to and within the park.

Lodging and food service should not be dramatically expanded because of possible and unnecessary harm to the surrounding environment. The NPS should look to the public for substantial input in the determination of any proposed

COMMITTEE ON BANKING,
FINANCE AND URBAN AFFAIRS

COMMITTEE ON THE
JUDICIARY

COMMITTEE ON SCIENCE,
SPACE, AND TECHNOLOGY

HOUSE COMPETITIVENESS CAUCUS

CONGRESSIONAL CAUCUS FOR
YOUNG BUSINESS

CONGRESSIONAL GRACE
ROBMAN CAUCUS

HUMAN RIGHTS CAUCUS

ENVIRONMENTAL AND
ENERGY STUDY COMMITTEE

Letter 2

2a

As described in the draft supplemental EIS, lodging and food service would not be substantially expanded. Environmental impacts from the final proposal would be minimal, as described in the final document—lodging would be decreased by 15.2% overall and by 20.5% in Yosemite Valley. This is a greater reduction in lodging than was called for in the 1980 GMP.

The proposal includes a slight increase in food service seating, but generally it would involve redesign of existing facilities. The only new food service development proposed is a small restaurant at Wawona; and in the valley the amount of development would be reduced. Existing development would be relocated from sensitive habitats such as subalpine meadows at Tuolumne Meadows to less sensitive communities such as lodgepole pine forest. Additional environmental review will be required during subsequent site-specific planning and design, and mitigation will be prescribed for any adverse impacts that result.

2a

COMMENTS

Mr. Michael V. Finley -- Page 2

expansions. If, in fact, prudent construction projects are necessary to provide for adequate service they must be accomplished through appropriate environmental guidelines.

Day use and multi-day use activities within the park's boundaries should be addressed consistently. The NPS must do its best to accommodate all visitors to Yosemite, but it is imperative that a comprehensive plan be developed to protect sensitive and, in some cases, rare plant and species habitat. Because recent projections show that a record number of people will visit the park over the next decade, it is equally vital that NPS officials be prepared to aggressively prevent facility misuse caused by overcrowding.

The transportation patterns and road congestion, even though not specifically addressed in CSP, must be reviewed concurrently. Increased bus traffic, and other vehicular traffic has been cited as the leading cause of pollution in Yosemite Valley. The CSP must address any anticipated increases in traffic patterns that would result in new development plans for the park.

Vitaly important, the NPS should consider taking steps to emphasize meaningful education programs about the park's diverse natural beauty and made available to the public. Many environmental public interest groups throughout California might be called upon as a resource in developing appropriate curriculum.

The National Park Service mission is clear: To administer the park for the enjoyment and education of our citizens, to protect the natural environment of the park and to allow the State, local governments and our citizens to assist in the development of the park. Your willingness to hold these hearings is a positive step in that direction.

Thank you again for considering my views on this very important issue.

Best regards,


Congressman Tom Campbell

TC:cb

RESPONSES

2b

Transportation planning encompasses many issues that were determined to be beyond the scope of this plan. This plan is a specific implementation plan focused on concession services and tiering from the 1980 GMP/EIS. Other implementation plans, such as housing and transportation, also are being developed; they also tier off the GMP/EIS. The *Concession Services Plan* stays within the visitor use levels indicated on page 17 of the GMP; therefore, no new traffic patterns would be expected to result from this plan. In this final supplemental EIS, the text has been modified to provide further information on other transportation planning.

2c

The National Park Service conducts interpretive programs under the guidance of an interpretive prospectus and an interpretive plan. In addition, the concessioner has offered specialized interpretive activities and will continue to do so. The Park Service works with the Yosemite Institute and other nonprofit organizations throughout the country in developing its educational programs.

COMMENTS

RESPONSES

NANCY PELOSI
8TH DISTRICT, CALIFORNIA

108 CANNON BUILDING
WASHINGTON, DC 20515-0505
205/221-4806

DISTRICT OFFICE
FEDERAL BUILDING
480 GOLDEN GATE AVENUE
SAN FRANCISCO, CA 94102-3480
(415) 398-4802

**Congress of the United States
House of Representatives
Washington, DC 20515-0505**

January 30, 1992

Michael Finley, Superintendent
Yosemite National Park
P.O. Box 577
Yosemite, California 95389

Dear Superintendent Finley:

We are writing to add our comments to the Draft Concession Services Plan (DCSP) for Yosemite National Park.

One only has to visit Yosemite National Park in order to recognize that a precious resource is in danger. The overcrowded roads, trails, accommodations and commercialization of Yosemite are evidence of the tremendous human impact that has had tragic results for a once pristine wilderness.

For this reason, we are very concerned about the DCS plan and are opposed to a number of its components. Our specific comments on the Draft Concession Services Plan follow:

Consistency with 1980 Yosemite General Management Plan

In 1980, a General Management Plan (GMP) for Yosemite National Park was developed, in accordance with Public Law 95-625. The purpose of the GMP was to chart the future course for Yosemite. Over one hundred years have passed since Yosemite National Park was created in 1890, and over twelve years have passed since the GMP was prepared to determine the future of one of the nation's premier national parks. This plan has yet to be implemented.

The original process to develop Yosemite's GMP was not without controversy, nor without considerable effort to alleviate some of the controversy, which resulted in a solid compromise between the competing interests of development and conservation.

Very little progress has been made toward implementing the original GMP for Yosemite. The Draft Concessions Services Plan provides the National Park Service and the public with the opportunity to finally implement the concessionaire provisions of the GMP. As outlined in the 1980 GMP, the primary focus of our efforts should be on protecting Yosemite's natural resources, not on providing conveniences to park visitors.

COMMITTEE ON APPROPRIATIONS

SUBCOMMITTEES
COMMERCE, JUSTICE, STATE
AND JUDICIARY

TREASURY, POSTAL SERVICE AND
GENERAL GOVERNMENT

COMMITTEE ON STANDARDS OF
OFFICIAL CONDUCT

NORTHERN CALIFORNIA ZONE WHIP
DEMOCRATIC STUDY GROUP
REGIONAL WHIP
CONGRESSIONAL WORKING GROUP
ON CHINA, CHAIR

Letter 3

Michael Finley
January 30, 1992

Page Two

3a

The CSP should be redrafted to include all concession-related GMP action items with specific timetables established for concessioner implementation of the GMP action items.

Public Process

In 1984, Yosemite was designated a World Heritage Site. The importance of Yosemite to our State, and to the entire world, commands us to encourage the highest level of public involvement in a process that could well determine the future of all national parks.

To ensure the best decisions about the future of our public domain, the highest level of public scrutiny should be encouraged. We commend you for conducting regional hearings throughout California. Your continued efforts to ensure public participation will only enhance the process and provide you with the best tools for determining good national park policy.

3b

Because of the strong interest in the future of Yosemite National Park, we urge you to incorporate the comments from the current public hearings, as well as the concession-related action items from the 1980 GMP into a new draft CSP for public comment.

Public-Use Facilities

-- Accommodations

National Parks should be unique places to visit; not microcosms of city life. The replacement of low-cost tent cabins by a two-story motel substitutes commercial for rustic. It also means there are fewer accommodations for those of moderate means who might be able to afford a tent cabin but not a motel room. It also compromises the "nature experience" for those who appreciate national parks for their natural beauty and who do not expect to visit a resort when they come to Yosemite. And, finally, it eliminates the choice that has existed for visitors to decide between rustic and commercial accommodations.

The emphasis should be on reduction rather than on the substitution of new facilities for old ones. While the draft plan estimates a reduction of 13% in accommodations in the Park, this reduction removes modest, more natural accommodations from public use.

3a

See responses 1a and 1b.

3b

As part of the planning/environmental analysis process, all public comments in writing and from public meetings have been reviewed. As a result, elements of the proposal have been modified and these responses published.

COMMENTS

RESPONSES

Michael Finley
January 30, 1992

Page Three

3c

New lodging units should not be considered unless they are specifically authorized by the 1980 GMP.

It is not the amount of reduction that is important, but rather the overall direction of the park which continues to be toward greater commercialization, at greater financial expense to the park visitor, and even greater expense to the park itself.

-- Food Service

Current food service in the Valley is very inefficient in peak periods, sometimes involving long lines, slow service, and an overly commercial and congested atmosphere. Although improvements are needed in the efficiency of restaurants and other food areas, they should not be made at the expense of GMP mandate specifying which buildings and areas are to be devoted to food service.

3d

Food service should be improved within the GMP-designated buildings through more efficient operations, extending the hours available for lunch, expanding picnic areas, and redirecting tour buses if necessary. This will provide the appropriate balance between providing food and protecting the resource and the visitor's experience of Yosemite's natural setting.

3e

The CSP should also include a review of the effects of commercial bus tours on overcrowding of food services, as well as resource damage. The National Park Service should exercise its existing authority to regulate these companies to reduce their impacts.

Structures

3f

Only those guidelines for structures in the 1980 GMP should be considered and implemented. Those buildings planned for removal should be removed, consistent with the GMP. Additionally, those structures in place for public use at the time of the 1980 GMP should be returned to the public for use.

Transportation

Again, the overall direction of park planning should be based on the reduction of vehicles through the Valley. The interest of the National Park Service in installing electric buses is applauded.

3c

The approved 1980 *General Management Plan* remains in effect until it is revised, and there is no set time requirement for revision. The NPS planning guidelines provide for revising and amending a GMP to allow flexibility to consider new needs and circumstances as they arise. An amendment deals essentially with a single issue that can be addressed without requiring a revision of the parts of the GMP that deal with other issues. As stated in the summary section of this document, the *Concession Services Plan* amends the portions of the GMP that relate to concession services and tiers off the 1980 GMP/EIS. The goals of the GMP remain the same, and the National Park Service is committed to realizing those goals. Also see response 1a.

3d

The final proposal contains three changes from the GMP pertaining to food service: retain Degnan's, retain a redesigned Curry Village food pavilion, and add a small restaurant in Wawona. For the foreseeable future, it will be necessary to use Degnan's for food service purposes. As part of the redesign of the building, food service would be analyzed to determine the most efficient use of the building as well as how the building can be a more enjoyable place to eat.

In the long term, the National Park Service agrees that the Degnan's building should be removed. However, the stated purpose for its removal (as part of a redesign of the area for a bus turnaround) has been changed, while the demand for mid-day food service has continued. If future transportation or other planning requires the Degnan's building be vacated, it will be. It is premature at this time to schedule removal of this building, as it is still needed to provide food service. It should be noted that food service will always be a visitor necessity in the village area.

The type of food service to be offered in the current cafeteria area of the Curry Village Food Pavilion will be further examined. The intent is to provide a flexible area for different types of service at all three meals. A food service analysis by a consultant would be made before the building is redesigned; options considered would be its use as a cafeteria (along with adjacent outside terraces), as a low-cost restaurant, as a combination line order with entree service, and as a fast-food facility. The potential adjustments in clientele also would be considered, but providing low-cost service in an efficient manner is the primary consideration. Extended hours of operation and the

COMMENTS

Michael Finley
January 30, 1992

Page Four

3g

While electric buses could alleviate congestion and poor air quality, their installation should not be used to increase visitation in the Valley. To protect Yosemite's resources and to enhance the visitor's experience at Yosemite, visitation to the park should continue to be carefully monitored and controlled. A day-use reservation system should be instituted to control park congestion.

The 1980 GMP revealed that automobiles in the Valley were the greatest threat to Yosemite's natural resources. Based on this data alone, our goal should be to eliminate private cars from the Valley. Recent pictures of Grand Canyon National Park have raised our awareness of threats to natural resources we considered protected. We are now facing the reality that none of our national parks are safe from pollution and degradation from other human impacts.

3h

A separate concession contract should be initiated to provide bus transportation from gateway sites in neighboring communities into the park. The reduction of this threat should be given the highest priority in all facets of park planning, and particularly in concessions planning, and to assist in eliminating private automobiles from the Valley.

Concessionaire Policy and Activities

The Draft Concession Services Plan for Yosemite should be consistent with the original management plan for the park. Additionally, any plan to revise current concession policy should not be considered in a vacuum, without a comprehensive review of how all of the park planning elements will conform to the intent of the original GMP, as well as to the intent of Congress in creating a national park system for the purpose of resource protection.

3i

Concessionaire activities that have not been conducted in accordance with the 1980 GMP should be withdrawn from the park. A number of promotional activities by the Curry Company have evolved at Yosemite that were not in keeping with the GMP and contribute to increased commercialization at great environmental expense. It should be clear that Yosemite advertises itself; it does not need to offer video rentals or special festivities to lure visitors.

More and more, we witness the control of our national parks transferred to corporations whose goal is to turn a large profit on tourist dollars. Concessionaires, corporate or otherwise, should not be in a position to exert their influence over any portion of the park planning process.

RESPONSES

facility's ability to absorb large numbers of people during inclement weather also would be considered in the analysis.

The proposed small additional restaurant in Wawona is necessary to serve expanded camping and general visitation to the area.

To maximize efficiency, existing seating added at various outlets since the 1980 GMP would be retained under the final proposal; thereby concentrating use at previously hardened sites and reducing impacts on nearby meadows and restored areas. Expansion of picnic areas throughout the park is an issue broader than the scope of the concession services plan, and it will be considered by park management as part of park operations.

3e

The effect of visitors on commercial bus tours, as well as other modes of transportation, have been considered in the plan. Yosemite National Park will develop a system to manage and control the numbers of buses to and within the park. This will involve the use of commercial use licenses or other forms of permitting as necessary. Effects on resources and visitors' experience from commercial bus tours will be examined in transportation studies that have been or will be initiated, and appropriate mitigation will be undertaken.

3f

See response 3c. In response to public comment, the Mountain Room Bar area will be returned to a public guest lounge.

3g

Day-use limitation is a broad operational issue that must be reviewed in context with resource management, transportation, infrastructure and personnel. A traffic management plan has been used since 1985 to control day use in Yosemite Valley. Visitor use limits were established in the GMP; they have not been altered in the *Concession Services Plan*. The National Park Service will continue to monitor day use and seek better ways to deal with the numbers of visitors; this could include a reservation system.

3h

The primary concessioner is involved only in intra-park transportation services, plus limited service to Lee Vining as part of the Tioga Road service. There is no commitment to the primary concessioner for the development and operation of a larger system;

COMMENTS

Michael Finley
January 30, 1992

Page Five

The primary incentive of national park concessionaires is to make a profit. This is understandable. The problem inherent in this financial relationship is that the drive to profit may overshadow the drive to maintain national parks in their intended state, as required by law. A clear line needs to be drawn between accommodating more visitors to increase a profit and proper stewardship of a national park.

Whatever concessions policy is developed for Yosemite should not allow the next concessionaire to dominate operation of or profits from the park. The National Park Service must maintain and exert strong authority over park concessions to ensure that resource protection is always a priority over park visitation and development. This authority should also extend to phased-in ownership of park structures and facilities. The National Park Service should clearly be in charge of its national parks.

Because of the preferential treatment that has been given to national park concessionaires, it has become necessary for Congress to review concessionaire policy and to offer reforms that will outlaw the "sweetheart deals" that put profits over parks.

Concessions policy must have park protection as its primary goal, allow a concessions operator to profit a set maximum from concessions and return a reasonable amount of the profit to support the park's resources. The underfunded national park system could well benefit from concessions revenue returned directly to the park instead of to the general treasury.

Current law on possessory interest favors the concessionaire. Congress is also reviewing possessory interest policy and may eliminate this unique arrangement, as well as the right of preference enjoyed by concessionaires in renewing contracts. These reforms would promote park ownership of park properties and improve competition for contracts.

The original Act, which established the National Park Service, within the Department of Interior, states: "The service thus established shall promote and regulate the use of the Federal areas known as national parks, monuments and reservations...by such means and measures as conform to the fundamental purpose of the said parks, monuments and reservations, which purpose 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."

RESPONSES

such a system is part of the broader transportation issue. Also see response 2b.

3i

The GMP did not address specific special events or advertising practices. As called for in the plan, special events and marketing efforts by the concessioner would decrease in the future. Video rentals were a service for employees; in the future they will be provided at an employee facility.

COMMENTS

RESPONSES

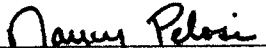
Michael Pinley
January 30, 1992

Page Six


We are stewards of the environment, charged with the responsibility to honor the promise we have made to preserve national parks for future generations. The decisions we make for the future of Yosemite will influence the future of all our national parks.

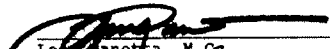
We urge you to give the strongest consideration to our comments and to implement a concessions policy that provides the maximum protection to Yosemite's unique natural treasures.

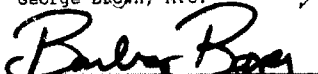
Sincerely,

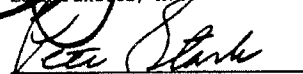

Nancy Pelosi, M.C.

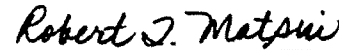

Gary Condit, M.C.

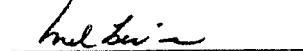

George Brown, M.C.

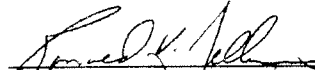

Lesca Zanatta, M.C.


Barbara Boxer, M.C.


Pete Stark, M.C.


Robert Matsui, M.C.


Mel Levine, M.C.


Ronald Dellums, M.C.

COMMENTS

Advisory Council On Historic Preservation

The Old Post Office Building
1300 Pennsylvania Avenue, NW, # 809
Washington, DC 20004

Reply to: 730 Simms Street # 401
Golden, Colorado 80401

March 2, 1992

Stanley T. Albright
Regional Director
Western Region
National Park Service
600 Harrison Street, Suite 600
San Francisco, CA 94107-1372


RE: Draft Concession Services Plan/Environmental Impact Statement,
Yosemite National Park, California.

Dear Mr. Albright:

On January 6, 1992, we received a copy of the draft Concession Services Plan (CSP)/Environmental Impact Statement for Yosemite National Park. Based on the limited information contained in the CSP, it appears that the proposed revision to the 1980 General Management Plan (alternative B) may have a greater effect on historic properties than did the original proposal (Alternative A), and as such is a less desirable alternative from a historic resources perspective. This assessment is based on the proposal under Alternative B for a greater reduction in the number of tent cabins in the Curry Village Historic District, and for the elimination of all cabins without baths.

Thank you for providing us with the opportunity to review and comment on this document. If you have any questions, please contact Carol Gleichman of our staff at (303) 231-5320 or FTS 554-5320.

Sincerely,


Claudia Nisaley
Director, Western Office
of Project Review

RESPONSES

Letter 4

- 4a The National Register nomination for the Curry Village Historic District asserts that the significance of the tent-cabins "is minimal and exists only in a collective sense." The National Park Service will consult with the California State Historic Preservation Office on the specific site plan for the redesign of Curry Village to ensure preservation of the qualities that make the historic district eligible for the National Register.

COMMENTS

RESPONSES



DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Centers for Disease Control
Atlanta GA 30333
February 14, 1992

Superintendent
Yosemite National Park
P.O. Box 577
Yosemite National Park, California 95389

Dear Sir:

We have completed our review of the Concession Services Plan/Draft Environmental Impact Statement (DEIS) for Yosemite National Park, California. We are responding on behalf of the U.S. Public Health Service.

We have reviewed the DEIS for potential adverse impacts on human health, and believe our concerns have been adequately addressed, with one exception. Our review did not reveal the plans for disposition of those buildings designated for removal. A total of 620 structures, including a garage and service station, would be removed. The final EIS should address the disposition of these structures and indicate if asbestos is present in any of the structures. Also, regarding removal of the service station and garage, the FEIS should address potential contamination (i.e. underground fuel tanks, waste oil?) and planned mitigation to ensure adequate cleanup if needed.

Thank you for the opportunity to review and comment on this draft document. Please ensure that we are included on your mailing list to receive a copy of the Final EIS, and future DEIS's which may indicate potential public health impacts and are developed under the National Environmental Policy Act (NEPA).

Sincerely yours,

Kenneth W. Holt, M.S.E.H.
Special Programs Group (F29)
National Center for Environmental
Health and Injury Control

Letter 5

5a

The final document has been changed to reflect the disposition of structures to be removed and to address potential contamination and cleanup of soils in the vicinity of the garage and gas station. All buildings will be examined before removal for the presence of hazardous substances. If hazardous materials are present, they will be removed in accordance with all applicable laws and regulations.

COMMENTS



United States Department of the Interior

INDIAN ARTS AND CRAFTS BOARD
WASHINGTON, D.C. 20240

[When writing to us, please include
"Room 4004, Main Interior Building"
in the address]

Superintendent
Yosemite National Park
P.O. Box 577
Yosemite National Park, California 95389

Re: Draft concession services plan/draft supplement to the
Final Environmental Impact Statement

Dear Sir:

We are concerned about your proposal to eliminate all Southwest American Indian handcrafts from the concessions at Yosemite, as described on pages 12 and 13 of the plan. We applaud the explicit emphasis on obtaining American Indian handcrafts produced in the immediate region, but handcrafts produced by American Indian craftsmen in other areas, and specifically in the Southwest, should not be eliminated.

We are aware that the National Park Service's concessions policy for handcrafts, gifts and merchandise is to promote products that relate to the cultural, historical, natural and geographic characteristics of park areas. However, we believe this proposal reflects an exceedingly narrow view of what is related to the Yosemite National Park area, its interpretation, and park goals.

For some 50 years, the National Park Service has treated American Indian handcrafts differently than other concessions merchandise and even other United States handcrafts. It has actively encouraged sales of American Indian handcrafts throughout the park system as products that are uniquely American, and in support of the American Indian cultural and economic development mission of the Department of the Interior (which is also carried out in complementary ways through such agencies as the Bureau of Indian Affairs and the Indian Arts and Crafts Board). Your proposal contradicts that history.

RESPONSES

Letter 6

- 6a In response to public comment, the final document has been changed to reflect that appropriate hand-crafted items by all Native Americans are acceptable sales items. The National Park Service will work with local Indian councils on promoting local American Indian handcrafts.

6a

COMMENTS

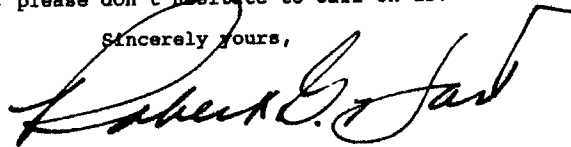
RESPONSES

While there is nothing wrong with the concept of an "environmental shop" that you propose to establish instead of the current Indian Shop that features primarily Southwest American Indian crafts, there is nothing unique about it either. Most urban areas and suburban malls have an environmental shop, and this sort of merchandise is a focus of national mail order retailing these days. On the other hand, American Indian crafts are uniquely American, and we believe that is particularly significant to the many foreign visitors at Yosemite, some 25% of visitation, and to the general public.

You are proposing to eliminate preferred merchandise that has been featured at Yosemite National Park for decades, and which amounts to approximately \$1 million in annual sales of Indian crafts. Although you convened a diverse scoping group that represented a wide range of commercial and consumer interests, it appears that the National Park Service has not consulted any Indian tribe or Indian-owned crafts marketing enterprises or Indian craftspeople to attempt to determine the impact of your proposal. This disparate treatment should be remedied.

If we can assist you in giving further consideration to the current proposal, please don't hesitate to call on us.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Robert G. Hart", with a large, sweeping flourish extending from the end of the signature.

Robert G. Hart
General Manager

COMMENTS

RESPONSES



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, Ca. 94105

February 28, 1992

Michael Finley, Superintendent
Yosemite National Park
P.O. Box 577
Yosemite National Park, CA 95389

Dear Finley:

The U.S. Environmental Protection Agency (EPA) has reviewed the Concession Services Plan, Draft Supplemental Environmental Impact Statement (DSEIS) to the General Management Plan for Yosemite National Park, California. Our comments on this DSEIS are provided pursuant to the National Environmental Policy Act (NEPA) and EPA's authorities under §309 of the Clean Air Act.

The DSEIS identifies and evaluates two alternatives for management of concession services in Yosemite National Park. Alternative A represents the No Action alternative and was selected as the proposed alternative in the 1980 General Management Plan (GMP) Final Environmental Impact Statement (FEIS) and Record of Decision. Alternative B is the proposed alternative in this DSEIS. The proposed alternative would revise the 1980 GMP by increasing food service seating, slightly reducing the number of overnight lodging rooms, and changing the mix of room types.

We have rated this DSEIS as EC-2 -- Environmental Concerns-Insufficient Information (see enclosed "Summary of Rating Definitions and Follow-Up Actions"). Our rating reflects our concerns regarding the proposed project's potential impacts to air and water quality, as well as the need for additional information regarding this project's connection with other related foreseeable future actions, existing and projected air quality impacts, and impacts to water quality.

We appreciate the opportunity to review this DSEIS. Please send a copy of the Final Supplemental Environmental Impact Statement (FSEIS) to this office at the same time it is

Letter 7

Printed on Recycled Paper

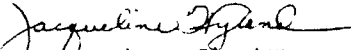
COMMENTS

RESPONSES

2

officially filed with our Washington, D.C., office. If you have any questions please call me at (415) 744-1015 (FTS 484-1015), or have your staff contact Jeanne Geselbracht, Office of Federal Activities, at (415) 744-1576 (FTS 484-1576).

Sincerely,


Deanna M. Wieman, Director
Office of External Affairs

Enclosures

001137
92-015

COMMENTS

RESPONSES

Yosemite Concession Services Plan
Draft Supplemental EIS
EPA Comments February, 1992

NEPA Issues

The 1980 General Management Plan (GMP) called for implementation of a host of activities to "perpetuate the natural splendor of Yosemite..." (GMP, page 1). These activities included reducing lodging rooms and food service seating in the Valley, removing 1,000 parking spaces from the Valley, redirecting development to the periphery of the park and beyond, and reducing congestion and improving air quality by restricting automobiles and eventually eliminating them from the Valley. The actions called for in the GMP were to have been implemented over approximately ten years. The DSEIS acknowledges that many of these actions have not been implemented. In fact, between 1980 and the present, the number of both lodging rooms and food service seats in the Valley have been increased rather than reduced. It is unclear why. In addition, it is unclear from the DSEIS whether some other actions have been successfully implemented, such as reduced parking spaces, other automobile restrictions, or improvements in air quality.

7a

In light of the fact that the original time period covered by the GMP has lapsed, we suggest that the National Park Service (NPS) provide for an extension of the GMP. This would effectively connect this and other forthcoming supplemental or tiered EISs back to the GMP.

7b

Inasmuch as several 1980 GMP activities which would have protected the environment were not implemented, we recommend that this FSEIS discuss means to ensure successful implementation of the actions currently proposed. For example, the FSEIS could discuss time schedules, priorities, and financing related to the currently proposed actions and related foreseeable future actions. The discussion should include the estimated time period for which this SEIS would be applicable. We believe that this information would enhance the SEIS as a public disclosure and planning document.

According to the DSEIS, the Yosemite Housing Plan DSEIS is forthcoming. Furthermore, the DSEIS states that changes in air quality resulting from changes in transportation patterns "will be examined in a transportation study, which also will address the relative impacts that private vehicles and buses have on air quality" (page 67). Pursuant to the Council on Environmental Quality's Regulations for Implementing the Procedural Provisions of NEPA (40 CFR 1508.25), NPS should assess in a single NEPA document the cumulative impacts of actions affecting the same resources and having common timing. It thus would have been

7a

See response 3c.

7b

The final document discusses the means of implementation through funding under the new concession contract or, possibly, with appropriated funds. Full implementation of all action items specified in the Concession Services Plan cannot be ensured in light of the fact that no funding sources are guaranteed to be sufficient during any one contracting period. Also see response 1b.

COMMENTS

RESPONSES

Yosemite Concession Services Plan
Draft Supplemental EIS
EPA Comments February, 1992

appropriate to evaluate this proposal in the same document as similar actions such as the Housing Plan and changes to the park's transportation system. We understand that the September, 1993, expiration date for the current concessions contract was a factor in NPS's decision to prepare an EIS for the concession plan at this time. We believe, however, that related forthcoming and planned supplemental NEPA documents should have been scheduled so that their activities could all be evaluated in a single EIS. We urge NPS to plan accordingly for future actions.

Pollution Prevention

EPA believes that the magnitude of the proposed project presents a significant opportunity for effective implementation of the Pollution Prevention Act of 1990 (42 U.S.C. 13101) (PPA). The PPA states that:

"pollution should be prevented or reduced at the source whenever feasible; pollution that cannot be prevented should be recycled in an environmentally safe manner, whenever feasible; pollution that cannot be prevented or recycled should be treated in an environmentally safe manner whenever feasible; and disposal or other release into the environment should be employed only as a last resort and should be conducted in an environmentally safe manner."

According to the Council on Environmental Quality, pollution prevention refers to the application of decisions or techniques that avoid or minimize "undesirable changes in the physical, chemical or biological characteristics of our air, land, and water that may or will harmfully affect human life or that or other desirable species, or industrial processes, living conditions, or cultural assets; or that may or will waste or deteriorate our raw material resources."¹

Examples of pollution prevention measures include energy and water conservation devices and strategies for new commercial and lodging units; mass transit and/or alternative transit systems; and source reduction of hazardous materials and construction waste in new developments. This last example would not only decrease the need for solid waste disposal capacity, but reduce nonpoint source pollution in the groundwater and surface water in the park as well. We commend NPS's current pollution prevention

¹ From the Council on Environmental Quality's (CEQ) 21st Annual Report (p. 81); CEQ, in turn, credits the National Academy of Sciences, National Research Council for the definition.

COMMENTS

RESPONSES

Yosemite Concession Services Plan
Draft Supplemental EIS
EPA Comments February, 1992

efforts in the park and encourage NPS continue this commitment by seeking innovative pollution prevention strategies in the future.

Air Quality

Sources of air pollutants in the park include motor vehicles, boilers, commercial operations, campfires, fireplaces, and prescribed fires. In addressing the affected environment, the FSEIS should provide existing air quality data for those pollutants that are monitored in the park and discuss any trends that have occurred since the 1980 GMP was approved. In addition to the pollutants that are currently monitored, we recommend that NPS also monitor carbon monoxide concentrations at appropriate locations such as busy intersections.

The DSEIS states that a transportation study would be required to quantify effects of the proposed action on air quality. The FSEIS should include the results of any transportation studies that have been conducted by NPS for Yosemite, as well as discuss any current plans NPS has for conducting a park-wide transportation study and environmental impact analysis. The document also states that the proportion of vehicle-produced air pollutants attributable to visitors using concession facilities cannot be separated at this time from pollutants attributable to visitors in general (page 67). The FSEIS should, nevertheless, discuss the potential cumulative impacts to air quality resulting from the proposal and other ongoing and/or foreseeable future actions.

Water Quality

EPA commends NPS for its decision to remove structures from the 100-year floodplain. We believe this action would reduce risks to life and property and improve water quality and other floodplain values. However, not all structures would be removed from the floodplain. According to the DSEIS (page 65), "[i]n cases where feasible alternative sites are not available out of the floodplain, mitigation and warning measures are required, and a statement of findings must be developed and approved by the director of the National Park Service." The FSEIS should clarify what criteria NPS used in determining the infeasibility of alternative sites out of the floodplain to justify maintaining numerous existing structures within the floodplain. Furthermore, the FSEIS should indicate whether this statement of findings has been developed and approved by the NPS director.

Water demand can exceed supply during dry summer months at Wawona (DSEIS, page 46) and result in degradation of water quality in

7c The final document has been modified to include air quality data in an appendix. The Yosemite air-quality monitoring program was initiated in 1980. The National Park Service is following EPA protocols. Several more years of monitoring will be necessary before trends can be identified.

7d See response 2b.

7e Cumulative effects on air quality relating to the proposal are discussed in the final supplemental EIS. The text is based on best available information.

7f The final supplemental EIS contains an expanded discussion of the application of NPS floodplain guidelines and clarifies criteria used to determine feasibility of nonfloodplain alternative sites. The approved statement of findings appears as an appendix to this document. It recognizes that the structures have been in their present locations for many years, that the park has a flood plan to minimize harm to life and safety, and that floodproofing of structures and other appropriate mitigation of potential flood damage would be undertaken.

COMMENTS

Yosemite Concession Services Plan
Draft Supplemental EIS
728 Comments February, 1992

7g

the South Fork of the Merced River. Yet NPS proposes to construct 41 new lodging units with baths, with a projected additional water usage rate of 8,200 gallons per day. The DSEIS states that water constraints will be addressed in a development concept plan. We urge NPS not to defer this issue, but rather address it in the FSEIS. Given the projected increase in water demand at Wawona, the FSEIS should indicate, under various flow regimes for the Merced River, the likelihood of demand exceeding supply as well as the potential impacts to beneficial uses of the river.

7h

The GMP called for 43 percent of the lodging units in the park to include baths. The proposed alternative calls for 65 percent of the units to include baths. The FSEIS should discuss whether projected water usage rates for lodgers in units with baths would be greater than those for lodgers in units without baths (i.e., for lodgers who use public baths). If so, we suggest that NPS seriously consider the merit of reducing the number of units with baths, especially in developments such as Wawona where the demand for water may exceed supply.

RESPONSES

7g

The final proposal has been modified to eliminate additional lodging at Wawona. Water use at Wawona is constrained at present by the availability of river water for diversion into the water system. Other sources for Wawona water are available, and the National Park Service will consider developing those sources based on the needs assessment in the development concept plan.

The water use estimates in the draft supplemental EIS were in error. New water use estimates appear in the final document; the methodology for calculating water use appears in the water use appendix. The final document also includes an additional assessment of water demand at Wawona under various flow regimes and potential impacts to beneficial uses of the river.

7h

Water use estimates have been incorporated into the final supplemental EIS, and the methodology for calculating water use appears in an appendix. The final proposal does not include construction of any additional lodging at Wawona.

COMMENTS

RESPONSES



United States Department of the Interior

FISH AND WILDLIFE SERVICE
Fish and Wildlife Enhancement
Sacramento Field Office
2800 Cottage Way, Room E-1803
Sacramento, California 95825-1846



In Reply Refer To:
1-1-92-I-417

February 28, 1992

Memorandum

To: Superintendent, Yosemite National Park, California

From: Field Supervisor, Sacramento Field Office
Sacramento, California (SFO) *Way S. [Signature]*

Subject: Comments on the Supplemental Environmental Impact Statement,
Concession Services Plan, Yosemite National Park.

The Fish and Wildlife Service (Service) has reviewed the subject document (document) and submits the following comments. Pursuant to the requirements or guidelines of the Fish and Wildlife Coordination Act, Endangered Species Act of 1973 as amended (ACT) and National Environmental Policy Act (NEPA), we request that our remarks become a permanent part of the record associated with the subject project.

GENERAL COMMENTS

The two project implementation alternatives ("A" and "B") call for the continuation of concession services at Yosemite National Park, California. Alternative A provides for the continuation of concession services as defined and described in the 1980 General Management Plan (GMP). Alternative B, the proposed action, would implement the GMP concession plan with revisions. Alternative B would result in greater reductions in lodging facilities and merchandise services. Stables, kennels, skiing facilities, golf courses, and food services would be retained under both alternatives.

At least two federally listed endangered species are reported as being present in Yosemite National Park, the peregrine falcon (*Falco peregrinus*) and the bald eagle (*Haliaeetus leucocephalus*). The document reveals that the former species "...could be affected by concession activities..." (page 41). Several other sensitive species, including the State-endangered willow flycatcher (*Empidonax traillii*), are listed as being present in the park (pages 41-43). Jurisdictional wetlands or waters of the United States occur in at least three sites (including the Badger Pass ski area). Sensitive habitat types within the park include black oak woodland, willow riparian woodland and meadows. Included in the document are various proposals to mitigate or minimize the loss of sensitive wildlife habitats.

Letter 8

COMMENTS

RESPONSES

In general, the Service concludes that the document has adequately disclosed project-related impacts and addressed many of our concerns and expectations pertaining to preservation of public fish and wildlife resources that are present in or near proposed project sites throughout the park. The Service further concludes that the removal of some facilities mandated by the proposed action and subsequent revegetation or restoration efforts should result in the eventual enhancement of select public fish and wildlife resources and habitats. However, the Service has concerns regarding: 1) direct or indirect effects of both alternatives on the peregrine falcon, a federally-listed species, 2) the proposed, inadequately mitigated commencement or continuation of activities that impact listed or sensitive wildlife species, and 3) the proposed indirect and cumulative effects of each alternative on listed and sensitive resources and the human environment.

Accordingly, the Service offers the following to substantiate its conclusions and recommendations and asks that each of these be included and addressed in the Final Supplemental Environmental Impact Statement. The specific comments appearing below will hopefully eliminate or minimize project impacts to public fish and wildlife resources and assist you in complying with applicable, Federal statutes and anticipating select Federal permit requirements.

SPECIFIC, PROJECT-RELATED IMPACTS TO PUBLIC FISH AND WILDLIFE RESOURCES

1. IMPACTS TO LISTED SPECIES.

The impact of rock climbers on peregrine falcon nesting should be closely scrutinized by the National Park Service. If the National Park Service determines that rock climbers may affect peregrines, formal consultation pursuant to 50 CFR 402 may be appropriate.

2. ACTION-RELATED IMPACTS TO SENSITIVE WILDLIFE SPECIES.

Although the proposed alternative specifies that the overall amount of wildlife habitat may increase subsequent to planned revegetation efforts (page 64), the planned operation of stables (e.g., White Wolf, old Curry dump site), the continued use of lodging and food concessions, the continued use of prescribed burns, and an increase in development at Tuolumne Meadows and White Wolf would result in impacts to an array of mammalian (page 65) and native bird species, including the State-listed willow flycatcher.

The Service maintains that concession or action-related direct or indirect impacts (e.g., habitat destruction, operation or maintenance activities, human presence, noise, lighting) will affect habitats in and well outside of the construction and facility areas. A potential impact to these and all other sensitive or listed species that may result from project-related activities, such as increased human presence and/or the conversion or degradation of habitats adjacent to the proposed project area, include an increased rate of depredation or nest parasitism of native bird species.

8a

The Park Service recognizes the potential for adverse effects on nesting peregrines and closes El Capitan to climbing in areas where falcon nests are seen between January 1 and August 4 each year. Parkwide supplementary climbing closures are enforced where active peregrine nesting is suspected. Yosemite National Park has an approved peregrine falcon management plan, and the park is a signatory to an interagency agreement among the U.S. Fish and Wildlife Service, the Forest Service, the Bureau of Land Management, and the California Department of Fish and Game regarding monitoring of peregrine falcon populations.

COMMENTS

For instance, human-induced increases in the food or feeding habitat for domestic or sylvatic predators (e.g., the common raven, *Corvus corax*, [feral] domestic animals, non-native rodents) and the brown-headed cowbird (*Molothrus ater*) almost certainly will result in impacts to sensitive or protected species. In particular, brood parasitism by the brown-headed cowbird has directly contributed to the decline of number of listed and sensitive species in the State of California, including the willow flycatcher and least Bell's vireo (*Vireo bellii pusillus*; State and Federal endangered).

The arrival and explosive increase in the number of brown-headed cowbirds in California has been the result of the perturbation, modification, or destruction of native habitats and the large-scale introduction of cattle and horses into the human environment. Similarly, it is clear that the existing and proposed modifications to the human environment in Yosemite National Park have created and will continue to create habitat and food for non-native predators and the brown-headed cowbird.

Although cowbirds were not recorded in Yosemite National Park until 1934, they are now a common species throughout much of the park and can easily be found at favorite feeding areas which include horse corrals, stables, campgrounds, picnic areas, and bird feeders. Although first detected at lower elevations, cowbirds have been detected at relatively high elevations (e.g., Tioga Pass) since 1961 or before. Radio-tracking studies in the Sierra Nevada have revealed that cowbirds may travel as much as seven kilometers between feeding and "breeding" areas. As is usual, cowbirds were easily detected in the park (e.g., Tuolumne Meadows corrals) during the 1991 breeding season.

Therefore, the Service suggests that these actions and project-related effects which impact any sensitive animal species be disclosed and mitigated to the maximum extent possible. One certain means of mitigation is to initiate a resource management plan that includes a cowbird abatement program. Fortunately, such plans have been developed and implemented successfully in locales throughout California and have significantly reduced the influence of non-native species and incidence of cowbird parasitism. The result is a reduction in the impact to sensitive and protected species, including the willow flycatcher and, more often, the least Bell's vireo.

Once abundant throughout most of the State, least Bell's vireos were recorded in high (and perhaps unprecedented) densities along the Tuolumne and Merced Rivers west of the park. Although the least Bell's vireo is now confined to southern California, recent management efforts have resulted in significant reduction in parasitism and decreases in disturbances to nesting vireos. As a result, this species' numbers and range have expanded significantly in recent years and riparian habitats have been rehabilitated. Because willow flycatchers frequently occur in the very same riparian woodland habitats that are occupied by least Bell's vireos, both species benefit from planned conservation and management measures.

Accordingly, the Service recommends that a management program be undertaken to minimize concessions-related or concessions-induced impacts to select mammalian species, the willow flycatcher and a large number of other local breeding bird species. The Service believes that such a mitigation plan

RESPONSES

8b

These actions, which are a parkwide issue beyond the scope of the concession services plan, are addressed in the draft *Yosemite Resource Management Plan*. The park will continue to consult and cooperate with the USFWS to seek methods of protecting all sensitive species, including development of plans for effective mitigation of effects on sensitive wildlife species from projects and cumulative impacts. Protection of endangered species, including monitoring of populations and habitats of sensitive species, is addressed in the draft *Yosemite Resource Management Plan*.

The Park Service will continue to review the appropriateness of developments such as campgrounds, picnic areas, and stables that provide habitat for brown-headed cowbirds. The final proposal calls for removal of the White Wolf stables. The park will take appropriate measures to mitigate the impacts of cowbirds on willow flycatchers and other local breeding bird species to the greatest extent possible.

There are no known records of the occurrence of the least Bell's vireo in Yosemite.

8c

The development at White Wolf and Tuolumne Meadows described in the draft document involves replacement of existing structures. The capacity of the Tuolumne Meadows food service facilities would be increased by 30 seats. There would be no increase in lodging capacity in either locality. It is not anticipated that these changes in concession services would have significant impacts on sensitive mammals at White Wolf and Tuolumne Meadows. As stated in the final supplemental EIS, a development concept plan with additional environmental compliance would be undertaken prior to design and construction. The areas would be surveyed for the presence of sensitive species during the planning phase.

Management of threatened, endangered, and sensitive species is described in the draft *Yosemite Resource Management Plan*. The park is actively working to reduce adverse impacts and enhance the populations of sensitive species.

COMMENTS

RESPONSES

should, at a minimum: 1) identify the agencies or parties ultimately responsible for the plan's success and implementation; 2) contain clear language and stipulations pertaining to enforceable performance standards and provisions for routine evaluations by the National Park Service, the Fish and Wildlife Service and other State and Federal permitting authorities; 3) provide for the frequent monitoring of the listed or sensitive species and their respective habitats; 4) require the timely removal of brown-headed cowbirds, all problematical, predatory species, and all noxious, non-native habitat constituents; 5) provide, to the extent possible, for reductions in the amount of food or foraging habitat and access that is intentionally or unintentionally provided to all such brood-parasitic or predatory species; 6) provide contingency measures to counter possible decreases in sensitive mammal populations, and 7) initiate the legal and operational means to address or mitigate any detectable or potential impacts to listed or sensitive species (including all of those listed elsewhere in this document) that result from the construction or operation of concession services.

3. CUMULATIVE IMPACT ANALYSIS.

The impacts of the proposed action should be considered in concert with the real and reasonably foreseeable impacts of other local projects pursuant to the requirements of NEPA. The Service suggests that other approved and proposed local (e.g., United States Forest Service, El Portal, Fish Camp) management plans or projects should be, at a minimum, considered in an analysis of cumulative, perhaps significant impacts, on biotic resources in the project area and environs, including sensitive bird and mammal species. This is especially true of widespread land use and management practices that have enabled brown-headed cowbirds to become established throughout the Sierra Nevada which has caused severe population declines to native birds such as the willow flycatcher. That cowbird distribution and abundance is closely associated with the concession program indicates that direct and indirect impacts, only vaguely alluded to under the "cumulative effects" discussion, should have been addressed in substantially greater detail under "Impacts on the Natural Environment".

In summary, the Service wishes to thank the National Park Service for selecting on action alternative that may result, overall, in an eventual increase in public fish and wildlife values. However, we remain concerned that project-related and cumulative impacts to sensitive wildlife species and habitats will almost certainly occur in the absence of an effective mitigation plan or plans. The Service is committed to assisting you in devising such a plan and to avoid impacts to federally-listed species. Please contact Peter Sorenson of my staff at 916-978-4613 should you desire assistance or clarification of the issues addressed in our comments.

8d

The National Park Service recognizes that land management activities on adjacent lands may affect biotic resources within Yosemite National Park. Cumulative impacts resulting from activities on adjacent land have been addressed in the final document. The Park Service will continue to work with other land management agencies to reduce adverse impacts on park resources from land use practices on adjacent lands.

8d

COMMENTS

RESPONSES

cc: Assistant Regional Director (FWE), FWS, Portland, OR
Field Supervisor (FWE), FWS, Laguna Niguel, CA
U.S. Department of the Interior, Regional Environmental Officer, 450
Golden Gate Ave., Rm., 14444, Box 36098, San Francisco, CA 94102
(Attn: Patricia S. Port)
Yosemite Association, P.O. Box 230, El Portal, CA 95318
Yosemite Foundation, 155 Montgomery St., Suite 1104, San Francisco, CA
95318
National Audubon Society, 555 Audubon Place, Sacramento, CA 95825
National Sierra Club, 730 Polk ST., San Francisco, CA 94109

MONUMENT OFFICE
STATE CAPITAL, YOCAL 4070
SACRAMENTO, CA 95833
916-445-7555
DISTRICT OFFICE
1800 BARTLETT BLVD
SUITE 200
LOS ANGELES, CA 90015
213-476-1885
LYNNETTE STEVENS
CHIEF OF STAFF
COLLEEN BEASLEY
ADMINISTRATIVE ASSISTANT



California State Senate

HERSCHEL ROSENTHAL

22ND SENATORIAL DISTRICT

CHAIRMAN

SENATE COMMITTEE ON ENERGY AND PUBLIC UTILITIES

COMMITTEES

CHAIRMAN:
ENERGY AND PUBLIC UTILITIES
SENATE COMMITTEE ON MOTION PICTURE
TELEVISION, COMMERCIAL, AND
RECREATIONAL INDUSTRIES
JOINT COMMITTEE ON ENERGY REGULATION
AND THE ENVIRONMENT

MEMBER:
HEALTH AND HUMAN SERVICES
FORCES AND PUBLIC SAFETY MANAGEMENT
BUSINESS AND PROFESSIONS
ELECTRONIC AND RECREATION
GOVERNMENTAL ORGANIZATION
INDUSTRIAL RELATIONS

SUBCOMMITTEES
CABLE TELEVISION
HEALTH CARE COST MANAGEMENT
WORKERS IN THE WORKFORCE
MENTAL HEALTH, DEVELOPMENTAL DISABILITIES
AND DEVIANT BEHAVIOR

MEMBER:
EARLY CHILDHOOD EDUCATION
AGRICULTURE
CALIFORNIA MOTION PICTURE
COUNCIL ADVISORY COMMITTEE
CALIFORNIA HERITAGE PRESERVATION
COMMISSION

Letter 9

February 27, 1992

Mr. Michael Finley
Superintendent
Yosemite National Park
P. O. Box 577
Yosemite National Park, CA 95389

Dear Mr. Finley:

Thank you for this opportunity to comment on the proposed Concession Services Plan (CSP) for Yosemite National Park. Yosemite is truly one of our most magnificent national treasures, and we welcome the chance to speak in support of the protection and preservation of this spectacular resource.

At this critical juncture in Yosemite's history, we believe that it is imperative to strictly adhere to the provisions of the 1980 General Management Plan (GMP) for the Park. Unfortunately the proposed Concession Services Plan contrasts sharply with the GMP. The deficiencies in the CSP could jeopardize the long-term resiliency of many of the Park's natural resources and make it difficult to achieve the vision of a Yosemite which can accommodate members of the public but is not destroyed by their presence.

The GMP established a detailed plan to reduce traffic congestion and overcrowding in Yosemite Valley, prevent further significant development in the Park, and relocate certain facilities in the Valley--such as staff housing, office space and warehousing, which do not directly relate to the public enjoyment of Yosemite--outside of the Park.

COMMENTS

Mr. Michael Finley
February 27, 1992
Page 2

9a

However, the Concession Services Plan calls for the construction of 299 new motel units and would retain the Dagnan's building and concessionaire's warehouse in the Valley; the concessionaire's headquarters and employee housing within the Park; and shops for clothing, sports equipment and gift sales at the Yosemite Village Store--all contrary to the provisions of the 1980 GMP.

9b

Moreover, the Concession Services Plan proposes to increase the cost of an overnight stay by eliminating 559 low-cost units (the GMP calls for the removal of only 186), replacing them with medium-cost units. This action would restrict overnight stay in the park to only those who could afford the increased prices. Yosemite is a public park, and the opportunity to spend a night should be affordable to a broad-based population.


9c


Finally, we are concerned with traffic congestion in Yosemite. The GMP seeks to replace all private automobiles entering the park with public transportation by the year 2000. Implementation of this policy will not only substantially reduce air pollution and traffic congestion in Yosemite Valley, it will enable the Park Service to return most parking lot space to meadow. While the Concession Services Plan does not address this issue, it should be a priority for the Park Service to encourage its aggressive implementation.

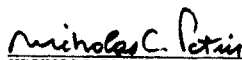
9d

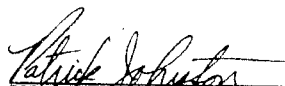
Therefore, we urge you to take the appropriate steps to fully implement the 1980 General Management Plan by the year 2000. This should include the rejection of any language in the Concession Services Plan which does not strictly adhere to the provisions of the GMP. The future of Yosemite National Park depends on the decisions we make today. This precious natural resource must be the beneficiary of your most diligent efforts to preserve it for future generations.

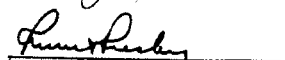
Respectfully,



HERSCHEL ROSENTHAL
Senator, 22nd District


ALFRED ALQUIST
Senator, 13th District


NICHOLAS PETRIS
Senator, 9th District


PATRICK JOHNSTON
Senator, 5th District


ROBERT PRESLEY
Senator, 36th District


CECIL GREEN
Senator, 33rd District

RESPONSES

9a

The final proposal includes new cottage units rather than motel units, and clothing and sporting equipment sales would be moved to Curry Village. As stated in the final document, the location of the concession housing and headquarters will be addressed in the draft *Yosemite Valley Housing Plan/Supplemental EIS*. Also see responses 1a and 3c.

9b

The GMP calls for a full range of lodging. Such a range was provided in the draft concession services plan, with an increased percentage of rooms proposed at the "standard or midscale" level, and a reduction in the number of tent-cabins and rooms without baths. This proposed change was based on typical national lodging demands. In response to public comment, the final proposal has been modified to retain 150 rather than 100 tent-cabins at Curry Village. Also, all new cabins and cottages would be developed as economy units. This change would result in more low-cost rooms than proposed in the draft document (65% of rooms would be in the economy/rustic price range as opposed to 52% in the draft). The final document has been modified to include these data; see "Effects of Visitor Use on Concessions."

9c

See response 2b.

9d

See responses 1a and 1b.

COMMENTS

RESPONSES

Mr. Michael Finley
February 27, 1992
Page 3

cc: Congressman Bruce Vento
James Ridenour

COMMENTS

RESPONSES

The Resources Agency

Pete Wilson
Governor



of California

Douglas P. Wheeler
Secretary

California Conservation Corps • Department of Boating & Waterways • Department of Fish & Game • Department of Forestry & Fire Protection • Department of Parks & Recreation • Department of Water Resources
May 8, 1992

U. S. Department of the Interior
National Park Service
ATTN: Superintendent
P. O. Box 577
Yosemite National Park, CA 95389

Dear Sir:

The State has reviewed the Draft Environmental Impact Statement, Concession Services Plan, Yosemite National Park, Mariposa and Tuolumne Counties, submitted through the Office of Planning and Research.

We coordinated review of this document with the State Lands Commission, the California Integrated Waste Management Board, the Central Valley Regional Water Quality Control Board, and the Departments of Conservation, Fish and Game, and Transportation.

None of the above-listed reviewers has provided a comment regarding this document. Consequently, the State will have no comments or recommendations to offer.

Thank you for providing an opportunity to review this project.

Sincerely,

for Carol Whiteside
Assistant Secretary,
Intergovernmental Relations
Administration/Finance

cc: (See attached list.)

The Resources Building Sacramento, CA 95814 (916) 653-5636 FAX (916) 653-8102

California Coastal Commission • California Tahoe Conservancy • Colorado River Board of California
Energy Resources Conservation & Development Commission • San Francisco Bay Conservation & Development Commission
State Coastal Conservancy • State Lands Commission • State Reclamation Board

♻️ Printed on recycled paper

Letter 10

COMMENTS

RESPONSES

U. S. Department of the Interior
May 8, 1992
Page Two

cc: National Park Service
Denver Service Center
ATTN: Aida Parkinson
Western Team
P. O. Box 25287
12795 W Alameda Parkway
Denver, CO 80225-0287

Office of Planning and Research
1400 Tenth Street
Sacramento, CA 95814
(SCH 92044009)

COMMENTS



LARRY A. ROTELLI

Supervisor First District

TUOLUMNE COUNTY
ADMINISTRATIVE CENTER
2 SOUTH GREEN STREET
SONOMA, CALIFORNIA 95370
PHONE (209) 533-5521
HOME (209) 532-3557

February 28, 1992

Mr. Michael V. Finley, Superintendent
Yosemite National Park
National Park Service
P.O. Box 577
Yosemite National Park, CA 95389

Dear Superintendent Finley:

11a

As a member of the Tuolumne County Board of Supervisors, not having the time to get Board approval for action, I am asking personally for the Park Service to order an independent economic impact statement prior to adoption of the pending Draft Concession Services Plan.

I request this so as to be able to more fully understand the economic impacts to Tuolumne County which would ensue from adoption of the Draft Concession Services Plan.

11b

Moreover, I request, prior to adoption of the Draft Concession Services Plan, that the pending housing element, transportation element and resources management element be provided for analysis and discussion by the Tuolumne County Board of Supervisors.

Thanking you for your consideration,

Sincerely,

Larry A. Rotelli
LARRY A. ROTELLI
Supervisor, First District

RESPONSES

Letter 11

11a

The National Environmental Policy Act (NEPA) does not require a separate economic impact statement. Economic impacts are addressed in the "Environmental Consequences" chapter of the plan.

11b

The Tuolumne County Board of Supervisors are on the mailing list for all park planning documents.

COMMENTS

RESPONSES



ZEV YAROSLAVSKY
COUNCILMAN
FIFTH DISTRICT

COMMITTEES:
CHAIRMAN,
BUDGET AND FINANCE

MEMBER
COMMUNITY REDEVELOPMENT AND HOUSING
RULES AND ELECTIONS

City Council
of the
City of Los Angeles
City Hall
80012

318 CITY HALL
200 16 SPRING STREET
LOS ANGELES, CA 90012
800-80115
FAX: 807-7408
DISTRICT OFFICES:
1140 SO. ROBERTSON BLVD.
LOS ANGELES, CA 90088
1510 37th STREET
FAX: (310) 880-1774
82310 VENTURA BLVD.
SHERMAN OAKS, CA 91423
(818) 868-8083
SAP: (818) 798-8210

January 29, 1992

Superintendent Michael V. Finley
Yosemite National Park
P.O. Box 577
Yosemite, California 95389

Dear Superintendent Finley:

I am writing to express my concerns over the National Park Service's draft Yosemite Concession Services Plan.

Much of the controversy surrounding the future of Yosemite Valley was thought to have been resolved with the adoption of the 1980 General Management Plan (GMP). The GMP is a compromise between all interested parties, balancing resource protection with commercial development. As such, all plans for providing future services in the valley must be consistent with what is contained in the GMP.

I commend the National Park Service for allowing the public to participate in the development of the Yosemite Concession Services Plan.

As a member of the Los Angeles City Council, and a frequent visitor to Yosemite, I must express my strong opposition to any development activities which increase the number of lodging units above that which was adopted in the General Management Plan.

Throughout my lifetime, whether as an adolescent or today as the father of two young children, I have enjoyed a variety of the lodging and services available in the valley and other areas of the park. Although the overwhelming demand for lodging and its limited availability has often altered my vacation plans, I have a deep appreciation of the opportunity to enjoy Yosemite's natural splendor during off-peak months of the year.

Yosemite National Park is a resource that can be preserved for my children and their children's children. In Los Angeles we face many problems associated with a major metropolitan area, primarily related to the demand for housing, jobs, public services and various amenities. The solutions to these problems are often complicated and sometimes unfairly resolved because we don't control the land on which all these activities must be located. In contrast, the National Park Service, on behalf of every American citizen, is the owner and

Revised as per the report

Letter 12

12a The number of proposed units in the final proposal is smaller than the number proposed in the 1980 GMP.

12a

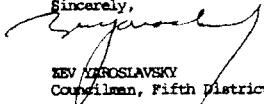
COMMENTS

RESPONSES

-2-

caretaker of all the land in the Yosemite Valley. You have the support of this citizen and my constituents to implement meaningful reforms in transportation, employee housing, concession activities and programs that will bring Yosemite's services into compliance with the 1980 General Management Plan.

Sincerely,



KEN KOZLOWSKY
Councilman, Fifth District

ZY:mje

COMMENTS

RESPONSES

MONO COUNTY LOCAL TRANSPORTATION COMMISSION

HCR 79 BOX 221
MAMMOTH LAKES, CA. 93546
619-934-7584 FAX 619-934-3368

P.O. BOX 8
BRIDGEPORT, CA. 93517
619-932-5217 FAX 619-932-7145

February 10, 1992

Michael V. Finley
Superintendent, Yosemite National Park
P.O. Box 577
Yosemite National Park, CA 95389

Dear Mr. Finley:

Thank you for the opportunity to review the Draft Concession Services Plan/Supplemental EIS for Yosemite National Park. It is the position of the Mono County Local Transportation Commission that the draft does not adequately address transportation impacts, and we disagree with the document's position that regional transportation issues are beyond the scope of the EIS supplement.

As you are aware, the Mono County LTC is participating in a regional transit study with the Park and other counties in the region. Due to the proposed deviations of the Concession Plan from the Park's General Management Plan, we believe that the Concession Plan will have regional transportation implications, and that these implications should be addressed in the EIS Supplement, or through the transit planning effort currently underway. Our Commission is particularly concerned with Plan impacts on the gateway community of Lee Vining, and other nearby communities - such as June Lake and Mammoth Lakes - which provide overnight accommodations for Yosemite visitors. It is suggested that the concession planning process be integrated with the other planning efforts of the Park, such as transportation and housing planning, to ensure a comprehensive and internally consistent final product.

Your consideration of these comments is appreciated.

Sincerely:



Michael M. Blazenski
Chairman
Mono County Local Transportation Commission

Letter 13

13a See response 2b.

13b The sections about impacts on local economies and the affected environment have been revised in the final document to include Mono County. The National Park Service recognizes the relationship of the park and its activities to the gateway communities. Lodging accommodations and related services have expanded in the region as a natural response to increased demand at a time when no significant changes were made in lodging in the park.

The changes in services and facilities of the proposal will occur gradually over several years in conjunction with more detailed planning. There may be incremental growth as a result of removal of park lodging. The counties have the authority, responsibility, and capability to control their own growth, as they have done over the past ten years. The adjacent communities will be consulted on specific actions in more detailed planning and design stages.

COMMENTS

RESPONSES

MONO COUNTY PLANNING DEPARTMENT

HCR 79 BOX 221
MAMMOTH LAKES, CA. 93546
619-934-7584
FAX 934-3368

P.O. BOX 8
BRIDGEPORT, CA. 93517
619-932-5217
FAX 932-7145

January 29, 1992

Michael V. Finley
Superintendent, Yosemite National Park
P.O. Box 577
Yosemite National Park, CA 95389

Dear Mr. Finley:

Thank you for the opportunity to review the Draft Concession Services Plan/Supplemental EIS for Yosemite National Park. Upon review of the Draft, the Mono County Board of Supervisors has expressed concern that the planning and environmental analysis process for the Concession Services Plan has apparently been fragmented, and consequently is not sufficiently addressing related transportation and housing issues - two major concerns of Mono County.

The Draft indicates that regional transportation issues are beyond the scope of the document, and also states that the Yosemite Housing Plan/Draft Supplemental EIS will be forthcoming. In order to adequately assess the impacts of the Draft Concession Services Plan, it is requested that regional transportation and housing issues be addressed concurrently with, and in conjunction with, the Concession Services Plan. Specifically, it is requested that the implications of the Draft Plan on housing and transportation in Mono County, particularly the gateway community of Lee Vining, be assessed in the Plan and EIS Supplement.

Thank you for considering these comments; Mono County may submit additional comments prior to the comment deadline. Please give me a call if you have questions concerning this matter.

Sincerely:



Scott Burns
Planning Director

cc: Mono County Board of Supervisors

Letter 14

14a See response 2b.

14a

COMMENTS

RESPONSES



Central California Council, American Youth Hostels

January 10, 1992

Superintendent Michael Finley
Yosemite National Park
P.O. Box 577
Yosemite, CA 95389

Dear Superintendent Finley:

On behalf of the Central California Council Inc. of American Youth Hostels Board of Directors, we are very interested in the new plan for Yosemite National Park.

Yosemite National Park is in our Council's jurisdiction and we have many travelers in our International Youth Federation of Hosteling that visit this area every year.

For example, a new home hostel was chartered just a year ago in Merced, 80 miles from Yosemite, and had an astounding number of 817 overnights in its first year! This next year we expect well over 1000 visitors, of which nearly 95% are foreign travelers.

We believe that a facility chartered by our Council to be an American Youth Hostel would be ideal in order to provide a safe, educational environment for travelers of all ages.

If there is any possibility of this becoming a reality, please call me. I live in Merced and my work telephone number is (209) 385-6680 and home, (209) 722-6101. I would be very interested in talking to you.

Thank you for this opportunity.

Sincerely,

J. Sorge
Janice J. Sorge
President

enclosure 2

cc: Yosemite Restoration Trust
National Park Service

15a

Letter 15

- 15a There are no appropriate locations in Yosemite Valley for a large new building for this purpose, nor are there any existing buildings that lend themselves to conversion. Hostels were not proposed in the GMP.

COMMENTS

LOS ANGELES AUDUBON SOCIETY established 1910

7377 Santa Monica Boulevard
Plummer Park
Los Angeles, California 90046

(214) 836-0202 faxed information (214) 874-1414



February 5, 1992

Superintendent Michael Finley
Yosemite National Park
P.O. Box 577
Yosemite, Calif 95389

Dear Mr Finley:

The Los Angeles Audubon Society is emphatically opposed to the recent draft Concession Services Plan which, we feel, will serve to increase development in Yosemite Valley.

For years the Park Service itself, as well as many of us who love Yosemite, have been saddened and disturbed by the over-commercialization of a magnificent park.

The original General Management Plan of 1980 called for moving concessioner housing and headquarters outside the park at El Portal. We support this sensible idea - which the new proposal does not endorse.

A national treasure like Yosemite should not be a replica of a busy city mall. We object to the widespread sale of clothing, sports equipment and kitschy knickknicks. The fire fall from Glacier Point years ago gave an artificial atmosphere to Yosemite that simply did not belong there and it was a great day when it was discontinued. Similarly, every effort must be made to de-emphasize the artifacts of urban life in the Valley so the visitor will become more aware of an outdoor experience.

The Service's proposal to build 299 expensive cabins and motels in the Valley is another device that will destroy the image of the robust outdoor-oriented America projected by Teddy Roosevelt and John Muir. The idea of eliminating 599 low-cost tent cabins and housekeeping camps adds to the perception that visiting Yosemite is an elite affair and the less advantaged need not apply.

The horror stories appearing in the press for years about air pollution in the Valley are all too true and must be addressed. The Park Service owes the public the resolve to eliminate this unsightly and unseemly hazard. As everywhere in our cities the automobile

RESPONSES

Letter 16

16a The plan does endorse moving concessioner headquarters outside Yosemite Valley. The location of concession housing and headquarters will be addressed in the draft *Yosemite Valley Housing Plan/Supplemental EIS*.

16b See response 9b.

COMMENTS

RESPONSES

LOS ANGELES AUDUBON SOCIETY

established 1930

7377 Santa Monica Boulevard
Plummer Park
Los Angeles, California 90046

(213) 875-0202 / telex information (213) 875-1318



-2-

is responsible for much of the smog and its effects. A plan must be developed that will eventually eliminate autos from the Valley.

The present concessioner has been entrenched in the park for many decades and has run a profitable enterprise. His activities have been directed to maximum profit, frequently without regard to their effect upon the natural values of the park. In considering the next concessioner, the sensitivity to those values should be in the forefront of that decision.

The 3500 members of Los Angeles Audubon would be much encouraged if the original philosophy of the General Management Plan were to be restored to the National Park Service.

Sincerely,

Sanford Wohlgenuth
Conservation Chair

16c See response 1c.

COMMENTS

RESPONSES



MESILLA VALLEY
AUDUBON
SOCIETY

PO BOX 3127 UPB LAS CRUCES NM 88003

February 3, 1992

Michael Finley, Superintendent
Yosemite National Park
P.O. Box 577
Yosemite, California 95389

Dear Mr. Finley:

The general management plan developed for Yosemite National Park back in 1980 had so much promise of needed change, we really had hoped by now that there would be some obvious relief from overdevelopment and over commercialization of this natural treasure. Unfortunately little of the plan has been implemented and now a new draft plan that ignores much of the earlier planning has been offered. A transportation system to replace automobiles on the valley floor, removal of offices and maintenance buildings and in general just a reduction in "people pressure" is long over due. We urge you to restore these major parts of the 1980 plan to your concession proposal, and enact them before the year 2000.

Sincerely,

Thomas H. Wootten
Conservation Chair

Letter 17

17a See responses 1a and 1b.

17a

COMMENTS



MT. DIABLO AUDUBON SOCIETY
P.O. BOX 53
WALNUT CREEK, CALIFORNIA 94596

MICHAEL V FINLEY, SUPERINTENDENT
YOSEMITE NATIONAL PARK
PO BOX 577
YOSEMITE, CA. 95389

DEAR MR. FINLEY: RE: Proposed Concession Services Plan

We are, in general disappointed with the draft concession Services Plan. We believe it imperative that ANY new concessionaire arrangement take fully into account, conditions we will be facing in future. California's population is and will be increasing in substantial numbers. That will mean Yosemite, the crown jewel in the park system will be MORE important then it has been up to now.

Proposals in the 1960 General Management Plan provided a somewhat acceptable balance between developed activities and natural uses of the park. Any plan which is finalized MUST follow those guidelines.

Concession leasee MUST be required to provide adequate, timely funding to cover the various items for which such organization will be responsible, once an agreement (contract) has been signed and approved.

18a

issues involving employee housing, transportation and resource management cannot just be "put off" till some later time. The time to ensure the leasee will do what has to be done is when the contract is drafted--adequate timetables, plans of action, funding and the like MUST be arranged for PRIOR to the acceptance of ANY leasee bid.

18b

18c

The building of new cabins, motel units et al cannot be justified, except on the basis that the leasee will have a more profitable operation. It is essential-Yosemite be maintained in a state with as much of it remaining "natural" as possible. The building of more units and not reducing employee

RESPONSES

Letter 18

18a

Housing, transportation, and resource management are separate issues beyond the scope of the concession services plan. The Park Service is actively working on these issues. The public will have an opportunity to review the draft *Yosemite Valley Housing Plan/Supplemental EIS* during the summer of 1992. The park resource management plan is available from the superintendent. Also see response 2b.

18b

It is not the purpose of the *Concession Services Plan* to provide mechanisms for funding. Concession contracting requirements will include adequate funding mechanisms to implement the concession action items of the plan and the GMP. Also see response 1b.

18c

Both the GMP (on page 79) and the *Concession Services Plan* indicate that we recognize that some facilities will be rehabilitated or rebuilt as they wear out or become obsolete. New facilities will be built when most or all of the economic usefulness of the replaced facility has been realized. Also see response 1a.

COMMENTS

RESPONSES

18d

RE issues of food service et al: In Australia, some tour operators provide picnic lunches as a major part of the tour service. Such requirements should be imposed on tour buses coming into the Park. Arrangements can be

18e

~~made to accommodate a reasonable number (certainly not larger than is now the case) in the Hotel, for regular dining. It should NOT be the policy to try to accomodate every day, the ever increasing number of people who will want to visit the park. To so do will eventually destroy the natural elements of the area. That must NOT be permitted.~~

We urge the proposed changes in building uses and locations as expressed in the General Management Plan be followed in ANY future arrangement. We urge this even if it means removal some some structures.

If concession activities have been permitted to increase pursuant to some authority and/or since the General Management Plan was produced, such should be halted forthwith. The situation should be returned to the former status.

18f

The existing Environmental analysis for Alternative B, (which is the preferred alternative) is not adequate or acceptable. The main features of Yosemite are it's natural elements, mountains, waterfalls, flora and faune-with the added important elements involving special avian species various animals etc. Any action proposed which would in any way adversely impact such MUST NOT be permitted. Failure to control adverse activities in future years will mean the park might well become a Disney Land, rather than a place of quiet scenic beauty, where nature abounds, and where all elements of nature can be enjoyed, studied and appreciated by the general public.

Yours very truly,


A. B. McNabney,
Vice President-Conservation

cc:Honorable Alan Cranston, Honorable John Seymour, Honorable George Miller, US Congressman, 7th Dist., Conservation Committee

18d

Provision of picnic lunches will be considered in the development of tour bus procedures. Also see response 3e.

18e

See response 3g.

18f

It is difficult to respond to this comment because specifics as to what information was lacking were not provided. In response to comments on the draft document from the Environmental Protection Agency, other agencies, organizations, and individuals, the final version has been revised. We believe sufficient environmental analysis has been provided to allow the National Park Service to make informed decisions between alternatives. Also see all responses to letters 7 and 8.

COMMENTS

RESPONSES

NAPA - SOLANO



AUDUBON SOCIETY

January 29, 1992
336 Benson Ave
Vallejo, CA 94590-3027
(707) 643-1287

Superintendent Michael V. Finley
P. O. Box 577
Yosemite National Park, CA 95389

Dear Mr. Finley:

I am writing to you today in behalf of nearly 1,000 members of the Napa-Solano Audubon Society (NSAS) as a member of it's Conservation Committee. We wrote to you when the General Management Plan (GMP) was developed in 1980.

We now understand that you have a draft Concession Services Plan (CSP) that was released on December 18, 1991. Unfortunately this draft plan does not take into consideration all the hard work that went into the GMP.

19a
19b
19c
19d
19e

NSAS recommends that no new buildings, roads, parking lots or other developments be made in Yosemite Valley per the GMP. Food service should be provided per the GMP and not designed for growth as the Valley is already to crowded to accommodate any more people. How are people going to have a quality experience at Yosemite National Park? An enlarged food service will only increase the amount of garbage on the Valley floor. Commercial tour buses must be properly regulated. The NPS should not shirk their responsibilities on this problem. We recommend that all buildings, programs, and structures be removed in accordance with the GMP of 1980. The time tables, deadlines, and funding mechanisms mentioned in the 1980 GMP should be used. Finally, transportation into the park, employee housing, and resource management issues must be addressed in the CSP and not deferred to some nebulous date.

Sincerely,

Robin Leong
Member Napa-Solano Audubon Society Conservation Committee

Letter 19

- 19a We believe you are mistaken. The GMP did call for construction: a new general store at Curry Village, additional lodging facilities at Wawona, a new gift and food service facility at Glacier Point, infrastructure throughout the park, administrative and maintenance facilities out of the valley, and employee housing. Replacement of worn facilities was allowed for, as was redesign of some areas (for example, Curry Village, Housekeeping Camp). Also see responses 1a and 3c.
- 19b See responses 3d and 3g.
- 19c Yosemite National Park is actively seeking ways to reduce the solid waste stream, such as examining how procurement procedures can be altered to reduce waste end products. The park is cooperating with the EPA on an integrated solid waste management demonstration project (ISWAP—Integrated Solid Waste Assessment Project). The park and concessioner cooperate in extensive recycling programs. Necessary park and concessioner maintenance operations to control and collect litter will continue to be improved.
- 19d See response 3e.
- 19e See responses 1b. and 3c.
- 19f See response 18a.

COMMENTS



National Audubon Society

Western Regional Office
555 AUDUBON PLACE, SACRAMENTO, CA 95825 (916) 481-5332

Testimony of John Borneman, Western Regional Representative
National Audubon Society
Regarding: Draft Concession Services Plan/Supplemental
Environmental Impact Statement for Yosemite National Park
Presented January 29, 1992 University of Southern California

Members of the Hearing Panel:

My name is John Borneman and I am a Regional Representative of the National Audubon Society's Western Region. Thank you for providing us with an opportunity to speak to you this evening. Audubon's Western Region includes California, Nevada, Washington, Oregon, and Guam. We have approximately 100,000 members in the region and 600,000 members nationally.

For many Americans, their first introduction to the most spectacular natural areas are provided by visiting our National Parks; areas of unmatched beauty and interest. These areas were set aside to not only preserve them but to give the visitor an opportunity to appreciate them for their natural amenities. However, a large number of those visitors are, to a large extent, deprived of the opportunity to learn about the subtleties of nature by having their senses assaulted by the very sights and sounds of the city that they thought they were getting away from when they entered a National Park. Still others expect to find the same commercial opportunities that they find at home because we have failed to educate them about the reasons for the existence of our National Park System. As commercial enterprises have become more and more a part of our everyday life it becomes increasingly important that the management of Yosemite National park does not continue to yield to the desires of these interests.

In light of the above the National Audubon Society calls upon the Park Service to do the following:

* Implement the major elements of the General Management Plan as adopted in 1980. That would accomplish the following goals:

1. No more construction of motel units in the Valley
2. Reduce commercialism in the Valley
3. Reduce crowding in Yosemite Village.

AMERICANS COMMITTED TO CONSERVATION

RESPONSES

Letter 20

20a See responses 1a and 19a.

20a

COMMENTS

RESPONSES

- * Implement the GMP by the year 2000. The time to act is NOW.
- * Require concessioners to present and implement a plan that would give the visitors more of an opportunity to appreciate the natural experience while reducing the commercial ambiance of the Valley and Yosemite Village.

I urge you to work to restore some of what has been lost in Yosemite National Park through the over-commercialism of that natural treasure.

Thank you.

COMMENTS

RESPONSES

Glenn Franklin
880 Douglas Lane, 5-B
Prescott, AZ 86301-5303
Telephone 778-0238
Feb 9, 1992

Michael Finley, Superintendent
Yosemite National Park
P.O. Box 577
Yosemite CA 95389

Dear Mr. Finley:

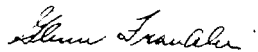
I urge you to restore the major elements of the general management plan to your draft concession proposal and put them into effect before the year 2000.

As you know, a general management plan in 1980 called for the removal of offices, maintenance buildings, and employee housing from the park and a reduction in the amount of overnight lodging in the Yosemite Valley. It also reduced clothing, sporting, and souvenir sales; further, it called for construction of a transportation system to replace cars on the valley floor.

Unfortunately, only a few of the changes have been made. And only a few of the changes are included in the draft plan for concessions in the Yosemite National Park.

As I understand it, the draft proposal for concessions could form the basis for the next 15-year contract. In my judgment the draft is deficient because it abandons the major elements of the 1980 general management plan. Please restore those elements to the draft plan.

Sincerely,


Glenn Franklin
Chairman
Conservation Committee
Prescott Audubon Society

Letter 21

21a See response 3c.

21a

COMMENTS

RESPONSES



California Parks and Conservation Association
P.O. Box 188679, Sacramento, CA 95818-8679

February 24, 1992

Mr. Michael Finley
Superintendent
Yosemite National Park
Yosemite Park, California

Dear Superintendent Finley:

California Parks and Conservation Association (CalParks) is a non-profit organization dedicated to the preservation of the parklands of California for this and future generations. We are an active organization with membership throughout the state that are concerned with park issues at all levels of government.

We appreciate the National Park Service opening the Yosemite Concession Service Plan to public comment. We recognize that opening the process to the public has its detractors. However, since the parks are owned by the public, it is in the final analysis, the public that will ultimately determine whether or not they will survive.

We believe the National Park Service in adopting the 1980 GMP took to heart the value of the public's involvement in charting the future of Yosemite. Understandably, some conditions have changed since 1980, but the changes have been ones that recognize more and more the park's values beyond fulfilling relaxation and recreation for visitors. These changes serve to fortify the vision of the 1980 GMP for Yosemite - the need to reduce impacts by vehicles as well as the crowding brought on by non-park related activities.

Unfortunately, we find the Concession Services Plan breaks faith with that vision of the 1980 GMP and falls short of reducing commercialization in the Valley. We believe the NPS misses the point when it says the greying of America and the public's love affair with their automobiles cause you to jeopardize the serenity and natural beauty in favor of creature comforts.

Letter 22

22a See response 1a.

22a

COMMENTS

RESPONSES



California Parks and Conservation Association

P.O. Box 188679, Sacramento, CA 95818-8679

Overall, we find an inconsistent application of the principles of park protection applied in the development of this Concession Services Plan. An example: Curry Village should remain. Reduce its numbers - as well as the levels of accommodation at Yosemite Lodge and the Ahwahnee. But, reducing the number of modest accommodations for more expensive units paints an unmistakable picture of commercial orientation. We believe removing certain housing and administrative functions of the concessioner and the government from the Valley would have the most far reaching benefits to the Valley. Unfortunately, after all these years you still don't have a housing plan ready - and reject a location identified nearly 50 years ago in favor of a location the public found unacceptable in the 1960's! These are only some of the elements of the plan that we see exacerbating instead of solving Yosemite's problems.

CalParks goes on record that this Concession Services Plan should be rejected and in its place one drafted that undeniably carries out the vision projected by the 1980 GMP.

Sincerely,

Bernard Shanks
President

COMMENTS

RESPONSES

LOS ANGELES UNIFIED SCHOOL DISTRICT
GARFIELD HIGH SCHOOL

February 14, 1991

California Scholarship Federation

5101 E. SIXTH STREET, LOS ANGELES, CALIFORNIA 90022
TELEPHONE: (213) 499-1100
Superintendent,
Yosemite National Park
P.O. Box 577, Yosemite N.P.
California, 95389

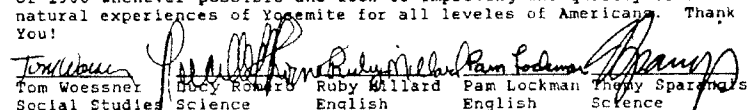
Dear Superintendent,

We five teachers from Garfield High School wish to make a statement concerning the Concession Service Plan for Yosemite National Park. We teach at an inner city school that is part of the Los Angeles Unified School District. Our students seldom if ever get the opportunity to experience and/or enjoy the great natural riches of this country. Therefore, we take a bus load of students each spring to Yosemite Valley. The entire cost of the trip is funded through the efforts of the students, teachers and the community. We make this annual effort because as teachers we recognize the value of Yosemite as a teaching tool and we are painfully aware of what our students are missing, never having the opportunity to visit any of our National Parks, much less Yosemite.

I am certain that you will agree with our personal educational objectives. To that end, we wish to make two points. First, an upgrading of accommodations both for sleeping and food services will not benefit our students or the vast majority of minority youths who, as it is, can ill afford the cost of transportation, food and housing.

Has it ever been noted that the majority of visitors to Yosemite or to most National Parks for that matter, are white, middle and upper class? Increasing the comfort and the cost will not broaden the opportunity to visit and enjoy Yosemite. The second point is that the increased urbanization of Yosemite by adding more motel rooms, fast food outlets, and the like is NOT COMPATIBLE with either the experiences that Yosemite has to offer or the role of the National Park Service in protecting the natural and esthetic values of this world class treasure of nature.

We urge you to follow the spirit of the General Management Plan of 1980 whenever possible and look to improving the quality of the natural experiences of Yosemite for all leveles of Americans. Thank You!


Tom Woessner Lucy Roberts Ruby Willard Pam Lockman Thomy Spardans
Social Studies Science English English Science

Y-L2

Letter 23

23a See response 9b regarding the availability of economy units. The GMP used the term "fast food" to describe food service facilities that quickly provide inexpensive meals either for consumption on site or as a takeout. Also see response 3d.

COMMENTS

RESPONSES



Rex Maughan, Chairman
P.O. Box 29047, Phoenix, AZ 85038

Telephone (602) 967-6006
FAX (602) 968-6883

Conference of National Park Concessioners

January 29, 1992

Officers

Rex G. Maughan
Chairman
Garner B. Hanson
Vice Chairman
Phyllis O'Connell
Secretary-Treasurer

Superintendent Mike Finley
Yosemite National Park
Yosemite, California

Washington Representative

Allen T. Howe

Dear Superintendent Finley:

Board of Directors

Richard O. "Dick" Buck
Guest Services, Inc.
George Campen, Jr.
Fort Senter Tours, Inc.
Garner B. Hanson
National Park
Concessions, Inc.
Edward C. Hardy
Yosemite Park &
Curry Company
Tom Mack
Landmark Services
Tourmobile, Inc.
Rex G. Maughan
Forever Resorts
Phyllis O'Connell
Parkway Inn, Inc.
Bob Palumbo
ARA Leisure Services, Inc.
Terry Povah
Hawthorne Stoves, Inc.
Kay Steuerwald
Mount Rushmore
Mountain Company, Inc.
Stephen W. Tedder
TW Recreational
Services, Inc.

Our organization is studying and evaluating the Draft Concessions Service Plan for Yosemite National Park. We intend to make a full and comprehensive response to you by the deadline date of February 28, 1992.

However, because we believe the changes would have substantial impact on the concession operations with attendant effects upon park visitors, surrounding communities, and in many other ways, we strongly urge the National Park Service to authorize now a full economic assessment as required under NEPA. Our reasoning follows:

Public Law 89-249 requires that a concessioner be given a reasonable opportunity to make a profit commensurate with the capital invested. Economic impacts must be fully analyzed. Congress made this part of the law because it realized that it is in the best interest of national parks and their visitors to have an economically strong and viable contractor so that park facilities do not become dilapidated and guest services do not become unsatisfactory.

In December 1977, the NPS released a financial study by Harris, Kerr, Forster & Co., which concluded that financial feasibility did not exist for a Yosemite concessioner under any of the GMP alternatives. The environmental impact statement to the GMP stated "the concession operation will be operating at a net loss once the proposal is fully implemented."

Letter 24

COMMENTS

RESPONSES

24a

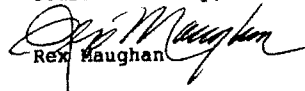
In addition, the Harris, Kerr, Forster study was prepared under the assumption that the concessioner owned the visitor facilities and was debt free. However, with the recent transaction involving the National Park Foundation, the successor concessioner will be required to pay off a note over 15 years. Servicing this debt will consume most of the profit generated by concession operations at current levels not to mention the impact of reduced operations. Any significant change in concession services would jeopardize the ability to repay the loan. Money which would have been available to implement the goals of the GMP is being instead used to purchase the concession facilities with no equity accruing to the purchasing company.

Funds which would have been available to implement GMP goals, pay franchise fees, or perform other projects to the benefit of the Park are instead being taken by the government in the form of possessory interest.

Since the original Harris, Kerr, Forster study, no complete economic assessment has been undertaken of the GMP or the revised Concessions Services Plan. An economic assessment is required under NEPA. We believe that a full study is appropriate and necessary to understand the financial impact not only on the new concessioner but also on the surrounding area, including Mariposa County. Page 59 of the draft Concessions Services Plan notes that the activities contemplated under the Services Plan would "generate demand for housing, health care facilities, and social services" in the five counties outside the Yosemite region. Where is the economic evaluation of the impact on these counties? Additionally, it would seem that an economic evaluation cannot be completed until the results of the housing study are made public and the responsibilities identified between concession and government.

We believe that only with such vital economic information in hand could the National Park Service and potential concessioners make informed decisions regarding future visitor services at Yosemite National Park.

Yours sincerely,


Rex Maughan

RM/ma

24a

Financial analyses for specific development actions are conducted as necessary under NPS concession guidelines and procedures. Also see response 11a.

COMMENTS

RESPONSES

Rex Maughan, Chairman
P.O. Box 19041, Phoenix, AZ 85038



Telephone (602) 967-6006
FAX (602) 968-6883

Conference of National Park Concessioners

February 25, 1992

Officers

Rex G. Maughan
Chairman
Garner B. Hanson
Vice Chairman
Phyllis O'Connell
Secretary-Treasurer

Washington
Representative
Allan T. Howe

Board of Directors

Richard O. "Dick" Buck
Glen Services, Inc.
George Campen, Jr.
Port Service Tours, Inc.
Garner B. Hanson
National Park
Concessions, Inc.
Edward C. Hardy
Yosemite Park &
Carr Company
Tom Mack
Landmark Services
Tourmobile, Inc.
Rex G. Maughan
Forever Resorts
Phyllis O'Connell
Parkway Inn, Inc.
Bob Palumbo
ARA Leisure Services, Inc.
Terry Povah
Hamilton Stores, Inc.
Kay Stuerwald
Mount Roadmore
Mountain Company, Inc.
Stephen W. Tedder
TW Recreational
Services, Inc.

Superintendent Mike Finley
Yosemite National Park
Yosemite, California 95389

Dear Superintendent Finley:

Our organization is pleased to take this opportunity to provide detailed input to the draft Concession Services Plan (CSP) released by the National Park Service. This response supplements our earlier letter of January 29, 1992, a copy of which is attached. Our earlier letter described in detail why we believe an economic evaluation of the CSP is necessary. Since our position on that subject has not changed, we are hopeful that you are giving the CSP economics appropriate consideration.

This response is divided into general comments, which are incorporated in this letter, and specific comments detailed on the schedule attached. We hope this input will be valuable to you.

1. **The CSP is not complete.** The CSP refers to ten documents that are to be read in conjunction with the CSP. Only five of the ten documents mentioned, however, have been completed. How can one fully assess the CSP without referencing these other important documents, particularly the Resource Management Plan? We believe that a housing study, a transportation study, and an economic assessment all must be prepared and released so that the CSP can be reviewed, interpreted and understood by both the general public and businesses that may have an interest in becoming concessioners in Yosemite.

2. **The Plan is misleading.** The CSP neglects to state that the goal for overnight use in Yosemite Valley identified in the 1980 General Management Plan (GMP) was 7,711 people and that "access will be restricted when these capacities are reached." Overnight use in Yosemite Valley is already below the GMP capacity! On the busiest day of the summer in 1991, fewer than 7,000 people stayed in Yosemite Valley campgrounds and overnight accommodations combined.

24b The documents are listed for reference and to show the context in which this planning effort has been conducted.

24c Applicants for concession contracts will be provided with available plans for concession services and housing, as well as other relevant documents for use in preparing applications. Also see responses 2b, 18a, and 24a.

24d The 7,711 figure is the visitor use limit established in the 1980 GMP to describe the "maximum overnight use levels for each developed area". It is not a goal of the 1980 GMP to ensure that visitor use is at the established visitor use limit. Also see responses 1a. and 3c.

24b

24c

24d

COMMENTS

RESPONSES

Superintendent Mike Finley
February 25, 1992
Page Two

This obvious contradiction to the GMP -- the GMP calls for a 12% reduction in campgrounds, a 17% reduction in overnight accommodations in Yosemite Valley and an overnight use level of 7,711 -- must be resolved, not ignored.

Clearly, National Park Service (NPS) studies have shown that day users have a bigger impact on Yosemite than overnight users. All NPS surveys of Park visitors have consistently shown that visitors prefer an overnight experience in the Park and do not want a reduction in accommodations and that overnight users are more likely to ride the shuttle buses and attend NPS interpretive programs.

The NPS prescription to reduce overnight accommodations inside the Park has stimulated hotel development surrounding the Park, with a corresponding increase in the number of day users. These surrounding operators are not regulated like those inside the Park. They do not contribute to the Park by helping to pay for shuttle buses, by paying franchise fees or contributing to Park improvements. These operators encourage additional summer visitation to the Park through advertising and billboards. By encouraging a shift of accommodations from the regulated environment inside the Park to outside, the NPS will lose control of how Yosemite is promoted and used, as well as losing valuable funding for the Park's operation, protection and preservation.

The congestion issue in Yosemite Valley must be addressed, but the NPS is attacking the wrong cause. The GMP did not anticipate the increasing impact upon the Park by the day visitor. In fact, the Environmental Impact Statement to the GMP states that the day use level was determined "based upon the maximum number of cars and buses that will be able to park there in one day and multiplying the numbers by 3 people per car and 50 people per bus." In other words, GMP day use limits were not based upon any carrying capacity analysis. It appears that at the time the GMP was written, overnight visitation was seen as a greater concern. It is not too late to take advantage of what has been learned since 1980 and to maintain the sense of enjoyment, relaxation and family an overnight visit to Yosemite Valley brings.

It has been noted that existing Yosemite Valley restaurant facilities are overtaxed because of day user impacts. Day users tend to eat only one meal (lunch) in the Park. Further impacting the environment by building enough facilities for this peak use period appears inconsistent with other GMP goals. Why not restrict day use and cut back on the level of necessary eating facilities, parking, etc.?

Areas impacted by existing overnight guest accommodations should be reduced by exchanging some tents and cabins for two-story, clustered units. Such accommodations are less expensive to build and operate and accordingly, could be rented to the visiting public at lower rates than cabins. Clustered units free-up land by reducing required footprint and eliminating multiple entryways.

COMMENTS

RESPONSES

Superintendent Mike Finley
February 25, 1992
Page Three

What about restricting traffic more stringently on busy summer days by merely stationing rangers at appropriate locations along the road to divert cars from the Valley? This is already now done on busy summer days and is not costly to implement. Additionally, since reservation systems are now in place for overnight users in the campgrounds, at hotel facilities and for the backcountry, how about an additional reservation system for day users?

Improvements can and should be made in Yosemite Valley, but the problems to be solved need to be those real issues affecting the quality of the environment and the quality of visitor experience, not the perceived or imagined issues that have been politicized in the press. Parks are for people too. Capriciously depriving people of the chance to see Yosemite without any environmental benefit would be a disservice to the American public.

24e

3. The CSP includes more detail than is necessary and appropriate, particularly in describing retail services. In the "Statement of Requirements" for Yellowstone concession operations released by the NPS in 1991, concessioner merchandising operations are authorized as follows: "A gift shop operation will include those services and items customarily offered and sold within hotel/lodging accommodations familiar to national parks." Why is Yosemite so much different than Yellowstone?

24f

NPS-48 states: "It must not be the intent of the National Park Service to dictate tastes and specific gifts and souvenirs to the concessioner or the public or to develop specific merchandise products that concessioners can sell." It continues, "Dictating public tastes is a hazardous business: at best, it imposes a dull uniformity on our outlets; at worst, it keeps from the shelves items the public wants or needs but which do not happen to match the tastes of management." It appears the CSP has violated these guidelines. Further, the NPS already has the authority to require the removal of any item it considers inappropriate. What further jurisdiction or control is necessary?

If the CSP merchandising themes or shop selections don't work, will a new environmental impact statement be necessary? Will Congress need to approve a contract change? What is wrong with "appropriate and necessary" or the wording in the Yellowstone prospectus? The CSP should be flexible to allow for better ideas as they arise. According to many within the NPS, one of the primary problems with the GMP is its extensive use of exact numbers, rather than conceptual guidance. It is our opinion that the CSP makes that same mistake.

The CSP should identify the retail locations and leave it to the operator to select merchandise appropriate for each location. Obviously, an experienced operator ought to provide merchandise appropriate for each location, but if not, the NPS already has the authority to eliminate products that are not appropriate or necessary.

24e

The level of detail in the *Concession Services Plan* is appropriate to inform decision makers of issues, alternatives, and potential impacts.

24f

The quotation from NPS-48 is incorrect. NPS-48 lists United States handcrafts, authentic United States Indian/Eskimo handcrafts, and park-related items as preferred merchandise. The intent of the concession services plan is to provide a process for carrying out that direction. The plan does not violate NPS guidelines as suggested in the comment.

COMMENTS

RESPONSES

Superintendent Mike Finley
February 25, 1992
Page Four

The CSP requirement that handicrafts other than those from local and regional Indian artists be excluded is inconsistent with national policy, which calls for incentives to sell Native American handicrafts.

Additional examples where the CSP includes too much detail include: the relocation of the Concierge Desk at The Ahwahnee; exact counts of restaurant seats by location; specifying types of food service by location; and, requiring the Loft restaurant to be open year-round. The attached list indicates additional areas of concern.

24g

4. The CSP moves many functions without perceptible benefit. The CSP describes moving operations and functions from place to place, often over a very short distance, without describing the environmental benefits or the improved visitor experience. Examples include: moving the automatic teller machine to the Village Grocery Store; moving Degnan's Deli to the Village Grocery Store; eliminating the Village Grill and expanding fast food service at Degnan's and moving the Mountain Shop to the Village Sport Shop. These relocations would require significant building modifications, possibly create infrastructure imbalances, overtax existing back dock and service areas, result in inefficient use of space and add to congestion. Additionally, these moves would be very expensive and would reduce funding available for higher priority projects.

24h

5. The CSP is silent on certain existing concession operations. For example: (a) Interpretive programs are currently provided every night of the year by the concessioner -- 22 times per week during the summer; (b) Daily camera walks are provided by the concessioner year-round; (c) One third of the funding for the Yosemite Guide comes from the concessioner; (d) The concessioner operates at significant cost an extensive recycling program that is far broader than required; (e) The concessioner is a supporter of numerous community and social service agencies such as local schools, the Yosemite and El Portal day care centers and the Yosemite Renaissance and, (g) The concessioner publishes interpretive materials used in its facilities such as soft drink cups, placemats, etc.

What is the NPS's expectation concerning a new concessioner's responsibility for these continuing programs?

Summary

Yosemite decisions should not be driven by arbitrary calendar dates (such as the expiration of a contract) at the expense of the national park. Rushing pell-mell into a new concession contract without a comprehensive plan for concession services, as well as future housing and transportation development, is foolhardy. The public deserves a chance to evaluate clearly defined environmental impacts and information detailing how all future plans can be implemented. All of the data, input, surveys, studies, common sense and clear desires of

24g

These moves are more fully explained in the final proposed action. The moving of services is prompted by the desire to provide the services deemed necessary in the park, improve service to visitors, and meet GMP goals. The overall moving of services and support functions would result in a more efficient use of space and additional back dock, storage, and service space. It would not add to congestion, as suggested. The cost of these modifications are believed to be reasonable expenses to meet park objectives.

24h

The plan indicates that the concessioner would be encouraged to continue and expand interpretive services. The park will review existing concessioner interpretive and community activities, such as support for day care centers, which will be reflected in operation plans.

COMMENTS

RESPONSES

Superintendent Mike Finley
February 25, 1992
Page Five

the majority of Americans should not be ignored in trying to force the completion of the CSP.

In the recent Park visitor survey commissioned by the NPS and prepared by James A. Graham, a sociologist with Texas A&M University, it was reported that 99% of auto passengers to Yosemite classified their experience as good, very good, excellent or perfect, while only 1% classified their experience as fair or poor. 95% of bus passengers cited in the same study were happy with their Yosemite experience. Further, individuals thoroughly familiar with Yosemite Valley, such as David Brower and Ansel Adams (according to his 1985 autobiography), believe Yosemite Valley is in better condition now than in the past. What Yosemite needs is fine tuning, not a bulldozer and misconceived nostalgia.

We appreciate the opportunity to provide input regarding the Yosemite draft Concession Services Plan and hope that comments included in this letter, as well as the attachments to it, are helpful.

Yours sincerely,


Rex Maughan

COMMENTS

RESPONSES

Specific Comments on Draft Concession Services Plan

By Conference of National Park Concessioners

The comments below are intended to assist the National Park Service in establishing a concession plan for Yosemite National Park. These comments should be read in conjunction with our formal response.

24i

1. The draft Concession Services Plan (CSP) is too detailed. Examples are the relocation of the Concierge Desk at The Ahwahnee hotel, detailed descriptions of acceptable retail merchandise by store location, exact counts of restaurant seats, specifications of types of food service by location and requiring the Loft restaurant to be open year-round. What happens if a decision is in error and needs to be changed? Is a new supplement to the 1980 General Management Plan necessary? Is an addendum or a revision to the concession contract necessary? Will it require Congressional action? One of the primary faults with the 1980 General Management Plan is the inclusion of specific numbers in a conceptual document. It appears this draft CSP takes the GMP to new extremes. Conceptual plans should be developed and supported by specific reference to what is to be accomplished within a specific footprint. For instance, identifying a location as retail or food service should be adequate. Specifying the exact merchandise or food type is overkill.

24j

2. The decision to maintain single, duplex, and quad units at Curry Village is questionable due to the acreage required. High-density motel units provide an opportunity to reduce land use in Yosemite Valley, lower energy use, lower construction costs, reduce the number of employees necessary to provide maid service and provide low-cost accommodations to visitors. The "cabin in the woods" recommended by the CSP for Curry Village has nostalgic appeal, but cabins are more expensive to build, operate and maintain than higher-density units. Accordingly, stand-alone facilities will cost more to rent and impact more land, not only from sheer footprint but also from the need for multiple entries.

24k

3. The Alternative B discussion of lodging on Page 9 notes "design elements such as privacy and landscaping, together with resources and safety restrictions such as floodplains and rockfall zones at Curry Village and Yosemite Lodge, indicate a further reduction of lodging units in Yosemite Valley is necessary." It goes on to state "these numbers are subject to minor design-related adjustments." On Page 63, in a discussion of impacts on the natural environment, the document states "without a preliminary design, accurate quantification of the effects on vegetation from these actions is not possible, but some qualitative impacts can be anticipated." How can one know buildings won't fit (Page 9 statement) without a preliminary design (Page 63 statement)? Conversely, if one knows the buildings won't fit, why can't the environmental impacts be quantified?

24i

See response 24e.

24j

High density development, as suggested by the comment, would not be appropriate because of the historic character of Curry Village. The approach detailed in the final proposal would result in a smaller number of lodging units at Curry Village; this is believed to be an acceptable tradeoff to offering higher density motel units.

24k

The planning and environmental analysis contained in the final supplemental EIS is adequate for the decisions required. An initial examination of the land area available at Curry Village has provided an estimate of how many lodging facilities could be proposed in the plan. In the introduction to the "Environmental Consequences" chapter and the description of the consequences of alternative B, impacts that are known from current information are described, and information that will be required in subsequent planning is defined. Also see response 24e.

COMMENTS

241

4. The draft CSP calls for a reduction of retail space beyond that provided for in the GMP. Further, it calls for merchandise restrictions and other limitations that cannot be quantified by a concessioner desiring to bid on the Yosemite contract.

- a. The Merchandise Services Section of Alternative B requires, in essence, theme shops in different parts of the Park. This will force a "Carmel"-type shopping experience. Visitors will have to go from store to store to view a full range of merchandise, returning to the store where they found the quality, style and type of merchandise suited to their particular interest. This will increase visitor time in shops and add to congestion.
- b. The CSP calls for a 25% reduction in retail space in Yosemite Valley – yet retail space has a very minimal environmental impact. In the 1980 "Final Environmental Impact Statement," the NPS noted: "For example, since gift shops produce substantial amounts of operating profit compared with the amount of space and capital they require, it may be desirable to retain the present number of gift shops and to reduce the amount of less profitable facilities requiring substantial amounts of space." Apparently this option was never analyzed or considered and the reasons for its dismissal are not clear.
- c. It appears that the CSP retail requirements for themed merchandise with labels detailing the cultural or resource theme, and the requirement for only Yosemite identified apparel would significantly increase the general price range of gifts and souvenirs available in Yosemite. Further, limiting gifts and souvenirs to only those that relate to the Park's resources and educational messages means missing products that may have a broader environmental message.
- d. It appears the Plan is unduly restrictive. Page 12 notes "merchandise outlets will be located at enough sites in the Park to minimize the need to use personal or other transportation systems to purchase needed merchandise." However, many actions identified in the Plan will increase travel, not reduce it. For instance, removing all non-souvenir clothing from the Yosemite Lodge gift shop ignores the fact that many guests need a simple coverup or socks, etc. Under this plan, all visitors must travel to the Village or purchase something that is Yosemite identified. Most products stocked today are functional, utilitarian products appropriate for use in Yosemite's seasonal climate, such as swimming suits, socks, raingear, hiking shoes and other outdoor gear and apparel. Requiring that only Yosemite-identified apparel be available in selected shops, means either reducing the quality of the apparel (for instance the "Columbia" company would probably not allow Yosemite identification on its clothing), or increasing the cost of the clothing if extra machining is necessary in order to apply Yosemite identifiers. Another example is the inexpensive rain ponchos that are commonly sold during inclement weather. Must these all be stenciled "Yosemite?" Do we really want everybody in a rain poncho with Half Dome on the back?
- e. In developing a final concession services plan, will the NPS provide exact specifications or a list of appropriate products for a new concessioner? How will a concessioner determine what products now being sold will not be appropriate under a new concession operation?

2

RESPONSES

241

The detailed operational issues mentioned with this general comment have been noted. It should be explained that concession contracts reserve to the National Park Service the right to determine the nature and type of services to be provided by the concessioner. This right is in effect recognized in the *Concession Services Plan*, which provides specifics in some cases. It is the responsibility of the National Park Service to determine which services are necessary and appropriate for a park. This responsibility is being exercised in the plan and will be further exercised in the concession contract. We do not believe this action will have a material effect on any concession contract applicant's ability to bid on the Yosemite concession contract. Also see response 3c.

COMMENTS

RESPONSES

- f. How will new products be selected? Will NPS representatives attend gift shows with concession buyers to specifically approve those products acceptable in national parks? Will there be a selection board? Will it be a vote?
- g. The draft CSP includes the statement "Gifts and souvenir items that are commonly found in gift shops outside the Park and that do not relate to any of the identified themes would not be allowed." Exactly what is meant by this statement? If the concessioner developed a product line that was subsequently duplicated outside the Park, would that mean that the NPS would require that the concessioner remove this product line? If a visitor wanted a birthday greeting card would he be required to leave the Park to purchase it?
- h. The addition of a grocery store at Curry Village in the existing Mountain Shop appears to be a decision made to justify removal of the ice rink. Adding a grocery store in the middle of overnight guest accommodations at a location where cooking is not allowed (safety concerns) and where direct shuttle bus access or enough parking for the overnight accommodations is not available will cause additional problems at Curry Village and will not reduce congestion or enhance the visitor's experience. Further, this location is not significantly closer to the campgrounds than the existing Village Store and has poorer shuttle bus access, inefficient delivery set-up, lack of adequate storage space and no back-up refrigeration, all of which are necessary for a successful grocery store operation.
- i. Consolidating Degnan's Deli and the Village Grocery under one roof is inefficient. Preparation of deli sandwiches requires walk-in boxes, sanitation standards and prep facilities and equipment not normally located in a grocery store. These facilities are now available in the central kitchen of the Degnan's building and it would be costly to reconfigure the grocery store. Further, this action will increase congestion. Why not leave the deli operation where it is rather than converting Degnan's to a different type of food service?
- j. Combining the Village Sport Shop and the Curry Mountain Shop will create more congestion. The proposed location does not provide enough space for technical equipment, camping gear and a mix of apparel. This action ignores the interpretive and educational services now provided in the Mountain Shop and ignores use of the Village Sport Shop as a community recreation center during the winter. This action, which is again apparently driven by the decision to remove the ice rink, exacerbates parking problems and congestion rather than solving them.
- k. The requirement that handicrafts other than those from local and regional Indian artists be excluded is inconsistent with national policy, which calls for incentives to sell Native American handicrafts. Further, the selection for local and regional products is limited. Can the NPS provide a list of native handicrafts that are available, in what quantities and at what price to help a potential concessioner bid?
- l. The draft CSP notes that "Sporting goods and apparel..would be limited to one outlet each in Yosemite Village..Wawona..and Tuolumne Meadows." What about Badger Pass?

COMMENTS

RESPONSES

24m

5. In considering food and beverage service, one must consider the need to feed employees. If employees are to be relocated out of the Valley, additional eating facilities are probably necessary inside Yosemite Valley. Employees now have kitchens available to them at their residences. If these kitchen facilities are no longer available, either employee facilities must be expanded or space identified within the public facilities for employee meal service.

24n

6. In assessing the CSP for Yosemite Village, the following observations should be noted:
- With the proposed reduction in retail space, fewer people will be in this area and an expanded food service is probably not necessary. This action would require visitors going to a central location for food service over a very short time (lunch) and would increase congestion.
 - Requiring that the Loft restaurant be open year-round is inconsistent with other actions to reduce the level of activity in the Village area, such as removing NPS and concession headquarters and reducing the amount of retail space. Additionally, this facility is not winterized and significant changes would be necessary to make its use acceptable year-round. Why not call for appropriate levels of year-round food service rather than identifying the exact restaurants to be open?
 - Elimination of one food service location (Village Grill) and expanding another (Degnan's) only increases Village congestion. Further, this action increases concessioner costs and ignores the fact that the Village Grill serves as a community feeding and recreation facility in winter.
 - With fewer overnight users and more day users envisioned in the CSP, fewer people will be in the Village during the day because day users do not use the shuttle and are directed to park at Curry Village, where relatively more parking will be available when some overnight accommodations are removed. With day users currently directed to the Curry Village apple orchard, how will they get to the Village to eat? More food service is necessary at Curry Village.
 - The Village Sport Shop is used as an employee/community recreation center in winter. Will this service be eliminated or continued at an undetermined facility?

24o

7. The food services plan provides for a reduction in seats by the conversion of the Curry Village cafeteria to a family dining restaurant. Curry Village is probably the most crowded food service location in the Valley because of its proximity to the campgrounds and Housekeeping Camp, where no eating facilities for the 4,000 visitors spending the night in these units are available and who, due to sociological trends, now eat a greater proportion of their meals at concession facilities than in the past. Curry Village is also identified as the day use parking area. How will all these visitors be served? The conversion of a cafeteria to a sit-down restaurant means a more labor-intensive operation and fewer turns of existing tablespace. This increases the need for more employees and support facilities and reduces the speed of food service. What about an additional sit-down restaurant?

24m

Employee dining facilities are considered in the draft *Yosemite Valley Housing Plan/Supplemental EIS*. Also see response 18a.

24n

The final proposal was revised to continue the Village Grill operation. Unlike the draft proposal, it does not indicate that the Loft Restaurant would be required to operate year round. The changes in merchandise activities would not affect current food service activity. The comments on food service have been considered in revising the plan, and the food service study indicated in the plan will involve consideration of the other comments raised. Employee/community recreation facilities will be considered in future planning efforts.

24o

In response to public comments, further study of the use of the Curry Village food pavilion will be done with a food service consultant before a decision is made about which type(s) of dining services to provide. Also see response 3d.

COMMENTS

RESPONSES

24p

8. The draft CPS consistently refers to "fast food." A more appropriate term would be "convenience food." This would allow for more flexibility in implementing the Plan and could incorporate a self-service concept.

24q

9. In discussing Yosemite Lodge the CSP notes that the Mountain Room Broiler seating area would be enclosed to provide increased inside restaurant seating to reduce the current waiting period year-round for evening meals. This may not be necessary. During the summer, the patio is available for seating and during the winter the space is, by and large, not necessary. Further, it is now common for Curry Village guests to travel to the Lodge for dinner. As year-round units are added to Curry Village and food service is changed at that location, increased capacity may not be necessary at Yosemite Lodge.

10. On Page 11 the plan notes "a renovation of the Yosemite Lodge cafeteria also would improve service efficiency." On a typical summer day, we have been told the Lodge cafeteria serves almost 2,000 meals per day (about 650 breakfasts, lunches and dinners) in a 270 seat facility. It is doubtful that the through-put of this facility can be significantly improved. What is needed is an employee sidehall so that employees can relax in a non-guest environment and visitor service can be improved.

24r

11. The plan to add a coffee shop at the Wawona Hotel is inconsistent with sound judgment. A 145-room hotel cannot support two restaurants. Perhaps a convenience food location or deli operation near the existing grocery store should be considered.

12. Regarding packaged alcoholic beverages on Page 14, it is a mistake not to have packaged alcoholic beverages (bottled wine) available at The Ahwahnee hotel gift shop. The purchase of bottled wine at an establishment known for its fine dining is an appropriate memento of a Yosemite stay, and it is not uncommon for hotel guests to purchase wine as gifts.

24s

13. Page 13 calls for the relocation of the Ahwahnee Concierge desk and notes that the Sweet Shop "would be converted to a hotel information/tour reservation center and also would sell limited sundries." It appears that this action is nothing more than an excuse to justify reducing retail space as certainly nothing positive is accomplished by hiding the Concierge and transportation functions at The Ahwahnee hotel. Further, the Hotel front desk, the Concierge desk and the Sweet Shop have all been changed and adapted to their current uses since the 1980 GMP was published. Each of these projects was done with the advance approval of the NPS. What has happened to cause the NPS to reverse its position on these issues? If the next administration changes its mind once again, will a concessioner be required to invest its capital moving things back to where they are now?

24t

14. Page 14 states "Bus and tram tours also would be reviewed to determine how routes might be changed to enhance interpretive experiences." The concessioner now works diligently with the NPS to establish interpretive tours that are appropriate, safe, informative and fun. If the NPS has ideas as to how these routes might be changed, why wait for a new concession contract?

24p

See response 23a.

24q

We believe that the efficiency and level of service would be improved through the redesign of the cafeteria. This option would allow use of this area during inclement weather or when bees are a problem. The final decision on how this might be done will follow a design study of the food service complex.

24r

The Wawona Hotel dining room currently has insufficient capacity to accommodate hotel guests and other diners. With the proposed expansion of the Wawona campground and other overnight use in the Wawona area, another food service facility would be needed in the near future. The final plan proposes that this facility be constructed in Wawona outside the hotel complex.

24s

See response 24l.

24t

Such a review is an ongoing effort. In the *Concession Services Plan* it is recognized that this will be done with a new concessioner, just as it has been done with the present one.

COMMENTS

RESPONSES

24u

15. To consider a moving the stables without acknowledging that the concessioner and NPS stables would be combined is an oversight. Additionally, experts should be consulted to determine whether the proposed stables location is potentially hazardous to the health of equines, either due to reflection of sunlight from the nearby rock walls or due to the colder seasonal temperatures. Limiting horseback riding opportunities without identifying how stock, rides and locations to be ridden are to be impacted makes it impossible for a concessioner to judge the potential changes in his bid.

24v

16. Page 14 notes that the bank building would be used adaptively for visitor use, with no designated purpose. Page 15 notes that the teller machine would be moved to the Yosemite Village General Store. The teller machine currently built into the bank building requires significant infrastructure. Further consolidating these services in the General Store would not be beneficial to Yosemite visitors and would be very expensive. The teller machine is now heavily subsidized by the concessioner. Moving this service to an alternate location would further add to cost, require significant infrastructure, increase congestion and not change anything.

24w

17. Requiring auto towing at Yosemite Lodge, El Portal, Crane Flat and Wawona is not cost effective. What seasons and hours are these services required? Without support staff available to operate the truck (Crane Flat), towing equipment would be useless much of the time.

24x

18. Removal of the Yosemite Village beauty and barber shop is premature until a housing plan is released. The same goes for video rentals. These are purely employee services. If employees are to continue in Yosemite Valley, these services should be continued. The CSP implies that the video rental is open to the general public. It is not.

24y

19. Page 15 notes that restroom facilities would be expanded into the area currently occupied by the Employee Uniform Center (and the beauty and barber shop?). Without a uniform center or a beauty and barber shop at this location, these restrooms would be less utilized than now, and they currently are not heavily used. This action seems to be an excuse for relocating the Uniform Center and barber shop and does not serve any viable purpose. With expanded food service at Degnan's, it would appear to make more sense to build larger restrooms in the Degnan's area. What is the benefit of relocating services if the area freed up is not used for reasonable purposes?

24z

20. Page 16 notes that the Employee Uniform Center and local employee housing, payroll and personnel offices would be moved to the warehouse. These services are now centralized. Since this move takes these services away from shuttle bus access, it will only worsen traffic and circulation problems in the Village area. By requiring a district operation for administrative functions as called for in the CSP, this will maximize the impact of these administrative functions, require additional employees and adversely impact a concessioner's profitability.

24u

In response to public comment, the concept of relocating the valley stables to the old Curry Dump Site was reevaluated. However, it has been determined that this area would not be too cold for the horses, considering the late date in the spring when they are brought into the park. The size of the area is considered adequate because the number of rides and horses would be reduced. Odor is not expected to be a problem with adequate stable maintenance. No problem from the presence of hazardous materials would be expected. Appropriate authorities would thoroughly evaluate the site before a final decision was made to relocate. Also see response 5a.

The dump site cannot be seen easily from Glacier Point. Relocation would have a beneficial effect because the old stable site could be restored to meadow, and new routes would be limited to the south side and east end of Yosemite Valley.

This document deals with concessioner operations rather than NPS operations. However, combining the two operations has merit, and it will be considered.

24v

In response to public comment, the proposal has been modified. The final proposal includes relocation of the art activity center to the bank building. The location of the automatic teller machine is not specified.

24w

The proposal of offering service from these four locations is based on observed needs and the desire to provide minor auto service from these facilities instead of from one central garage. The hours and types of service would be determined in the concession contract operation plan.

24x

The location of these employee services will be determined in the draft *Yosemite Valley Housing Plan/Supplemental EIS*. Text has been added to the final proposal to indicate that the video rental served employees.

24y

We disagree. Current use patterns indicate a need for expanded restrooms with easier access from the store complex. The space resulting from removal of the beauty shop and relocation of the

COMMENTS

RESPONSES

24aa

21. Page 16 notes that "as an interim measure, bus parking and fueling would continue at the garage site." Why is there reference to an "interim measure"? It is the only hint of any timeline in the CSP. Does this mean the garage building is to be torn down immediately?

24bb

22. Under "Access for Visitors with Disabilities" is the note "new visitor facilities and new work areas and housing for employees would be designed and constructed to be fully accessible and existing facilities would be rehabilitated to make them fully accessible." If this statement is a requirement that all work areas, all facilities and all housing meet these standards it should be reconsidered. The Americans with Disabilities Act, among others, dictates which facilities are required to be accessible or not. Such a sweeping requirement is costly, unnecessary and inconsistent with federal and state laws.

24cc

23. Page 16 of the plan notes "implementation of project priorities..." -- what is this? -- and states "however high priorities already exist for several actions: relocation of the primary concessioner's headquarters and employee housing to a site outside Yosemite Valley, removal of the Yosemite Village garage and repair facility, remodeling of food facilities and replacement of lodging facilities." How would anyone know priorities from reading this document? How are these priorities determined? How are they weighted? Without knowing where these facilities are to be moved how can a concessioner make a reasonable bid? Obviously, building housing outside the Valley is a significant cost which could vary dramatically depending upon the location selected. Will a concessioner be required to provide public transportation for its employees? Additionally, it would be extremely inefficient to relocate concession headquarters outside the Valley. Without knowing where facilities might be or when they might be relocated, it is impossible for a concessioner to evaluate this operation economically.

24dd

24. Page 26 notes the existing use of the guest lounge at Yosemite Lodge is for "meetings and special functions." This facility is also used extensively for interpretation and public relaxation. Alternative B notes that space is to be used for "interpretation and for information purposes." Does this preclude use for meetings and special functions and mean that conferences would not be allowed? This issue is unclear in the CSP. Without being able to use this room for meetings and special functions, the concessioner's ability to book groups in the winter is severely compromised, with corresponding economic ramifications.

24ee

25. Page 27 notes that the service stations become self-service. The service stations are not now configured correctly to be self-service (for instance, the pump islands should have a roof) and this change could significantly impact profits. If changes to self-service are required, capital requirements for these changes should be identified.

24ff

26. The amount of food service proposed for Curry Village on Page 27 is entirely wrong. With the campgrounds and Housekeeping Camp nearby and the use of Curry for day visitor parking means that more food service is necessary, not less. Day visitors have

uniform center would be available to the concessioner for support purposes.

24z

We disagree. The proposed location of payroll and personnel is a few minutes' walk from the existing location; this would not worsen traffic or circulation problems.

24aa

The final proposal has been modified to indicate that bus parking and fueling would eventually be relocated to a transportation staging area. The removal of the auto garage is a top priority.

24bb

The accessibility requirements included in the final document meet all federal standards.

24cc

See response 1b.

24dd

The final proposal includes a guest lounge for Yosemite Lodge in the area now occupied by the Mountain Room Bar. The area occupied by the Mountain Room Bar and Cliff House would be redesigned. Among other issues, winter use of the Cliff Room by groups would be considered during redesign.

24ee

It is the intention of the National Park Service to provide self-service at all service stations in order to make gasoline available to park visitors at a reduced cost. The cost of the conversion would be a development cost for the new concessioner. It should be noted that Public Law 89-249 provides a concessioner a reasonable opportunity to "realize a profit on his operation as a whole."

24ff

See responses 3d and 24o.

COMMENTS

RESPONSES

- too little time to utilize a sit-down restaurant facility and either don't have the time or the inclination to figure out how to get to the expanded fast food services proposed at Yosemite Village.
- 24gg 27. Page 28 of the draft CSP calls for the removal of the ice rink, which is inconsistent with the GMP. The GMP called for this activity to continue. It is our understanding that the primary concern about the ice rink when the GMP was under discussion was the impact of the ice rink on the view from Glacier Point. There are many opportunities to reduce the visibility of the ice rink by repositioning it, hardening the surface and using it for other purposes during the summer, such as for bike rentals (as called for in the GMP) and raft rentals, and screening the rink to reduce its visibility. Alternatives can be accomplished to retain the rink, consistent with the GMP. In addition to the negative environmental impacts and obvious safety concerns that may result from individuals using the river to ice skate, the Curry Village ice rink should be retained because it provides a traditional winter activity with significant cultural benefits. The few fanatics who insist on purity in Yosemite Valley and advocate removal of the ice rink because it is not natural, will never be satisfied with any level of human activity and/or structures in the Valley. Yosemite Valley will not be a better place without the Curry Village ice rink.
- 24hh 28. Page 28, Horseback Rides states "move from river bottom." River bottom? Are the campgrounds between the river and the stables also scheduled for removal? A further comment is to "require interpretation." What does this mean? Obviously, a concessioner would be more than happy to provide whatever level of interpretation is appropriate and safe. Numerous options are possible. The NPS should provide specific input as to what it believes is appropriate.
- 24ii 29. The document fails to note the addition of cross-country ski facilities at Badger Pass since the 1980 GMP was finalized, that the GMP called for parking lots near Summit Meadow and the Bridalveil trailhead and that the NPS was to plow the road beyond the Bridalveil trailhead. The information in this section of the CSP is incomplete.
- 24jj 30. Page 29 notes that ski rentals and sales have been added since the GMP at Badger Pass. This is not true. Cross-country rentals have been added. Is that what is meant?
31. Page 30, South Entrance, says to add an information/orientation/reservation system. Whose responsibility is this? The concessioner? Where is this spelled out in the CSP? How can a concessioner quantify his financial responsibility?
32. Page 31 under Lodging Information/Reservations for Tuolumne Meadows notes "to be considered." What is to be considered? How about adding a phone line? Financial impact?
- 24kk 33. Page 32 notes that Park-wide lodging and food service numbers are subject to minor design-related adjustments yet the document is unable to quantify the impact of these lodging units in doing the Environmental Assessment. Which is it? Are there

- 24gg The GMP called for ice skating to continue but to be conducted at a portable rink. The existing site would have been used for a grocery store and in summer, for bicycle rentals.

The ice rink does provide an outdoor recreation activity in winter with minimal impact on park resources. It also provides an alternative to those who would otherwise consider ice skating on the Merced River, with potential for both resource damage and personal injury.

In response to public comment, the final proposal has been modified to retain the ice rink at the existing site while providing a more natural setting. The site would be used for bicycle rentals in summer, precluding the need to construct a rental facility. The site's visibility from Glacier Point during summer would be mitigated through realignment, the planting of additional trees, and the use of a camouflage canopy. Parking would be retained at the ice rink site.

- 24hh See response 24u.

- 24ii The draft plan notes the location of nordic trailheads at Badger Pass. The road is plowed as far as Badger Pass ski area. Because of potential adverse environmental impacts, the final supplemental EIS indicates that a trailhead would not be built at Peregoy Meadows as called for in the GMP, nor would the existing Summit Meadow parking area be expanded.

- 24jj Responsibility for operation of these systems would be determined following consultation with the concessioner.

- 24kk See response 24k.

COMMENTS

RESPONSES

	plans or not? If there are plans, where is cost and room rate information? Financial impact?
24ll	34. Page 32, Convention/Group Meetings notes "support functions and services for other special events are eliminated or reduced." What does this mean? For instance, is Bracebridge eliminated? Yosemite Association and Yosemite Institute meetings? All conferences? All weddings? Winter conferences and special events provide year-round continuity of staff and services. Without these year-round services, particularly in light of increased numbers of accommodations with bath, the concession operation will be less economically viable.
24mm	35. On Page 37, Yosemite Village is described as "the core area for most development and day use in Yosemite Valley." The current infrastructure does not support that. All day users are directed to Curry Village and forced to find their way from there. Relatively few ride the shuttle bus. If Yosemite Village is to be the day use option, appropriate parking should be identified in the Village.
24nn	36. Page 46 notes that the National Park Service "will adhere to the management policy of non-degradation and enhancement, regardless of the wild, scenic or recreational classification of the particular segment affected." When was this management policy adopted? Is this set at the park level or is this national policy? Isn't this policy inconsistent with the requirements of the Wild and Scenic Rivers Act? The next paragraph notes that the Wild and Scenic Rivers Act requires that "the outstanding values be protected and enhanced within the corridor." Doesn't this mean that as changes occur river values need to be considered so existing values are not degraded, not that actions such as moving the Tuolumne Meadows dining tent should be initiated to force a river section into a higher classification?
24oo	37. On Page 46 the document notes "the outstanding river values have not been defined." Page 67 notes that removal of the Tuolumne Meadows dining room and other actions would "enhance river values." How can one know that values will be enhanced if the river values haven't yet been defined?
24pp	38. Page 46 notes that "natural values of the river included removal of large, woody debris such as fallen trees and logs to accommodate river rafting." This is not true. Logs have been removed from Yosemite Valley waterways for years prior to the time commercial river rafting was started in order to protect bridges and, incidentally, to provide for the safety of private rafters. Logs have not been removed solely to benefit commercial river rafting.
24qq	39. Page 62 notes that relocation of auto repair services would "inconvenience visitors and residents who have become accustomed to having this service available in Yosemite Valley." What this would do is dramatically increase the cost of automobile repair. Towing all vehicles to El Portal and then back would be extremely costly for visitors to the Park and towing oversize vehicles (motorhomes) on Highway 140 creates a dangerous situation. Obviously, if visitors elected to travel with their vehicle to El Portal, this would wreck their Yosemite experience. This

24ll	These decisions will be made by the National Park Service as appropriate, and they will be reflected in the concession contract operations plan.
24mm	The meaning intended by the phrase "core area" was that most visitors visit Yosemite Village because of the Visitor Center, park offices, and various other visitor services. They arrive at the village from Curry Village or other lodging areas of the park.
24nn	The non-degradation policy is national policy based directly on the requirement of the Wild and Scenic River Act to protect designated river corridors and their values from possible degradation through the land management and development activities of federal land management agencies. The proposal to move the Tuolumne Meadows dining tent would be intended to enhance the existing river values, not to "force a higher classification."
24oo	The actions in the proposal would protect scenery and riparian habitat of the river, which the Park Service considers important to its status as a Wild and Scenic River.
24pp	The document did not specify that only commercial rafting benefited from removal of woody debris. The final document has been changed to indicate that bridge protection was also a goal of debris removal. The document notes log removal is a past management practice.
24qq	The relocation of the auto repair garage out of Yosemite Valley is a high priority of the <i>Concession Services Plan</i> , as well as an action item of the GMP. Minor repair service would be increased at several service stations, as would towing service; this would mean that not all tows would have to go to El Portal. Towing to El Portal would be a one-way operation. Ranger escorts would be provided if necessary.

COMMENTS

RESPONSES

	also increases the necessary staff and the impact of servicing motor vehicles.
24rr	40. Page 62 notes that the relocation of the wilderness/backcountry office to the Art Activity Center would create more room for general interpretation in the main Yosemite Valley Visitor Center. What about the lost interpretation provided by the Art Activity Center? The Art Activity Center is a great example of cooperation between the NPS, YA and YP&CCo. and it should be retained. Move to bank building?
24ss	41. Page 62 notes the impacts of relocating the stables. Without a plan showing how new trails impact existing trails and without a housing plan to note the relocation of the housing units, the statement regarding impacts is presumptuous. How can benefits be described without an alternative plan to evaluate?
24tt	42. Page 64 notes the impacts on 2 - 3 acres of lodgepole pine forest for the White Wolf stables. Why not close the stables?
24uu	43. In discussing the 100-year floodplain the CSP fails to note that floods are extremely predictable and generally occur in winter months, during periods of lowest visitation. Further, the structures currently in place have withstood at least one 100-year flood without significant damage. Since the 100-year floods do not cause significant deterioration to the buildings and do not result in risk or loss of life, isn't this restriction unduly stringent?

24rr	In response to public comment, the final proposal has been modified to include relocation of the art activity center to the bank building.
24ss	The document has been changed to reflect that stable management practices have reduced impacts on nearby campers from odors and insects. Scenic impacts would be reduced by moving the stables out of the glacier point viewshed and meadows are restored.
24tt	In response to public comment, the final proposal has been modified to include elimination of the stables at White Wolf.
24uu	The draft plan described the conditions under which flooding is expected. Data from the U.S. Geological Survey indicate that the 1937, 1950, and 1955-56 floods equaled 50-year flood peaks. There has not been a 100-year flood during the record-keeping period. The NPS is required to comply with Executive Order 11988, "Floodplain Management" to ensure that natural floodplain values are enhanced and that risk to life, safety, and property are minimized. The National Park Service recognizes that flooding is most likely during the low visitation period and that there is an evacuation plan in case of flooding. However, in order to comply fully with the NPS guidelines for implementing the executive order, the park will develop action plans to ensure that life, safety, and property risk is minimized to the extent possible. This may include structural mitigation of flood hazards.

COMMENTS

RESPONSES

EL PORTAL SHUTTLE SUPPORTERS
PO BX 16
EL PORTAL, CA 95318

Michael Finley, Superintendent
Yosemite National Park
P.O. Box 577
Yosemite, Ca. 95389

Dear Superintendent Michael Finley,

Thank you for the opportunity to contribute to Yosemite's welfare. From the El Portal Shuttle Proposal and Survey, an obvious need for a transportation system was recognized and overwhelmingly supported by locals. The need was confirmed by Mariposa County's Yosemite Area Visitor Survey and many other studies. Special interest groups participating in the public meeting on the Yosemite Concessions Plan topped their lists with the same concern over an immediate transportation solution.

25a

The transportation problems have risen to emergency proportions. Please implement a shuttle on highway 140 May through September with expansion plans in the near future. ~~We need to ease the car pollution burden Yosemite carries summer after summer.~~

Sincerely,

Do Dickinson

Lynda Ballerini

El Portal Shuttle Supporters
Doe Dickinson
Lynda Ballerini

Letter 25

25a See response 2b.

COMMENTS

RESPONSES

PROPOSAL FOR AN EL PORTAL-YOSEMITE VALLEY SHUTTLE

Highway 140 between El Portal and Yosemite Valley is the most heavily traveled 16 miles in Yosemite National Park. The narrow, winding road that ascends 2000 feet is the corridor shared by El Portal and Mariposa residents commuting to work and by park visitors staying in El Portal's motels. The traffic, pollution, and parking problems in Yosemite Valley caused by all these vehicles could at least be alleviated by the initiation of a regularly scheduled shuttle between Yosemite Valley and El Portal. If such a shuttle were scheduled to run every half hour from the early morning to late in the evening, many residents and park visitors who are now daily driving cars to the park would have a viable, attractive alternative.

The shuttle could run from 5 a.m. to 1 a.m. at half hour intervals. Possible stops in El Portal could include the Trailer Village, Cedar Lodge, Rancheria Flat, Old El Portal and Parkline. In Yosemite Valley, the shuttle could stop at Curry Village, the Ahwahnee, Yosemite Village and Yosemite Lodge.

COMMENTS

RESPONSES

SUPPORT FOR YOSEMITE - EL PORTAL SHUTTLE

Location of Petition	Support Shuttle	Use Regularly
El Portal Residences	119	51
National Park Service (government)	57	23
Yosemite Park and Curry Company	168	59
Other Yosemite Businesses	70	11
TOTAL	414	144

RESIDENCE AREA FOR SUPPORTERS OF YOSEMITE - EL PORTAL SHUTTLE

Location of Residence	Support Shuttle		Use Regularly	
El Portal	220	53%	108	75%
Yosemite	77	19%	1	1%
Mariposa	46	11%	25	17%
Midpines	27	7%	7	5%
Yosemite Valley	22	5%	1	1%
Yosemite Park	4	1%	0	0%
Foresta	4	1%	0	0%
Rancheria Flat	4	1%	1	1%
Indian Flat	3	1%	0	0%
Yosemite West	2	1%	0	0%
South Fork	1	0%	1	1%
Wawona	1	0%	0	0%
Cascades	1	0%	0	0%
Merced	1	0%	0	0%
Mariposa Pines	1	0%	0	0%
TOTAL	414		144	

COMMENTS

RESPONSES

ENVIRONMENT NOW

24955 Pacific Coast Highway • Suite C-201 • Malibu • California • 90265
phone (213) 456-8775 • fax (213) 456-3989

STATEMENT OF RICHARD S. LUSKIN, Executive Director of ENVIRONMENT NOW. Mr. Luskin is an environmental lawyer whose background includes several seasons as a National Park Backcountry Ranger in Glacier National Park and two years with the Peace Corps. He has also lectured for several years in environmental studies at the university level.

ENVIRONMENT NOW is a private operating foundation created by Luanne and Frank Wells. The organization is dedicated to protecting, preserving, and restoring the environment by influencing public opinion and promoting responsible resource management.

STATEMENT ON YOSEMITE DRAFT CONCESSIONS PLAN

Good evening ladies and gentlemen, my name is Rick Luskin and I am the Executive Director of ENVIRONMENT NOW, a foundation created by Luanne and Frank Wells to preserve, protect, and restore our environment. My background includes several years of practice as an environmental attorney as well as several seasons as a National Park Backcountry Ranger in Glacier National Park. Thus it is with some experience with Park Service Policy that I speak.

Our National Park System provides a special service in our post industrial society. They allow our citizens a place to escape from the backdrop of commercialism and concrete that pervades our everyday life. They allow us a place to partake in the natural rhythms of the earth and appreciate the majesty of nature. They give us perspective on our responsibilities as caretakers of this planet.

Letter 26

COMMENTS

RESPONSES

The National Park Service has a very important responsibility to protect these oases from modern life. Its mandate is clearly stated in the Organic Act-- "The National Park Service shall conserve the scenery ... and the wildlife therein and to provide for the enjoyment of the people by such means as will leave them unimpaired for the enjoyment of future generations." Simply put, the National Park Service's obligation is to ensure that the parks remain "unimpaired".

No one could disagree that Yosemite is one of the crown jewels of our nation. It was once protected by its isolation. Now, however, it lies within a days drive of over 20 million people. It is up to the service to protect it. The Park Service must abide by its obligation to keep "unimpaired" the natural temple that is Yosemite Valley.

In looking through our own files, I found an article in the September 1, 1952 L.A. Times entitled "Yosemite Charm Attracts Millions". In this article, the then Yosemite Superintendent Carl Miller stated, " Unless something is done to stop present trends, much of the natural appeal of the valley as we know it will be gone within the next 50 years." Mr. Miller's prophecy has proven true with 10 years to spare.

Personally, I don't visit Yosemite much anymore. Neither do many of my friends. As the inimitable Yogi Berra might put it, "The Park is so crowded, no one goes there anymore".

Accordingly, I have chosen to speak here to advocate the implementation of the 1980 General Management Plan rather than the Draft Concessions Plan.

COMMENTS

RESPONSES

The Park Service's proposed plan is a step in the wrong direction and will contribute to further congestion, crowding, and commercialism in the valley.

26a

In accordance with the 1980 GMP, we need to begin the reduction of private automobile traffic in the valley and promote alternative means of transportation. My friend Martin Litton took this picture of traffic in the valley in 1950. It is embarrassing that we can still see this same scene.

26b

We cannot allow new buildings to be constructed as proposed in the Draft Concessions Plan. Indeed, in accordance with the GMP, we should remove many that exist such as the garage, the concessionaire headquarters, and the concessionaire warehouse.

26c

Commercialism in the valley must be minimized, if not eliminated. In accordance with the GMP, all clothing, sports equipment, and gift sales from the village store should be removed.

Beyond implementing the GMP, I urge the Park Service to select a concessionaire interested not only in profits but one committed to preserving and enhancing the natural park experience. Ideally, the concessionaire chosen would be one that would contribute all profits to the park.

I appreciate you allowing me the opportunity to express my opinions. They echo those of the Park Service in 1980 as memorialized in the GMP. Your task then should be easy. There is only one right decision. Save the Yosemite forged by God, not the one commandeered by profiteers.

26a See response 2b.

26b See responses 1a. and 3c.

26c In the final proposal, clothing and sporting goods would not be sold at the Village store, and the gift shop would be moved to the present location of the Village Sport Shop and reduced in size.

COMMENTS

RESPONSES



January 30, 1992

TO: Yosemite National Park's Superintendent and
Representatives of Yosemite's Concessions Plan
MEETING AT FRESNO'S CONVENTION CENTER

I request an opportunity to be heard regarding the impact the new draft Yosemite Concessions Plan would have on our neighboring community of Fish Camp. I am the Chairperson of the Fish Camp Property Owners Association and would like to speak in that capacity for the maximum amount of time available.

To the extent that there is insufficient time available for me to speak, I would like to reserve time and/or be afforded the opportunity to submit written comments for the next public hearing scheduled for the Yosemite Valley. I may be reached at (209) 683-3705 (weekends) and (209) 227-8743 (weekdays/evenings).

27a

My main concern, on behalf of residents of Fish Camp, is that conservationists, businesses, Yosemite's representatives, and others who have been vocal in the arena of this ongoing debate, seem to be saying, "Don't screw up Yosemite. Screw up the neighboring communities."

Lest there be any doubt in anybody's mind, we in Fish Camp do not want to pick up the pollution, noise, destruction, and overpopulation and all of its attendant problems that undoubtedly will overflow from Yosemite should this short-sighted concessions plan be formally adopted. We, too, have a Specific Plan which governs what uses Fish Camp property may be put to--just as Yosemite's General Plan covers the park's property. We do not want, under any circumstances, to violate that very carefully-thought out Specific Plan. Many business people and uninformed politicians in the Mariposa County area think that Fish Camp should bear the brunt of the lack of overnight facilities in Yosemite, even though there is a relatively new hotel in Fish Camp that is having difficulty keeping its rooms and restaurants filled! Our growth must be, and will be, carefully watched and in sync with the sensitive wildlife and natural wonders we in Fish Camp are so fortunate to find in our back yards. Our surveys have consistently revealed a "NO MORE HOTELS" sentiment that is prevalent in Fish Camp. We may be small in size, but we will be vigilant to protect the beautiful town site we selected because of its serenity, peacefulness, and awesome natural and wildlife wonders. Fish Camp will not be the scapegoat of any individuals who are money hungry and/or otherwise blinded by the theme, "Bigger Must be Better." Only we, working together with you, can save what is left in Yosemite National Park.

Post Office Box 207 • Fish Camp, California • 93623 • (209) 683-~~3705~~ 3705

Letter 27

27a See response 13b.

COMMENTS

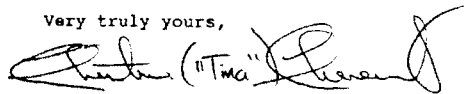
RESPONSES

January 30, 1992
Page Two

If I may be allowed, I would appreciate the opportunity to correspond with the decisionmakers in this process to further amplify the concerns of Fish Camp residents and property owners.

Thank you for your time and consideration. I look forward to speaking and corresponding with you in the future on this most important topic.

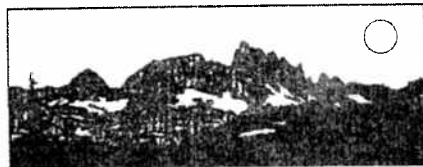
Very truly yours,

A handwritten signature in cursive script, appearing to read "Christine M. Chenevert", with the name "Christine" and the nickname "Tina" written in parentheses next to it.

Christine M. Chenevert, Chairperson
FCPOA Board

CMC/zz

cc: FCPOA Board Members and Advisors



HIGH
SIERRA
HIKERS
ASSOCIATION

P.O. BOX 9865 TRUCKEE, CA 96162

CERTIFIED - RETURN RECEIPT No. P 046 428 558

February 25, 1992

Michael V. Finley, Superintendent
Yosemite National Park
P.O. Box 577
Yosemite, CA 95389

Dear Superintendent Finley:

This letter transmits the comments of the High Sierra Hikers Association regarding your *Draft Concession Services Plan* and *Draft Supplement to Final Environmental Impact Statement for General Management Plan* dated December 1991.

The draft Concession Services Plan and DEIS ignore both the 1980 General Management Plan for Yosemite, and the California Wilderness Act of 1984, by allowing non-conforming developments at the High Sierra Camps (HSCs).

The California Wilderness Act of 1984

In drafting the California Wilderness Act, Congress chose strong language to guide management of the HSCs (potential wilderness additions). The House Committee Report on the Act (House of Representatives Report No. 98-40) states:

"The back country (now wilderness) visitor use development at Bearpaw Meadow and Pear Lake in Sequoia National Park are designated as 30 acre enclaves of potential wilderness addition, in the identical manner and with the identical treatment as is given the "high sierra camps" in Yosemite. If and when it occurs that the continued operation of these facilities in these parks at the then current acceptable operational standard results in an increased adverse impact on the adjacent wilderness environment (including increased adverse impact on the natural environment within the enclaves themselves), the operation of these facilities shall be promptly terminated, the facilities removed, the sites naturalized, and in the procedure set forth by section 9 of the bill, the areas promptly designated as wilderness. Because of the importance of continuing monitoring and assessment of this situation, immediately upon the enactment of this bill into law, the Secretary of Interior should document current baseline operational and environmental impact conditions of all of these facilities, and he should also, within one year of the date of enactment, report in

Letter 28

COMMENTS

RESPONSES

Michael V. Finley, February 25, 1992 - Page 2

writing to the relevant committee of the House and Senate, his findings and recommendations as to this matter. Annual assessments of this situation should thereafter be made by the Secretary to assure continued monitoring of conditions."

In short, Congress intended for the potential wilderness additions within Yosemite National Park (i.e., the HSCs) to be managed to allow no new developments or expansion of existing developments, and for existing facilities to be removed if increased adverse impacts should ever occur.

Bob Howard (Branch Chief, Planning and Compliance, NPS, Yosemite NP) informed us recently that the baseline (and annual) condition reports called for in the House Committee Report have never been prepared.

We are aware that the NPS constructed a new leach mound system (for wastewater) at the Vogelsang HSC in 1985, and new toilets at the Vogelsang HSC in 1991. Mr. Howard informed us that a helicopter was used to collect "local" construction material (i.e., rock) for the new toilets. When asked if the helicopter collected material from inside or outside the 30 acre enclave of potential wilderness addition, Mr. Howard replied: "probably outside" (i.e., in designated wilderness).

All of these actions are blatant violations of the intent of Congress as expressed in the legislative history of the California Wilderness Act of 1984. When the previously existing leach field and toilets began causing increased adverse impacts, the Vogelsang HSC should have been promptly removed and designated wilderness as per the intent of Congress as quoted above.

The non-conforming developments at Vogelsang HSC should be removed at once (including the leach mound constructed in 1985, the toilets constructed in 1991, and any other such developments/facilities constructed after enactment of the California Wilderness Act). Furthermore, if the Vogelsang HSC cannot then operate without causing increased adverse environmental impacts, the operation of the facilities should be promptly terminated, the facilities removed, the site naturalized, and the area promptly designated as wilderness.

Due to the high elevation, sandy soils, shallow groundwater, etc., it has become obvious that the Vogelsang HSC will continue to cause environmental problems without continual "band-aid" developments. You should simply face the facts, and remove the Vogelsang HSC as soon as possible.

The process by which the Park Service approved the construction of new toilets in the backcountry of Yosemite is particularly alarming. When staff at Yosemite concluded that the existing "jet johns," pit toilets, and flush toilets at the HSCs were causing "unacceptable" adverse impacts, they ignored the direction of Congress (as well as their own 1980 General Management Plan), and created a plan to replace the existing toilets with new ones. An environmental assessment was prepared that considered only a "no action" alternative and a "preferred" alternative (i.e., installing new toilets). A "Finding of No Significant Impact" (FONSI) was then written, which states that "... public comment was not solicited ..." because "the preferred alternative was not considered to be controversial." Apparently, staff at Yosemite

COMMENTS

RESPONSES

Michael V. Finley, February 25, 1992 - Page 3

never considered the most important alternative of all: to implement the intent of Congress as expressed in the California Wilderness Act of 1984.

National Park Service Management Policies for wilderness (Chapter 6:6, Dec. 88) state that toilets shall only be installed in wilderness "... where reducing or dispersing visitor use has failed to alleviate the problems or is impractical." Managers have apparently not even considered "reducing or dispersing visitor use," although such an approach would be very "practical" given the strong direction regarding the HSCs expressed by Congress in the California Wilderness Act.

The "Programmatic Environmental Assessment" (July 1991) that approves construction of new toilets throughout the Yosemite backcountry is only three pages long, and is undeniably inadequate for a project of such magnitude that has the potential to cause very significant impacts. The EA and FONSI should be rescinded at once. Any proposal to address problems caused by human waste in the backcountry should: 1) be consistent with the California Wilderness Act of 1984; 2) be consistent with the 1980 General Management Plan for Yosemite; 3) be consistent with NPS Management Policies for wilderness; 4) satisfy NEPA requirements; and 5) allow for public participation. The approach currently being taken by staff at Yosemite meets none of these conditions, and demonstrates a peculiar mindset: namely, that if Yosemite National Park defines its own illegal activities as harmless, then it is okay to proceed.

Any plan addressing concessioner operations within the potential wilderness additions (HSCs) must be written to implement the letter and intent of the California Wilderness Act of 1984. The current draft should be amended to incorporate the following elements:

1. Non-conforming developments (i.e., the leach mound and toilets constructed at Vogelsang HSC in 1985 and 1991, respectively, as well as any other developments that were installed at any of the HSCs subsequent to enactment of the California Wilderness Act) shall be removed at once.

2. Baseline operational and environmental condition reports will be prepared for all potential wilderness additions (HSCs) by December 31, 1992, (with opportunity for public comment on the draft reports). The "baseline" date for these reports shall be the date of enactment of the California Wilderness Act of 1984. Every effort shall be made to ascertain the baseline operational and environmental conditions present as of that date, and to identify any and all developments that occurred after that date. All such non-conforming facilities and developments shall be discontinued and removed at the earliest possible date.

3. Annual monitoring reports shall be prepared to document any changes in operational or environmental conditions within and surrounding all potential wilderness additions (HSCs).

4. No further development (i.e., installation, expansion, and/or replacement) of facilities or services shall take place within the potential wilderness additions.

5. If adverse impacts resulting from operation of any of the HSCs should ever increase to exceed documented or reasonably inferred baseline levels, the operation of the HSC shall be promptly terminated, the facilities removed, and the site naturalized and designated wilderness.

28a

The National Park Service views these developments as conforming, serving the same visitor capacities and using a more environmentally compatible solution than the previous leach field.

Additional baseline information will be developed for the High Sierra camps.

28a

COMMENTS

RESPONSES

Michael V. Finley, February 25, 1992 - Page 4

1980 General Management Plan (GMP)

The 1980 General Management Plan (GMP) for Yosemite National Park states:

"... the High Sierra camps will be reclassified as potential additions to wilderness. ... Potential wilderness classification will prevent any further development of facilities or services; should existing developments be removed, there will be no reconstruction of facilities."

The new leach mounds and toilets at Vogelsang HSC (as well as any other developments that may have occurred at the High Sierra camps after the adoption of the 1980 GMP) clearly are in violation of the 1980 GMP. The draft Concession Services Plan fails to address these violations. The following provisions should be incorporated into the draft in order to provide consistency with the 1980 GMP:

1. Non-conforming developments (i.e. the leach mound and toilets constructed at Vogelsang HSC in 1985 and 1991, respectively, as well as any other developments that were installed at any of the HSCs subsequent to enactment of the California Wilderness Act) shall be removed at once.

2. No further development (i.e., installation, expansion, and/or replacement) of facilities or services will take place within the potential wilderness additions.

Summary of Comments re: High Sierra Camps

The High Sierra Camps do not provide a necessary service to the "general" public. The HSCs exist to provide luxury accommodations (\$70+/night) for a small minority of privileged backcountry visitors. The majority of wilderness visitors and the Park's natural environment are forced to endure the impacts of the HSCs (water pollution, helicopter noise, the pollution and trail damage caused by heavy use of stock to supply the camps, etc.) solely to provide plush living conditions in a wilderness setting for the moneyed few. The High Sierra Camps are the great polluters and destroyers of the Yosemite Wilderness. Their continued existence serves only to line the pockets of the concessioner. They should be terminated at once.

The draft plan admits that adverse environmental impacts have been on the increase within at least two of the HSCs. The draft also plainly states that the Park Service's response to such impacts shall be to install new facilities and/or to expand current facilities. The draft states (page 45):

"In past years there have been problems with overload on the septic system at Vogelsang High Sierra camp. The concessioner is finishing installation of composting toilets and uses a "gray water" system for other wastewater (showers, wash water). A new leach field will be installed. At Sunrise camp, there are inadequacies in the sewage system and in potable water; work will be required in the near future."

Such an approach clearly violates the 1984 California Wilderness Act and the 1980 GMP. Any less than full incorporation of the amendments suggested above would display deliberate disregard of Congressional intent and the public trust.

Michael V. Finley, February 25, 1992 - Page 5

NEPA Compliance

The draft Concession Services Plan/DEIS violates the National Environmental Policy Act by failing to explore a reasonable range of alternatives to the proposed action. The draft Plan/DEIS also violates NEPA by failing to disclose the direct, indirect, and cumulative impacts reasonably expected to result from implementation of the preferred alternative.

Since the adoption of the 1980 GMP, scientists have learned a great deal about the role of the brown-headed cowbird in the decline of Sierra songbirds.

Cowbirds are *not* native to the High Sierra. They were absent from virtually the entire Sierra Nevada prior to 1930 (Rothstein et al. 1980), were first recorded in Yosemite Valley in 1934, and have been expanding their range ever since (Airola 1986, Gaines 1977, Rothstein et al. 1980, Rothstein et al. 1987).

The cowbirds' habitation of the High Sierra has been made possible by the presence of stock, both livestock and recreational (Rothstein et al. 1980, Verner and Ritter 1983). These animals provide a rich food base (insects associated with manure) that allows cowbirds to survive and breed successfully in harsh mountain environments. Their attraction to pack stations in the Sierra is well documented (Fleischer et al. 1987, Keys et al. 1986, Rothstein et al. 1980, Rothstein et al. 1987, Verner and Ritter 1983, Yokel 1989, and others). On the east side of the Sierra, large aggregations of cowbirds are found almost exclusively near pack stations (since cattle are less common), while in the western Sierra they are abundant at both pack stations and among herds of grazing cattle (Rothstein et al. 1980, Verner and Ritter 1983). When researchers wish to study or collect cowbirds, they invariably target pack stations and other aggregations of livestock because they are assured of finding birds there.

Cowbirds are obligate brood parasites—they lay their eggs exclusively in the nests of other birds—usually laying only a single egg (but sometimes two) in any host nest. In the eastern Sierra, individual females have been reported to lay an average of 30.5 eggs per season (Fleischer et al. 1987).

In addition, cowbirds travel 7 kilometers or more between feeding sites (e.g., pack stations, grazed meadows) and breeding sites (Rothstein et al. 1984). Thus, songbird nests in a 154-square-kilometer (55 square miles) area surrounding a pack station or grazed meadow are potentially vulnerable to cowbird parasitism.

Rates of parasitism and nest failure among host species are variable, depending on the species and the density of the cowbird population. Parasitism by cowbirds has been recorded for at least 25 Sierra bird species (Rothstein et al. 1980, Verner and Ritter 1983, Airola 1986). Of these, warblers and vireos appear to be most vulnerable. Airola (1986) reported that 16 percent to 78 percent of warbler nests (depending on species) were parasitized by cowbirds at study sites in the southern Sierra Nevada. He also found that among susceptible species, parasitized nests produced only 0.33 young per group, compared to 1.59 young per group for non-parasitized nests. Verner and Ritter (1983) reported that 23 percent of family groups of yellow-rumped warblers were parasitized by cowbirds at sites in the Sierra National Forest. Sierra birds in general are quite vulnerable to parasitism because they nest in small localized groups (Verner and Ritter 1983) and frequently do not have mechanisms for defending against cowbird parasitism, since they evolved in the absence of this threat (Airola 1986).

28b The *Concession Services Plan/Supplemental EIS* provides a reasonable range of alternatives and is in full compliance with NEPA. The purpose of the plan is to update and revise concession action items. The commenter has not provided substantive criteria of the analysis or suggested other alternatives. In reference to cumulative impacts and mitigative measures, see responses 8b and 8d.

COMMENTS

RESPONSES

Michael V. Finley, February 25, 1992 - Page 6

Clearly, cowbirds are adversely impacting songbirds native to Yosemite. The only remaining uncertainty is on the magnitude of this impact, and certainly more research is needed to determine specific rates of parasitism in specific locations.

While we cannot know the exact degree of cowbird impacts throughout the Sierra Nevada, we can make logical inferences about impact at the local level. Consider Yokel's (1989) work on cowbirds in the vicinity of the pack station at Mammoth Lakes. He captured and tagged 87 and 90 individual female cowbirds in 1983 and 1984, respectively. If we use the average laying rate for cowbirds at this site (30.5 per female; Fleischer et al. 1987), we can estimate that approximately 2,700 cowbird eggs were laid each year in the vicinity of the pack station by marked birds alone. This represents a conservative estimate of the total cowbird impact, because the authors likely captured only a portion of the total females present. Yokel (1989) also determined the population density of cowbirds in nearby breeding areas and found it to be 18 females per square kilometer. This indicates that about 550 cowbird eggs were laid per square kilometer of breeding habitat. We view even these conservative estimates as a very legitimate cause for concern about the threat cowbirds pose to native songbirds.

There are several potential solutions to the cowbird problem. Clearly pack stations and herds of cattle in the Sierra are the primary contributors to the problem. Trapping of cowbirds has been suggested as one alternative; however, attempts to remove cowbirds by trapping proved futile at the Wishon Pack Station in the Sierra National Forest, despite the fact that the capture of cowbirds is relatively simple (Rothstein et al. 1987). The reason? Cowbirds were simply too abundant. Removal of 125 birds resulted in little effect on the total cowbird population in the area, partly because grazed meadows provided additional food sources for cowbirds.

The only fail-safe way to eliminate the cowbird problem is to remove the source of food that has allowed them to expand their range. This means removing pack stations (and cattle) from the Sierra. Most cowbirds leave the Sierra Nevada following the peak breeding season of native birds (from May through July). A potential alternative to complete elimination of pack stations (and cattle) would be to delay operation of pack stations (and release of cattle) until after the conclusion of the cowbird breeding season in early August. Neither of these options would necessarily limit recreational stock use by private individuals; impacts are most critical where stock density is sufficiently high to attract the birds.

The draft Concession Services Plan/DEIS mentions the plight of songbirds, and the role of cowbirds, but it falls far short of meeting the NEPA requirements of assessing the direct, indirect, and cumulative impacts expected from implementation of the preferred alternative.

The proposal to relocate pack stations at Tuolumne Meadows, White Wolf, and Yosemite Valley may have significant effects on songbird populations. These impacts must be disclosed.

Two additional alternatives should be evaluated in detail:

1. Elimination of the existing stables at Tuolumne Meadows, White Wolf, and Yosemite Valley.
2. Allowing operation of the stables only after the conclusion of the cowbird breeding season.

Your cumulative effects analysis must consider the combined effects of human activities (including urban development, logging, grazing, operation of pack stations, etc.) on the

COMMENTS

RESPONSES

Michael V. Finley, February 25, 1992 - Page 7

declining songbird populations of the Sierra Nevada. This must include analyses of activities both within and outside of Yosemite National Park.

The draft Plan/DEIS states (on page 5) that: *"Some activities have a traditional role, but they should be evaluated for effects on resources or on other visitor activities."*

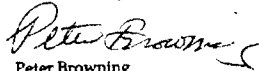
We agree completely. The traditional methods of stock use in Yosemite must be seriously reconsidered based on recent research that shows pack stations/stables to be hubs of cowbird activity. Concession-operated stables do not provide a necessary service to the general public. Expensive horse "rides" may be profitable for the concessioner, but they are certainly not a "Park dependent" activity. Furthermore, most hikers object to the manure, dust, and flies that result from the use of trails by livestock. The small minority of Park visitors who desire to ride a horse should not be allowed to degrade the experience of the vast majority of visitors, who choose to see the Park on foot. Again, in the words of your draft Plan: *"Some activities have a traditional role, but they should be evaluated for effects on resources or on other visitor activities."*

Modest use of livestock for essential administrative purposes may be necessary, but mitigation measures could be explored, such as keeping stock at lower elevations until the songbird breeding season is over.

Conclusion

While we support some of the provisions of the draft Plan (i.e., restrictions on souvenir sales and elimination of "pony rides"), the draft is deficient in many respects. We respectfully request that the inadequacies presented in this letter be fully addressed in your final Plan.

Yours sincerely,



Peter Browning
Coordinator

cc: The Honorable George Miller, Chairman
House Committee on Interior and Insular Affairs

COMMENTS

RESPONSES

Michael V. Finley, February 25, 1992 - Page 8

REFERENCES CITED

- Airola, D.A. 1986. Brown-headed cowbird parasitism and habitat disturbance in the Sierra Nevada. *J. Wildl. Manage.* 50:571-575.
- Fleischer, R.C., A.P. Smyth, and S.I. Rothstein. 1987. Temporal and age-related variation in the laying rate of the parasitic brown-headed cowbird in the eastern Sierra Nevada, California. *Can. J. Zool.* 65:2724-2730.
- Gaines, D. 1977. *Birds of the Yosemite Sierra: a distributional survey.* Oakland, CA, Syllabus.
- Keys, G.C., R.C. Fleischer, and S.I. Rothstein. 1986. Relationships between elevation, reproduction and the hematocrit level of brown-headed cowbirds. *Comp. Biochem. Physiol.* 83A:765-769.
- Rothstein, S.I., J. Verner, and E. Stevens. 1980. Range expansion and diurnal changes in dispersion of the brown-headed cowbird in the Sierra Nevada. *Auk* 97:253-267.
- Rothstein, S.I., J. Verner, and E. Stevens. 1984. Radio-tracking confirms a unique diurnal pattern of spatial occurrence in the brood parasitic Brown-headed cowbird. *Ecology* 65:77-88.
- Rothstein, S.I., J. Verner, E. Stevens, and L.V. Ritter. 1987. Behavioral differences among sex and age classes of the brown-headed cowbird and their relation to the efficacy of a control program. *Wilson Bulletin* 99(3):322-337.
- Verner, J., and L.V. Ritter. 1983. Current status of the brown-headed cowbird in the Sierra National Forest. *Auk* 100:355-368.
- Yokel, D.A. 1989. Intrasexual aggression and the mating behavior of brown-headed cowbirds: their relation to population densities and sex ratios. *Condor* 91:43-51.

COMMENTS

RESPONSES

Highway Association

P. O. Box 1263
Groveland, California 95321

Whereas Yosemite National Park is considering amending it's General Plan

And Whereas this plan includes the elimination of 428 tent cabins and replacing them with 144 new motel units at Camp Curry

And whereas this plan includes increasing the restaurant seating and creation of a "fast food" operation in the Degnan Building.

29a

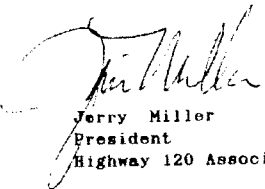
29b

It is the position of Highway 120 Association, Inc. that:

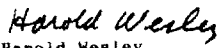
1. No new motel units be constructed at Camp Curry.

2. Any change in food service operations should not include any enlargement of existing or creation of new buildings.

Discussion:


Jerry Miller
President
Highway 120 Association, Inc.

January 30, 1992


Harold Wesley
Chairman
Political Information Committee
7647 Hwy 120
Groveland, Ca 95321

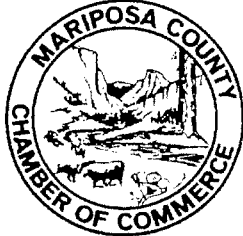
Letter 29

29a The draft document did not include a proposal for new motel units at Curry Village. Also see response 1a.

29b See response 3d.

COMMENTS

RESPONSES



Mariposa County Chamber of Commerce

Post Office Box 425
Mariposa, California 95338
209-966-2456

February 26, 1982

Mr. Michael Finley, Superintendent
YOSEMITE NATIONAL PARK
P.O. Box 577
Yosemite National Park, CA 95389

Dear Superintendent Finley:

The Mariposa County Chamber of Commerce wishes to express its appreciation to the National Park Service for the opportunity to review and comment on the Park's Concession Services Plan. We find a number of positive elements in both alternatives A and B, but there are critical elements which are missing. To make a judgment on the adequacy of the Plan, additional information and studies are vital. Such elements include a transportation study, the Employee Housing Plan, a study to determine the economic effects of the Plan on the region, and a time frame for implementation.

1. Narrow mountain roads, limited parking, and the concerns for the environment point to the need for a regional transportation study that would target traffic congestion solutions in the Park and surrounding areas.

2. We favor the re-location of employee housing to a less environmentally effective area, but the Housing Study needs to be made public at the same time as the Concession Services Plan so that we could understand the relationship of the two documents with each other and assess the impacts on Mariposa County.

3. There is a need to study the economic effects of the Plan on the region and, in particular, the stresses it might put on county services and support as well as effects on out-of-Park businesses, either positively or negatively.

4. The timing of the implementation of the Plan would also be critical to both the county government and local businesses. Of major concern is the need to address the Park's ever-increasing congestion and commercialization within a regional context that involves businesses and county government. These are resources which must be involved in the planning process so that changes within the Park do not prove to be devastating or over-burdensome to

Letter 30

30a See responses 2b and 18a.

30b See response 13b.

30c See responses 2b and 13b.

COMMENTS


RESPONSES

February 28, 1992
Page Two

The Chamber of Commerce, which has over 300 members, could serve as a liaison to local businesses and civic leaders within the county outside of the Park and would be willing to serve as a planning conduit for the Park's long-range objectives. Similar concerns to ours have been expressed by the County government as well as the Mariposa Lodging Council, which is a committee of the Chamber of Commerce.

We are well aware that the planning efforts undertaken by the National Park Service and Yosemite produce inevitable controversy due to the divergent views of many individuals and groups. Under these conditions, determining a course of action can be difficult and frustrating. If the Chamber of Commerce can provide assistance in any way, please do not hesitate to call on us.

Sincerely,


Neal O'Donel-Browne
Acting President

NODB/jk

COMMENTS

RESPONSES



Marriott's Mariposa Lodge at Yosemite

1127 Highway 41
Box 159
Fish Camp, California 93623
209/683-6555
FAX 209/683-6684

February 18, 1992

Mr. Michael V. Finley
UNITED STATES DEPT OF THE INTERIOR
National Park Service
P.O. Box 577
Yosemite National Park, CA 95389

Dear Mr. Finley:

We the representatives of the Mariposa Lodging Council support the following position on the Yosemite Park Concession Services Plan.

1. Our Comments must be prefaced with an opinion about the Park and it's relationship to the people: That is the Park should serve its owners, the American public.
2. Yosemite must be viewed in the context of regional impact, not confined within the borders of the National Park.
3. While all of the other environmental and economic considerations would undoubtedly benefit from this consideration, lodging and transportation are fundamentally involved on a regional basis when dealing with a Park assessment. Our concern is that this plan may fall short in considering the regional implications.
4. Beyond the inter-park transportation requirements, the community-wide transportation loop needs to be expedited so that staff and tourist alike can travel from Mariposa to Oakhurst to Fish Camp to the Valley floor and back to Mariposa in a continuous loop, as well as including a Coulterville Loop. When in place, such a system would alleviate the need for some employees housing and many passenger trips by private automobile.
5. We recognize that the plan in review does not address transportation needs, but as this concession contract is crafted, do not miss the opportunity to consider the role the concessionaire must play in welcoming outside clientele from "competing" hotel/motel and bed & breakfast properties, versus treating the public from these establishments as adversaries and inhibiting smooth transportation for all.

Letter 31

31a See responses 2b and 13b.

31a

COMMENTS

RESPONSES

Page 2
Letter to Michael Finley
Concession Services
February 18, 1992

6. We are encouraged that future decreases in lodging would occur based upon the recommendations of the 1980 General Management Plan. The free enterprise system will fill the need for lodging outside the Park.

31b

7. Most of the Lodging products outside the Park run an average of 60% occupancy. This would indicate there is no need to increase motel accommodations in the park with baths. Overall, we support NPS-48 outlined below:

(e) PRIVATE ENTERPRISE OUT-OF-PARK, Chapter VIII:

If adequate facilities exist or can feasibly be developed by private enterprise to serve the park visitors' needs for commercial services outside of park boundaries, such facilities shall not be expanded or developed within park areas. The Service shall cooperate with State and local governments to develop the recreational region around major parks in a manner designed to meet the visitors' needs without degradation of the non-park environment or loss of quality of the visitor experience through uncontrolled and unregulated growth.

31c

8. The National Park Service should consider requiring a regional approach to housing inquiries. Currently, Lodging outside the Park is unable to access unaccommodated guests who call into the Yosemite Lodging System when rooms are unavailable inside the Park. A spirit of regional cooperation will provide people with a better Yosemite experience, allow the local economies to capture the tourist dollar and tax revenues, and will help disperse the density to the outlying hotels.

31b

Under the final proposal the overall amount of lodging in the park would be reduced. The replacement of lodging units with rooms with baths would have a negligible effect on outside lodging operations because the availability of winter units within the park would increase by about 90 rooms, to be constructed over a period of time.

31c

This is an operational matter to be considered by the park and concessioner.

COMMENTS

RESPONSES

Page 3
Letter to Michael Finley
Concession Services
February 18, 1992

Thank you for taking time to review our position and presenting the information to the National Park Service.

<u>Paul D. Boyle</u>	<u>Rhett Boyle</u>
<u>Ernie Lawrence</u>	<u>George B. Lynch for</u>
<u>Thomson</u>	<u>Granite West Concessions</u>
<u>Carol Shackley</u>	<u>_____</u>
<u>Linda B. Smith</u>	<u>_____</u>
<u>Ann Hammer</u>	<u>_____</u>

COMMENTS

RESPONSES



RUSSELL D. BUTCHER
Southern California Representative

February 25, 1992

RE: YOSEMITE DRAFT CONCESSION
SERVICES PLAN

Mr. Michael V. Finley
Superintendent
Yosemite National Park
California 95389

Dear Mr. Finley:

National Parks and Conservation Association (NPCA), a 285,000-member nonprofit organization founded in 1919 to promote the protection, enhancement, and public understanding of the National Park System, appreciates this opportunity to offer comments on the Yosemite National Park draft Concession Services Plan.

We offer the following suggestions to support the 1980 General Management Plan (GMP) goal of de-urbanizing and de-commercializing the park, enhancing the park's ecological processes, and improving the visitor's experience of the natural environment. We do not endorse the plan in its current form.

PRIORITIES, DEADLINES & FUNDING

NPCA is concerned that the Concession Services Plan draft is extremely vague regarding such matters as: (1) priorities and time frames for implementing the various proposed actions; (2) the interrelationship of projects and anticipated sources of funding; (3) cost figures of individual elements of the Proposed Action; and (4) environmental and other relevant criteria by which the importance and relative priority of the Proposed Action's elements can be evaluated. While we understand that individual projects would be "subject to approved planning and compliance," funding availability, etc., we nevertheless urge that the document be more specific about implementation processes, timing, funding, etc. As it is, the wording of the plan in these respects is so vague that it is as if all of these objectives may not be much more than a pleasant hope. Commitment to achievability ought to be

(more)

National Parks and Conservation Association
Box 67, Cottonwood, Arizona 86326
(602) 634-5758

Letter 32

COMMENTS

RESPONSES

2-NPCA re Yosemite draft concession services plan

clearly articulated so that there is no doubt in the public's mind that this is a serious proposal to be implemented by such-and-such means, with anticipated funding sources and completion deadlines indicated.

RECREATIONAL FACILITIES

32a

We applaud the Proposed Action's intention to remove the Ahwahnee Hotel tennis courts and the Curry Village ice-skating rink, both of which NPCA has long viewed as inappropriate recreational facilities that are attractions in and of themselves that conflict with the fundamental purpose of Yosemite National Park.

32b

However, to be consistent with the earlier removal of the Ahwahnee Hotel golf course and with similar actions soon to occur in other national parks, we strongly oppose retention of the Wawona Hotel golf course and tennis courts. These resort-type recreational attractions do not belong in a national park, and we urge that they be eliminated. The time is long overdue for finally restoring these areas in Yosemite to a natural condition.

32c

We also emphatically believe that it is time to convert the downhill ski facilities at Badger Pass to a park-appropriate cross-country ski center, as is soon to occur at Sequoia National Park's Mt. Vernon ski area. As with golf courses, tennis courts, and other resort-type recreational attractions, mechanical downhill ski facilities should no longer intrude upon the natural environment of the national parks. Nor should they attract visitors who simply come to the park because those man-made attractions are there. Downhill ski facilities, golf courses, and tennis courts are available outside the parks. The time is right, in the context of this important concession services planning process, to terminate all of these resort-type facilities at Yosemite. Furthermore, eliminating the downhill ski facilities at Badger Pass would be consistent with actions not only at Sequoia, but at Rocky Mountain National Park's Hidden Valley. Clearly, the NPS should be consistent on downhill facilities by removing them throughout the National Park System.

OVERNIGHT LODGING

Consistent with the vision of the 1980 GMP, the bottom line on overnight lodging in Yosemite Valley is to achieve a substantial reduction in the overall "footprint" of structures and urban sprawl and to restore a meaningful proportion of the Valley to a natural condition. We support, therefore, the overall thrust of the draft Concession Services Plan to the extent that it proposes to go beyond the 1980 GMP in reducing sprawl and the total number of structures. Notably the Proposed Action--through its 20 percent Valley lodging reduction target (the 1980 GMP's target was

(more)

32a

See response 24gg.

32b

The GMP calls for the retention of the golf course and tennis courts. The final proposal reaffirms this decision at this time; however, retention of these activities would be reconsidered as similar services were developed near the park or as impacts on park resources might dictate their removal.

32c

The Badger Pass area would continue to be used for skiing under the final proposal; however, skiing operations would be reviewed periodically to determine if activities should continue or be modified as environmental considerations, use, and economics might dictate.

COMMENTS

RESPONSES

3-NPCA re Yosemite draft concession services plan

17 percent) and re-configuration of lodging--would remove a larger proportion of the existing slummy urban sprawl and achieve a significantly larger area of habitat restoration in the Valley than would occur under the 1980 GMP.

NPCA has long expressed support for the idea of reducing the congested sprawl of tent-cabins at Curry Village. In the NPS-hosted Yosemite "walk-through" in November 1989, we urged a major reduction in the more than 400 tent-cabins. In August 1991, our scoping comments on the Concession Services Plan suggested a 50 percent reduction--to somewhere around 200 of these accommodations.

The draft plan now proposes reducing them to around 100 by eliminating roughly three-quarters of the tent-cabins. A reduction in the range of anywhere between 50 and 75 percent would certainly produce a long-overdue, major visual and ecological enhancement of this important part of Yosemite Valley. We strongly favor such a reduction.

We have likewise long advocated the removal of at least some of the cabins-without-bath from the Merced River riparian habitat and floodplain area. Since some of these small cabins apparently still have useful life, we suggest that at least a few of them (but not the less attractive prefabs) be retained at the lodge in environmentally and logistically suitable locations or be moved over to Curry Village or elsewhere, as their usefulness may dictate.

Part of the draft Concession Services Plan's proposed re-configuration of lodging facilities calls for building back some structures at the lodge and at Curry Village. These new buildings would provide consolidated rooms-with-bath, which unit-for-unit would occupy less acreage as well as an overall smaller "footprint" of structures in the Valley than would retention of a comparable number of existing individual cabins-without-bath or tent-cabins.

Essential aspects of building back new structures are that they be sensitively sited where structures have previously been situated and that they occupy less than the existing overall structures footprint. All innovative ideas should be carefully explored, including the possibility of expanding or adding onto existing structures in some way. Any new or retrofitted buildings should also have the lowest possible environmental impact. They should be sensitively sited, designed, and constructed--applying the latest available, appropriate state-of-the-art technologies and techniques.

NPCA is not enthusiastic about the NPS's proposal to build new structures in Yosemite Valley. However, we do recognize that there is an important potential net gain in terms of reducing

(more)

32d

To the maximum extent possible, siting of new facilities would be in previously disturbed areas. Site-specific development concept plans with additional environmental compliance would be undertaken before construction could begin.

32d

COMMENTS

RESPONSES

4-NPCA re Yosemite draft concession services plan

32e

unsightly urban sprawl and the overall footprint of structures. Furthermore, there is a major problem with the proposed lodging plan, as we view it: it lacks essential justifying data and explanations regarding the particular mix of lodging being proposed, the amount of land that would be freed up for habitat restoration, and the socioeconomic and environmental impacts of this lodging re-configuration. The plan is unfortunately especially weak in explaining why, how, and where such new lodging would be constructed.

We urge that the final plan needs enhancement in this regard, to answer such vital questions as: Exactly how many new lodge structures would be built (there may in fact be a number of possible scenarios)? How many acres would become available for restoration to a natural condition? What is the justification for building new motel-type structures? Are there options for reducing the number of new structures, such as: (1) retaining some of the still usable cabins-without-bath and/or eliminating somewhat fewer of the tent-cabins; (2) adding additional rooms-with-bath units to existing motel-type structures; or (3) some other re-configuration scenario that has not yet been proposed that could eliminate the need to construct as many or any new buildings?

The Proposed Action should also address the socioeconomic impact of the proposed lodging mix, especially with regard to keeping the park economically available to visitors from a range of income levels. It is important that there be a careful evaluation of low-end-of-the-spectrum demand so that the lodging mix will reflect that reality. Several other parks, including Zion and Bryce Canyon, recently eliminated entirely the low end of the spectrum accommodations. We want to be assured that something similar does not happen at Yosemite.

In sum, the NPS needs to do a much better job of justifying its proposed course of action and explaining the trade-offs involved. Once this is done, NPCA would be in a better position to judge the overall merits of the lodging plan for Yosemite Valley.

32f

Regarding the proposal to expand lodging at Wawona Hotel back to its historic level, we have no particular objection to doing so, subject to appropriate environmental safeguards and architectural standards, and subject to an adequate available water supply. But we do ask: Cannot the nearby accommodations outside the park adequately meet the lodging needs that would be provided by this proposed course of action? The NPS should be able to answer this question, especially since NPS concessions management policy states a preference for out-of-park services if such services exist or if feasible to develop them.

FOOD SERVICE

While we agree with the theoretically worthy objective of

(more)

32e

In response to public comment, the final proposal for lodging has been revised and additional data provided. The draft plan included an estimate of the habitat to be restored.

32f

In response to public comment and in light of additional accommodations near the south end of the park, the final proposal does not include expansion of lodging at the Wawona Hotel.

COMMENTS

RESPONSES

5-NPCA re Yosemite draft concession services plan

removing Degnan's building, as called for under the 1980 GMP, as a way of reducing the footprint and congestion of structures in the Yosemite Village area, we are concerned about the increase in day-use visitation since 1980 and the demands this increase has placed upon the park's meal-service facilities. We are also concerned about congestion and delays for service at meal-service outlets and about the necessity of visitors having to move around the Valley to obtain food.

32g

The Concession Services Plan proposes keeping Degnan's, a recommendation that has generated lots of controversy because it reverses the 1980 GMP decision to remove this structure. Unfortunately, the draft plan provides virtually no supporting data to help justify this reversal. The plan needs to be improved with the addition of information and explanations showing how many meals must be provided at which facilities and at what times in order to provide visitors with an efficient, convenient level of meal service.

32h

We also recommend that the NPS hire a highly competent food-service consultant (one not in any way connected with the present concessionaire) to certify that the NPS plan is the best one and is based upon accurate assumptions regarding visitor meal needs. If there are any extraneous food-service outlets, this would need to be made public. If there are not, then this, too, should be clearly explained and supported with credible data.

With all the discussions about moving some employees out of the Valley and reducing the overnight lodging target by 20 percent, it just may be too soon to make any final decision at this time concerning the appropriate level of meal services. It is possible that lowering overnight lodging, moving some employees out, and even reducing the ceiling on the number of motor vehicles allowed into the park on peak days could result in the elimination of a food-service outlet, at Degnan's or somewhere else.

We are not convinced that the Curry Village cafeteria should be converted to a sit-down restaurant. Properly designed and operated cafeterias can serve more meals per hour than a regular restaurant. The plan needs to explain why the existing cafeteria should not be retained and its quality of operation simply improved. The pod-style of cafeteria at Grand Canyon South Rim's Maswik Cafeteria offers an instructive and successful example worthy of consideration at Curry Village. It may also be possible to open additional lunch services at Yosemite Lodge, to help meet the noontime demand.

Regarding several other meal service changes being proposed, we favor relocating the Tuolumne Meadows diningroom and kitchen to an environmentally appropriate site away from the vicinity of the Tuolumne River. We urge that the document indicate the proposed relocation site and we strongly recommend architectural design that is harmonious with the Tuolumne Meadows setting.

We favor relocating the Glacier Point snack bar back from the

(more)

32g

The National Park Service intends to use a food-service consultant in the redesign of food services. Available and gathered food service statistics will be used in this effort.

32h

See response 3d.

COMMENTS

RESPONSES

6-NPCA re Yosemite draft concession services plan

main overlook vicinity to an appropriate site within the parking area. We urge that the document indicate where this structure would best be situated.

If the lodging expansion at Wawona Hotel is ultimately carried out, we would have no particular objection to the addition of a coffee shop to "help relieve congestion in the existing dining room." We would likewise have no objection to the addition of a new dining facility at White Wolf "to adequately serve existing use and increased demand from the expanded campground as proposed in the GMP."

MERCHANDISING

Regarding the gift shop operations, we strongly favor the Proposed Action's intention to offer only those gift shop items that have a meaningful relationship to Yosemite National Park; to national parks in general; to relevant natural and/or cultural themes of the region; or to environmental education and protection themes. While the overall quality of merchandise has tended to improve over the past years, there is still room for improvement, especially in this time of increasing environmental awareness.

We strongly urge that concession enterprises within the national parks should not cater to and cultivate the lowest common denominator of public taste, but rather should look for creative ways to sell appropriate items at various price ranges. The bottom line is that gift shop merchandize should serve as a tasteful and where possible an educational extension of what the national park experience is intended to be--that is, there should be an appropriate relevance to the fundamental mission of the National Park System and environmental awareness.

Yosemite should, in fact, be the model for the entire National Park System in demonstrating that gift shops can profitably sell appropriate items that reinforce the visitor's experience and broaden his or her cultural and environmental knowledge. Toward this end, we strongly urge that Yosemite develop a written merchandising policy that will serve as a model for other parks.

Of the specific gift shop changes being proposed, we favor eliminating the gift shop operation at Glacier Point, to reduce the overall commercial presence at this magnificent location. There are adequate merchandise outlets elsewhere in the park to fully justify removal of this particular sales outlet.

SHUTTLE SERVICE

The Proposed Action states that "shuttle bus systems would be analyzed for the possible expansion or improvement of service."

(more)

32i

In response to public comment, the final proposal has been revised to eliminate the gift shop at Glacier Point.

32i

COMMENTS

RESPONSES

7-NPCA re Yosemite draft concession services plan

We strongly urge that a far more emphatic commitment to expanded and enhanced shuttle service be made in the plan. It is both unfortunate and unhelpful that the park's transportation plan is not completed simultaneously with the Concession Services Plan draft, so that the two plans could be evaluated jointly by the public. These plans are obviously inexorably interrelated.

32j

Enough is already known, however, to enable the concession plan to explicitly state the urgent need for expanding shuttle service Valley-wide, and to other key points of the park at least during the high visitation season.

PRIMARY CONCESSION SUPPORT OPERATIONS

We continue to support the 1980 GMP's goal of removing the concessionaire's park-wide headquarters functions from Yosemite Valley; that is, removing those administrative operations that are not essential to the Valley district. The draft plan explains that "The location of the concessioner's headquarters would be determined through the park housing plan." It is our understanding that the Housing Plan has been completed. It should be released so that the question of where to locate the concession headquarters can be fully addressed.

Concerning the relocation of the park-wide concession headquarters, we support this goal, as called for in the 1980 GMP. This goal is consistent with Fred Harvey Company's headquarters move of several years ago from the crowded South Rim of Grand Canyon National Park to the nearby city of Flagstaff, and with TW Recreational Services, Inc.'s headquarters for North Rim Grand Canyon, Zion, and Bryce Canyon at Cedar City, Utah.

We favor the Proposed Action's goal of moving the Yosemite concessionaire's marketing, sales, and data processing operations out of Yosemite Valley. For those "necessary" Yosemite Valley District concessionaire functions--warehouse (reduced), maintenance shops, recycling center, security office, employee uniform center, and employee housing, payroll and personnel offices--we view as logical the consolidation of all these within a single building. To accomplish this objective, we believe it is preferable to retain the existing warehouse structure, as proposed in this document, rather than tearing it down and building a costly new structure, as was called for in the 1980 GMP.

STABLES

32k

We oppose the draft plan's proposal to move the stables from near the campground to a location near and often upwind from Curry Village. We urge that the document fails to adequately justify this relocation; nor does it indicate the impact this move might have upon Curry Village or upon the health of the

(more)

32j

In response to public comment, in the final proposal more emphasis has been placed on the commitment of the National Park Service to shuttle service expansion.

32k

See response 24u.

COMMENTS

8-NPCA re Yosemite draft concession services plan

horses (shade). Furthermore, shouldn't the NPS address the desirability of consolidating the concessionaire and NPS stables? At the least, the plan to relocate the concessionaire's stables operation needs to be supported with more data so that the public can determine whether the proposed move would be worth the costs and benefits.

HEALTH AND SAFETY CONCERNS

We understand that part of the justification for removal of some tent-cabins and other lodging structures may involve health, public safety, privacy, and criminal activities (drugs, for instance). These specific concerns and justifications should be expressly stated in the document to give added support to the lodging re-configuration plan.

321

CRANE FLAT WINTER PLAY AREA

We support the Proposed Action's rejection of a "winter play area" at Crane Flat as a decision that is consistent with sound park protective management, as well as for the reasons specified in the plan.

32m

EMPLOYEE SERVICES

Regarding the "Services for Employees," it is unfortunate and unhelpful that the Housing Plan is not available for public review simultaneously with this plan. The two plans interrelate and need to be evaluated jointly.

SPECIAL EVENTS

We agree with the Proposed Action that weddings and other special events should be reduced or eliminated, depending on the season and visitor-use level, so that functions will have no impact upon regular visitation and so that already congested conditions are not exacerbated by these kinds of group gatherings and events.

HIGH SIERRA CAMPS

Both the House Committee report on the California Wilderness Act of 1984 (Report #98-40, pp. 50-51) and the 1980 GMP indicate the potential for eventual elimination of one or more of the High Sierra Camps and the expansion of the park's wilderness to include those sites. Both documents also indicate there is to be no expansion of the man-made facilities at these camp locations, and that if current camp operations result in increased harmful impacts upon the adjacent wilderness, the operation of the one or more of these camps is to be terminated, the existing developments to be removed, and the area(s) added to officially established wilderness of the park.

(more)

RESPONSES

321

Health and safety concerns are addressed in the plan section of the draft document.

32m

The draft plan did not include winter recreation facilities at Crane Flat because of recent inconsistent snow levels and the cost of providing utilities. However, the area does receive winter use as snow conditions have allowed during the recent drought. The final plan recognizes this use and proposes to winterize the store and gas station for visitors to this area by replacing generators with power lines. In lieu of the 200-car parking lot proposed in the GMP, parking would be available at existing parking locations, some of which might be enlarged or relocated. The final proposal represents less impact on the area than envisioned earlier, with the only development being the use of the store and gas station in the winter and improved parking in the area.

9-NPCA re Yosemite draft concession services plan

32n

Since 1980, certain improvements have been made upon at least one camp (Vogelsang). We suggest that the Concession Services Plan should acknowledge these changes. Are they in fact new developments not within the scope of the 1980 GMP? Or do they merely constitute routine repair of water treatment facilities at the basic existing camp? The draft plan does not mention this question, but should. Likewise, we urge that the Concession Services Plan should include a commitment to perform annual baseline condition reports (as called for in the House Committee report cited above) on these camps, as an important way of monitoring whether these facilities should be retained or removed.

NEGOTIATIONS RECOMMENDED

The draft Concession Services Plan has clearly caused intense controversy, largely, we believe, because of its deviations from the 1980 GMP without providing adequate detailed justifications for the changes. In addition to providing these justifications and supporting data, we believe that--to avoid or at least reduce the level of polarization over the plan--the NPS should seriously consider bringing together, on site, a group of particularly well qualified park conservationists to discuss and help negotiate meaningful, achievable solutions to the important issues raised by the draft plan. We believe that such dialogue might well yield a worthy consensus and perhaps even some positive new ideas--especially with the consultative involvement of lodging and other relevant experts, as occurred at the May 1990 Transportation Workshop, in which transportation experts helpfully participated.

Such a negotiational gathering should include the best possible experts in environmentally sensitive site planning; in park-harmonious architectural design; in the use of environmentally compatible materials, lighting, heating, plumbing, and other systems; experts in construction; and experts in meal services.

We stand ready to do our part to help form a credible dispute-resolution process that will help produce a final Concession Services Plan for Yosemite National Park that the majority can support and that will be a worthy model for other national parks.

SECOND DRAFT PLAN RECOMMENDED

Given the comments we are offering and given the comments of others, we strongly urge that a second draft Concession Services Plan document should be prepared and presented to the public for review. We also strongly urge that such a revised draft plan should be issued simultaneously with the draft Housing Plan and any other relevant park plans that may be available within the time-frame needed to prepare a second Concession Services Plan draft.

(more)

32n See response 28a.

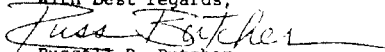
COMMENTS

RESPONSES

10-NPCA re Yosemite draft concession services plan

National Parks and Conservation Association appreciates this opportunity to review and respond to the draft Concession Services Plan. We look forward to continuing involvement with the planning process.

With best regards,



RUSSELL D. BUTCHER
Pacific Southwest Regional Director

RDB/prb

cc: Mr. James M. Ridenour,
Director NPS
Mr. Stanley T. Albright,
Regional Director NPS
NPCA Headquarters

COMMENTS

RESPONSES



Working for the Nature of Tomorrow

NATIONAL WILDLIFE FEDERATION, 1400 Sixteenth Street, N.W., Washington, D.C. 20036-2266
Office of the President

January 24, 1992

Mr. Michael V. Finley
Superintendent
Yosemite National Park
P.O. Box 577
Yosemite National Park, CA 95389

Dear Mr. Finley:

Thank you for the opportunity to comment on the National Park Service's Draft Concession Services Plan/Supplemental Environmental Impact Statement for Yosemite National Park. The Park Service is to be commended for affording the public the opportunity to provide input into this vital management decision, and I hope by doing so has set a precedent for future public participation in the concession policies of other Park units.

Although we are pleased that the Park Service has asked for public input on the draft plan, we are generally disappointed with the proposal, which has departed from Yosemite's General Management Plan in several significant ways. The primary mission here should have been to reduce the level of commercialization currently afflicting the Park, and to provide alternatives to heavy reliance on autos for access to the Park. Unfortunately, the draft Plan fails to address these two key issues, and will result in a perpetuation of both problems into the indefinite future.

33a

In particular, we urge the Park Service to aggressively pursue the goal of the General Management Plan to eliminate automobiles within the Park by the end of this century. To do so would represent a vital step toward enhancing the quality of the experience of Yosemite for all visitors by reducing traffic jams, air pollution, and the suburban mall-like atmosphere that has been allowed to disrupt the natural serenity and splendor of the Valley floor.

33b

With respect to commercial facilities within the Park, I am disappointed to note that the draft plan calls for the construction of 299 new motel units. In addition to continuing to encourage the use of private automobiles for accessing the Park, these units will be relatively highly priced lodging facilities, replacing the 326 tent-cabin sites that will be removed.

Printed on Recycled Paper

Letter 33

33a See response 2b.

33b See response 9b.

COMMENTS

RESPONSES

Mr. Michael V. Finley
January 24, 1992
Page 2

33c

Moreover, it is clear that the draft concession services plan contradicts the General Management Plan with respect to recommended dining facilities. Where the General Management Plan calls for a decrease in dining facilities of 29.5%, the draft concession services plan calls for an increase in food service

33d

seating capacity of nine percent. In addition, only two of four commercial buildings recommended for removal in the General Management Plan are recommended for removal in the draft concession services plan, and clothing and sporting goods stores would be allowed to remain.

Given the above, it is apparent that the draft concession services plan undermines the spirit and intent of the 1980 General Management Plan. I recommend that the Park Services develop another preferred alternative which more closely tracks the General Management Plan, and permit another round of public input before the concession services policy is finalized.

Thank you once again for the opportunity to comment on the draft concession services plan for Yosemite National Park.

Sincerely,

Jay D. Hair
JAY D. HAIR

JDH:da
cc: Rudy Schafer

33c See response 3d.

33d See response 3c.

Pacific Advocates*Analysis, Strategy, Action*

January 27, 1992

Michael Finley
Superintendent
Yosemite National Park
P.O. Box 577
Yosemite National Park, CA 95389

Dear Mr. Finley:

Thank you for the opportunity to comment on the Concession Service Plan Environmental Impact Statement/Draft Plan/Draft Supplement to Final Environmental Impact Statement For General Management Plan dated December 1991.

As a draft Concession Service Plan this document is woefully insufficient. The document fails to:

1. Respond to Congressional oversight direction,
2. Provide definite concession requirements with measurable deadlines, and
3. Act upon the Inspector General recommendations.

As a draft Supplement to Final Environmental Impact Statement For General Management Plan it fails to comply with the National Environmental Policy Act. Broad generalizations are made regarding impacts without supporting data. Major revisions to the General Management Plan (GMP) are disguised through camouflaged presentation of the data.

Since the early 1970's the General Accounting Office and Congress have railed at the indifference displayed by the Park Service in effectively managing the concessionaire in Yosemite National Park. For over ten years the franchise fees have bilked the taxpayer. The Concessionaire has been described as operating a "cash cow". The MCA/Curry Company has stated on numerous occasions the cost of implementing the 1980 General Management Plan precluded renegotiation of the fees.

Now more than ten years later a Concession Service Plan is placed before the public without any mention of timetables, deadlines and enforcement of the concessioner's responsibilities for how these general management plan requirements will be achieved. There are no time lines, there are no penalties for failure to comply with contract requirements, there are no time periods set for fee renegotiation, nor any assurances to the public that this wish list of activities will be accomplished.

2537 15th Street • San Francisco, California 94114 • (415) 863-6307 • Fax: (415) 552-4369

Letter 34

COMMENTS

RESPONSES

March 3, 1976, a Joint Report by the Committee on government Operations and the Committee on Small Business found that the National Park Service Policies Discourage Competition and Give Concessionaires Too Great a Voice in Concession Management. In 1990 the Inspector General reported to Congress that the National Park Service from 1984 through 1988 lost \$83 million by failing to increase fees and that there still wasn't competitive bidding. This concession services plan does not delineate how the National Park Service plans to set fees and how they plan on ensuring competitive bidding.

Another issue raised by the Inspector General in their 1990 audit was money lost due to the failure on the part of the National Park Service to renew contracts in a timely basis so new fees could be assessed immediately upon contract expiration. The National Park Service by injecting a major revision of the General Management Plan ensures public controversy and delay. Once again the public will lose valuable funds that should be collected from the concessioner.

This contract services plan not only violates the GMP it discourages competition and increases the commercialization Yosemite. The construction of 155 motel units and 144 cabins in Yosemite Valley along with riding stables and enclosing eating areas clearly will once again establish possessory interests within Yosemite Valley. Replacing temporary buildings with these permanent structures skews the bidding process and ensures future contracts will not be open to competitive bidding.

Perhaps the most egregious failing of this document is wholesale disregard for the 1980 General Management Plan. The GMP process was borne out of the 1976 Congressional Oversight Hearings that demanded greater public participation. Thousands of people participated in that planning process. In 1989 the National Park Service tried to build these 155 motel units at Yosemite Lodge and the 144 cabins in Curry Village. The public once again overwhelmingly, 54.3%, stated they supported implementation of the 1980 GMP.

34a

Today the National Park Service puts forth a Supplemental Environmental Impact Statement that demands the public assess 7-9 other documents, many of which are not completed or in draft form, and weigh design changes that are not provided, before the public can fully understand the implications of these General Plan Amendments. Keep in mind these changes are not called General Plan Amendments, but rather, a Concession Services Plan. This borders somewhere between outright deception and lying to the American people.

34b

34c

The National Environmental Policy Act does not contemplate the use of a supplemental EIS to change a major federal action that took place ten years ago. The 1980 GMP and associated environmental impact documents are final. The general management plan process requires the Park Service to adopt a Concession Services Plan to implement the GMP.

34a See response 24b.

34b The title page and summary of the draft supplemental EIS states that the plan includes amendments to parts of the 1980 GMP that deal with concession services action items.

34c The Council on Environmental Quality's regulations for implementing NEPA (36 CFR 1502.9 (c)) state that an agency shall prepare supplements to a final environmental impact statement if the agency makes substantial changes in the proposed action that are relevant to environmental concerns. The process required for a supplemental environmental impact is essentially the same as the process required for all EISs. The major difference is that a supplemental EIS is usually more narrowly focused in scope than a normal EIS. In addition, you can refer to question 32 and its answer in the "Memorandum: Questions and Answers about the NEPA Regulations," issued by the Council on Environmental Quality on March 17, 1982, for further clarification regarding supplemental EISs.

COMMENTS

RESPONSES

The plan calls for a reduction of commercialization and reclaiming Yosemite Valley's priceless natural beauty. **The Plan specifically states:**

o "Space in the Valley will not be allocated for resort activities since they are not directly related to the significant resources." (pg. 15) and

o "Activities such as picnicking, hiking and camping which take advantage of the park's natural features rather than man made facilities or mechanized equipment, are the most appropriate uses of the park." (pg. 15) The plan continues;

o "A full range of overnight accommodations will continue to be provided; however, no attempt will be made to meet all demands for accommodations inside the park because it would require an unacceptable level of development." (pg 19)

34d

The new proposed plan amendments stress increased hotel development, encaged eating areas, and more fast food eating establishments. These constitute a major federal action and therefore demand a full environmental impact statement. All of these actions are stated to have no significant environmental impact and yet no data is provided to support these conclusions.

34e

NEPA requires an objective analysis of alternatives and impacts. Much of this document borders on out right deception. For example, there is no assessment of how much land will be disturbed, the impacts on air quality from increased development, nor the impacts to National Wild and Scenic Rivers. The document states "without preliminary designs, accurate quantification of the effects on vegetation from these actions is not possible." And yet conclusions are drawn that there are no significant impacts.

34f

Furthermore, figures and percentages are presented so as to camouflage the changes from the GMP. For example, figures and percentages provided are not differences from the plan, but rather from use figures for 1980. Conclusions that these permanent development plans to construct 155 motel units and 144 cabin units plus stables in Yosemite Valley will not result in significant environmental impacts are not supported by data. Comparing these permanent structures to existing nonpermanent structures, that under the plan are suppose to be removed, deceives the reader into minimizing the environmental impact associated with such development.

34g

The document mentions that hazardous soil contamination at both the Curry Company Garage and Dump might impact the Merced Wild and Scenic River. Clearly there is no reason to delay the clean up of these hazards. Especially given clean up is the responsibility of the existing concessioner.

34d

The fact that the *Concession Services Plan* is accompanied by a supplemental EIS acknowledges that there could be environmental impacts. The conclusions in the supplemental EIS are based on available data. Additional environmental compliance will accompany site-specific development concept plans. Also see response 18f.

34e

The draft supplemental EIS does not attempt to deceive the public or other groups or agencies regarding the impacts of the proposal. The document describes the impacts that are known in as much detail as the available data permit. Estimates of disturbance to vegetation are provided, as well as all other impacts that are anticipated from implementation of the proposal.

34f

Figures and percentages presented in the document are accompanied by information stating what is being compared and do not camouflage changes from the 1980 GMP. Furthermore, alternative A is the 1980 GMP proposal, so that some comparison with 1980 conditions is warranted. Table 2 compares the alternatives to the existing situation. Table 3 compares the alternatives to both existing and 1980 conditions. Table 6 compares the impacts of the alternatives to the existing situation.

Known impacts are stated. Additional impact analysis will accompany site-specific design proposals in the development concept plans.

34g

The National Park Service will ensure that any contamination or toxic substances present at the dump will be cleaned up in compliance with all applicable federal, state, and county standards. Also see responses 5a and 24u.

COMMENTS

RESPONSES

34h During the 1970 Congressional Hearings, MCA attempts to reduce the lower cost nonpermanent accommodations and replace these with more upscale units was resoundingly attacked. In 1980 thousands of citizens supported moving permanent development out of Yosemite Valley. The proposed revisions are a major departure from the 1980 GMP. The public comment in 1989 again supported implementation of the GMP. These changes skew usage toward people who can afford \$70 per night rooms. The impacts to families, lower income people and those seeking a less commercial lodging experience need to be documented. Further there are numerous cumulative impacts from noise to increased services that must be addressed. NEPA requires these changes be identified and evaluated.

34j No where in the document can the reader clearly understand and evaluate the environmental impacts from the following changes made in the 1980 GMP:

34k 1. No assurances that nonessential employee housing will be removed from the Valley. Most likely the increase in permanent development will provide yet another rationale for why these employees need to be housed in the Valley.

34l 2. No timetable nor assurances the concessioner's headquarters, convention planning, marketing and wedding reception functions will be removed from the Valley.

34m 3. A substantial increase in year round permanent facilities with baths is being proposed. The attendant noise, sewage disposal, supply services, air impacts, vegetation impacts and wildlife impacts have not been provided. The cumulative effects analysis is woefully inadequate supplying only unsubstantiated conclusions.

34n 4. Failure to remove commercial establishments such as clothing and sporting equipment sales, as well as, conversion of the public lounge to the Mountain Bar with a big screen television.

34o 5. Failure to complete the required transportation studies.

6. Failure to provide a timetable and location for the removal of nonessential employee housing and services from the Valley.

The stated intention is to amend the GMP. Thus, the public has a right to consider change to this plan all at once instead of in a piecemeal fashion spread out over numerous documents.

34p Finally, the document does not fully assess for the public the fact that the GMP policy to 'redirect development to the periphery of the park and beyond' is being disregarded. The document fails to carry out the Park Service's foremost responsibility, "to perpetuate the natural splendor of Yosemite and its exceedingly special Valley."

Sincerely,


Patricia Schifferle
Director

34h See response 9b.

34i The National Park Service does not consider noise impacts from the proposed action to be significant. The cumulative impacts of the 1980 GMP (alternative A) and the proposal were stated in the draft document. Also see all responses to letters 7 and 8.

34j See responses 2b and 16a.

34k See responses 1a, 1b, 3j, and 16a.

34l See all responses to letter 7, and see response 8c.

34m The draft proposal called for a reduction in clothing and sporting goods outlets in the park. In response to public comment, the final proposal includes restoration of the Yosemite Lodge lounge to its original location in the existing Mountain Room Bar. The lounge would be used as a waiting area for diners not wishing to wait in the bar, as well as for lodge guests at all times.

34n See response 2b.

34o See response 16a.

34p See response 1a.



**Peninsula Conservation
Center Foundation**
2448 Watson Court
Palo Alto, California 94303
(415) 494-9301

BOARD OF DIRECTORS

Abbey Bhushan
Ann Briggs
Geoff Brosseau
Jeff Brown
Owen Bird
Eric Goetz
Sylvia Gregory
Deborah Jamison
John Joyn
Barbara Khellia
Dana Kohn
Betty Meltzer
Laura Mueller
Tricia O'Hara
Ragini Pasareel
Marlene Prendergast
Paula Sanders
Susan Schaps
Rob Sheldon
Kathy Torgersen

ADVISORY COMMITTEE

Jim Baer
Bob Brown
Tory Carrasco
James Compton
Toby Cooper
Edith Dorson
Jerry Elkind
Ariemas Ginzton
Christy Holloway
Joseph Houghsiding
Mel Lane
Karen Nilsson
John Northwey
Mary Paine
End Pearson
Lennie Roberts
Paul Rasmick
Frank Schiavo
Marge Sutton
Jay Thorwaldson
Terry Trumbull
Cole Wilbur

February 4, 1992

Michael Finley
Superintendent
Yosemite National Park
P.O. BOX 577
Yosemite National Park, California 95389

Dear Superintendent Finley,

The Peninsula Conservation Center Foundation is a 1300-member citizen's group interested in environmental education and issues. Our members were among the 66,000 citizens who participated in 1980 in drafting the General Management Plan (GMP). We have reviewed the Yosemite National Park Concession Services Plan and Environmental Impact Statement, and we offer the following comments:

We feel the Concession Plan focuses too much on concession profitability and not enough on the possible consequences to the resource. For example, the plan approves of adding new buildings, but it does not describe them, and so skirts their environmental impact as unknown. We feel an Environmental Impact Statement should address the effects of known developments.

Similarly, the Plan defers decisions about where employee housing should be, when it is already likely that it will be located within the park boundary. The relationship between concession services and housing for concession personnel is another environmental impact that is deferred to some future and unspecified process. We feel it should be discussed in this Concession Plan.

The Plan reduces the overall number of overnight accommodations, a measure we applaud in the abstract. But it also increases food service, a change that implies increased day use that is discussed nowhere in the Concession Plan.

The Plan clearly seeks to compensate the concessioner for the loss of overnight rooms by substituting moderate-cost rooms for low-cost rooms. We feel this change will reduce the access that lower income visitors now enjoy at the park. Moreover, we feel the low-cost units are more in keeping with the history and spirit of the park.

We are concerned also about the addition of 41 rooms and a coffee shop at Wawona. Since the 1980 General Management

Letter 35

35a To the maximum extent possible, buildings would be constructed on previously disturbed sites in developed areas. General impacts that are known at this time are considered in the plan, which contains sufficient information and analysis to make informed decisions on the potential effects of various levels of concession services within Yosemite. Additional impact analysis will accompany site-specific design proposals in the development concept plans.

35b See response 18a.

35c See responses 3d and 3g.

35d See response 9b.

35e In the final proposal, the number of rooms at the Wawona Hotel would not be expanded and an additional food service facility would not be built at the hotel. However, the final proposal includes an additional restaurant elsewhere in the Wawona area to accommodate campers and other visitors. For impacts on the Merced River, see 7g and 7h.

35a

35b

35c

35d

35e

COMMENTS

RESPONSES

Letter to Michael Finley from Peninsula Conservation Center
February 4, 1992, page 2


Plan called for these additional units, the large Marriott Hotel opened a few miles away, outside the park. The only reason we can see for additional rooms at Wawona is to improve the concessioner's balance sheet.

We are concerned, too, about the effects of these additional facilities on the South Fork of the Merced River, the water supply for Wawona. Since the 1980 GMP was approved, the South Fork has been included in the National Wild and Scenic Rivers system. The South Fork already has low oxygen levels during dry periods. The additional drain on the South Fork by new facilities could have adverse consequences downstream. We feel it is premature to commit to additional concession facilities at Wawona before the Merced River Management Plan addresses this problem.

Finally, the Concession Plan presents no timetable for completion of the intended changes. The Plan estimate the cost to the concessioner at \$ 77 to 105 million, but points out that the concessioner can be expected to have only \$ 75 million available over the next fifteen years. The gap between cost and resources suggests that the National Park Service has no idea when the changes will be completed, and is not seriously committed to everything in the 1980 GMP or in the proposed Concession Services Plan.

As participants in the 1980 planning process, we believe the 1980 GMP set the right direction for Yosemite National Park. If the intent of the National Park Service is to change that plan, we feel a broader, more candid process, with wide public participation, is called for once again.

Sincerely,



Debbie Mytels
Executive Director

35f See responses 1b and 18b.

35f



PLANNING AND CONSERVATION LEAGUE

January 26, 1992

Superintendent Michael Finley
National Park Service
Yosemite National Park
PO 577
Yosemite, CA 95389

Dear Mr. Finley:

The following are the comments of the Planning and Conservation League regarding the draft Concession Services Plan for Yosemite. The Planning and Conservation League represents more than 150 local, state and national conservation groups in Sacramento.

1) Get the concession headquarters and lodging out of the park. The Park is for the public, not for concession management and employees.

2) Implement the General Management Plan. There is no reason for further delay other than giving in to demands of the concessioner.

3) Eliminate the commercial aspects of the park. People can buy clothes and trinkets elsewhere. Limit sales to items that a park user might need to buy to enhance the use of the park, such as equipment which can be used inside the park.

4) Lets finally get the cars out of the Valley.
Make public transit the cornerstone of the concessioner
and General Plan.

5) Staying in Yosemite should be cheap enough for the average person to enjoy. Don't let it get too expensive.

sincerely,

Gerald H. Meral
Executive Director

926 J Street, Room 612, Sacramento, CA 95814 916-444-8726 FAX 916-448-1789

Letter 36

36a See response 16a.

36b See response 1b.

36c The final proposal includes actions to reduce the amount of commercial activity in the park and provide quality park- and region-oriented souvenirs, as well as other merchandise that park visitors might need. Nonsouvenir clothing items would be limited to items necessary because of unanticipated weather, unanticipated activities, or loss of clothing. Extensive clothing lines would not be necessary or appropriate. One clothing outlet would be sufficient for such sales. A small sales area would be available at each of the lodging and camping stores to offer emergency clothing items and such accessories as hats and rain gear.

36d See response 2b.

36e See response 9b.

[illegible]

COMMENTS

RESPONSES

SERVICE EMPLOYEES

INTERNATIONAL UNION, AFL-CIO, CLC

1313 L STREET N.W. • WASHINGTON, D.C. 20005 • (202) 898-3200



JOHN J. SWEENEY
INTERNATIONAL PRESIDENT

RICHARD W. CORDTZ
INTERNATIONAL SECRETARY-TREASURER

February 27, 1992


Michael Finley
Superintendent
Yosemite National Park
P.O. Box 577
Yosemite National Park, California 95389

Re: Comments on the Draft Concession Services
Plan/Supplemental Environmental Impact
Statement for Yosemite National Park;
FR Doc. 91-31002

Dear Superintendent Finley:

Enclosed within, please find the comments of the Service Employees International Union regarding the National Park Service's draft concession services plan/supplemental environmental impact statement for Yosemite National Park. If you have any questions concerning the comments herein submitted, please contact Paul Hughes at (202) 898-3337.

Sincerely,


John J. Sweeney
International President

JJS\pjh
opelu#2
afl-cio, clc.

Enclosure

Letter 37

Comments of the
Service Employees International Union, AFL-CIO, CLC
On the National Park Service's
Supplemental Environmental Impact Statement for the
Draft Concessions Services Plan for
Yosemite National Park
Docket Number : 91-31002

Introduction

The National Park Service (N.P.S.) published its draft concession services plan / supplemental environmental impact statement to the Final General Management Plan for Yosemite National Park on December 17, 1991.

S.E.I.U. Local 752, represents the more than 1,000 service workers employed by the Yosemite Park & Curry Company - the National Park Service's concession contractor at Yosemite National Park. The Service Employees International Union (S.E.I.U.) represents over 975,000 workers in both the United States and Canada, including 250,000 workers in California. These members work in a variety of occupations and industries such as health care, building services, federal, state and local governments, and recreation.

Yosemite National Park provides seasonal and full time employment - total Curry Company employment fluctuates from 750 to 1,400 workers during the year. Many of the Curry Company employees work odd shifts, some of which last 24 hours a day. The average age of the Yosemite Park and Curry Company worker falls between the ages of 30 to 35. Well over 50 percent of the company employees have 5 to 10 years of seniority service, and a large group of employees have worked in the Park for over 10 years. The majority of Yosemite workers live in housing provided by their employer and located within the Park's boundaries.

1. The N.P.S. Must Evaluate the Impact of the General Management Plan on the Yosemite Park Workforce.

The S.E.I.U. requests that the National Park Service, N.P.S., address the concerns of the nearly 1,400 union workers. S.E.I.U. believes that the N.P.S. should view the environmental influences upon the Yosemite National Park from a regional, holistic perspective. The people who live in the Park, Curry Company employees, see the results of regional influences on the Park's

COMMENTS

RESPONSES

- 2
- natural resources every day. A holistic view of Yosemite's ecology will inform a reasonable balance between the Park's natural resources and the citizens who enjoy them.
- 37a The 1980 General Management Plan's calling for "removal of all automobiles from Yosemite Valley and Mariposa Grove and to redirect development to the periphery of the park and beyond" will have a significant impact on where concessioner employees live and work. If the Park Service moves employee housing outside the park, many workers could not afford a car - the only way to commute to work.
- 37b The requirements for a Yosemite National Park concessioner should include the maintenance of benefits for concessioner employees, and the right of first refusal for employment. A workers' well being influences the quality of service provided to Park visitors.
- 37c As it plans for the future, the N.P.S. must ensure a viable community infrastructure, including basic social services, for the more than 1,000 workers who cater to the hundreds of thousands of people who visit the Park each year.
2. Proposed Service Changes Will Produce No Clear Environmental Benefit.
- The draft concession services plan presents two alternatives for the public to examine: alternative A, derived from the G.M.P.; and alternative B, a modification to the G.M.P. Alternative B reduces overnight (particularly economy) lodging while concurrently increasing the number of fast food & restaurant seats. Currently, a wide-ranging recycling program has the full participation of the workers within the park. The N.P.S. wants to preserve the park's natural resources, yet increased day-visitor use will destroy the efforts both the concessioner and the workers have made to preserve the environment.
- 37d
3. The N.P.S. Should Evaluate the Impact of Stimulating Development on the Park's Boundaries.
- Any actions the N.P.S. will take to ensure the preservation of Yosemite National Park's natural resources should be shaped by the knowledge that our environment is an interdependent system which coexists in which wildlife coexists with human beings.
- 37e The man-made development surrounding Yosemite National Park has an preponderant influence upon the continued vitality of the Park's water, air and wildlife. Currently, the area of El Portal, a town just east of the Park's popular Valley entrance, is struggling to maintain an efficient sewage system and to protect the area water shed. The N.P.S. should study how both an increase

- 37a The draft *Yosemite Valley Housing Plan/Supplemental EIS* will address the impacts on employees of alternative housing locations and transportation requirements.
- 37b Employment issues are operational and contractual. They will be considered in the park's concession management program.
- 37c Community infrastructure will be addressed in the draft *Yosemite Valley Housing Plan/Supplemental EIS*.
- 37d The *Concession Services Plan* does not contain any proposal to increase the day-use visitor use limits set in the 1980 GMP.
- 37e The National Park Service operates the El Portal sewage system in compliance with all applicable standards and regulations.

COMMENTS

RESPONSES

3

37f

in overnight lodging development on the park's boundaries and further movement of concessioner employee housing influences the Park's surrounding ecosystem.

37g

Reducing overnight housing for visitors encourages greater car and bus transportation, and thus greater air pollution. Increased pollution will threaten visibility within the park. Viewing American treasures such as the Domeback must be preserved. In addition, visitors will seek out overnight lodging close to the park in greater numbers. Greater development outside the park merely puts greater strain upon the both the regional water supply, and air and water quality.

4. The N.P.S. Has Not Adequately Evaluated the Socioeconomic Impact That Altering Services Will Have Upon Gateway Communities.

37h

The N.P.S. has stated a preference for the Draft Concession Services Plan Option B. Option B reduces overnight visitors lodging within the park's boundaries and supports unspecified movements for employee housing, while projecting several miscellaneous construction projects within the park. Reducing overnight visitor lodging will encourage hotel and lodging development directly outside the park.

37i

An increase in the supply of services extending out from the eastern corridor of the Park would drive up costs for consumers in the area. The counties surrounding Yosemite will need infrastructure investments and funding for emergency medical and social service programs. Mariposa County is one of the poorest counties in California and would have difficulty funding the amount of infrastructure expansion required for new services and housing. The Park Service needs to undertake a careful and thorough study of the economic and social impacts of the draft plan on surrounding communities.

37j

5. Housing Changes Will Burden Yosemite Park Workers With No Clear Environmental Benefit.

The Draft Environmental Impact Statement has not addressed the pressing housing issues that S.E.I.U. raises. These unspecified housing changes will impact the level of services provided within the park. The members of S.E.I.U. Local 752 worry that the housing relocation plan, as prescribed in the 1980 General Management Plan, will be unduly burdensome on the Park's workers and will not have the desired beneficial effects on the Park's natural resources.

Important environmental questions include the following:

How will the proposed housing changes affect the Park's

37f

See response 13b. The draft *Yosemite Valley Housing Plan/Supplemental EIS* will address impacts of moving employee housing on the surrounding ecosystem.

37g

See responses 2b, 7c, 7d, 7e, and 7h.

37h

The draft *Yosemite Valley Housing Plan/Supplemental EIS* will address employee housing. It is NPS policy to encourage private enterprise outside the park, and this is in keeping with the goals of the 1980 GMP.

37i

See response 13b.

37j

The draft *Yosemite Valley Housing Plan/Supplemental EIS* will address employee housing issues and the associated environmental impacts of alternative proposals.

COMMENTS

RESPONSES

4

transportation infrastructure (ie., paved roads, bridges etc.) ?

How will the Park mandate the employees' transportation options (ie; where are cars allowed within the Park, etc.) ?

How will employees get to their jobs; will the Park implement a new shuttle bus system ?

Would the relocation of housing just beyond the Park spur development which could negatively impact the nearby Yosemite Valley (compared to environmentally neutral alternatives within the Park) ?

Furthermore, the S.E.I.U. urges the N.P.S. to consider employee morale and need to maintain the social infrastructure. Because of the Park's geographic isolation, the N.P.S. must make adequate provision for continuing the community services currently available to the Park's workforce. Upgrading housing standards must remain a minimum goal.

6. The Draft Concession Services Plan/Supplemental Environmental Impact Statement Does Not Provide Transportation Alternatives Which Address Economic Or Environmental Concerns.

A critical examination of the level of services within the park must review adequate service levels and safe transportation for visitors and workers alike. Travel along Route 140 to Mariposa from the Park's eastern periphery cannot support further increases in traffic volume or weight. Workers who provide the services within the park do not work rigid day-shifts, but work a myriad of shifts that preclude wholesale scheduling of employee busing from outside the park's boundaries.

* How would an increase in shuttle buses (for either visitors or workers) affect the Park's air quality ?

7. The Draft Concession Service Plan Does Not Specify Costs To The Concessioner.

The service changes proposed by the N.P.S. will require significant new construction by the concessioner, an estimated \$47 million to \$64,500,000 for employee housing ... (and) \$30,500,000 for other construction called for in alternative A, and \$41 million for alternative B" (page x, draft plan). For any new concessioner, the widely varying estimated construction costs will be in addition to the \$49 million cost of acquiring the stock of the current concessioner. It is unrealistic to assume that the concessioner can recover the capital investment and return profits from revenues generated in the park.

37k See response 2b.

37l See responses 1b and 24a.

37k

37l

COMMENTS

RESPONSES

5

8. The N.P.S. Must Preserve Public Access to America's Premier National Park.

Some have proposed that Yosemite's status as a National Park should be revoked and the land converted to a refuge or preserve where human intrusion is severely limited. S.E.I.U. believes that the N.P.S. should maintain Yosemite's status as our nation's premier National Park. Our nation's premier National Park should provide a variety of recreational activities and accompanying services to accommodate various levels of visitor needs.

Tourism has reached an international all-time high and Yosemite Park is an important destination for visitors from across the United States and countries around the world. To reduce operations on the Valley Floor might suit the goals of those seeking to restrict the public's access to the Park. However, further reductions in the few restaurants and lodging alternatives would, in practice, bar visitors from enjoying the Park and should not be implemented. The N.P.S. should continue to provide the American taxpayer an affordable, convenient vacation opportunity in a Park full of protected resources.

The draft plan ignores other types of environmentally neutral services that could be provided for visitors as part of the concessions contract. The N.P.S. should give consideration to finding ways to modify existing services to reduce their environmental impact as an alternative to a wholesale reduction in visitor services.

9. The N.P.S. Should Cooperate with the Concessioner and Park Workers to Reduce the Environmental Impact of Park Services.

Any further environmental controls which aim to preserve the environment should rely upon input of the workers who reside in the Park and participate in conservation efforts on a 24-hour basis, 365 days out of the year. The N.P.S. should cooperate with the concessioner and the workers who are most familiar with the Park's natural resources. The Curry Company has already undertaken activities to reduce the impact of concessions services' on the environment. For example, the Yosemite Park & Curry Company diverts a percentage of all revenues generated by lodgings and food consumed in Company restaurants to support the recycling program within the Park. However, the N.P.S. has failed to take into account the Curry Company's existing conservation efforts in its environmental impact analysis.

The N.P.S. should not simplistically assume that concessioner-managed activities and services are inherently destructive to the Park's resources or that recreational activities not managed by the concessioner are inherently benign from an environmental standpoint. The concessioner and its employees have an important

37m

The National Park Service does cooperate with the concessioner and recognizes the contributions of the concessioner and its workers to interpretive services and the park recycling program. The new concessioner will also be expected to participate in these efforts.

COMMENTS

RESPONSES

6

role to play in preserving Park resources.

Conclusion

The Service Employees International Union believes that the N.P.S. should continue to provide the American taxpayer an affordable, convenient vacation opportunity in a Park full of protected resources and ecologically balanced services.

COMMENTS

RESPONSES



SIERRA CLUB 730 Polk Street San Francisco, California 94109 415-776-2211

February 18, 1992

Michael V. Finley
Superintendent
Yosemite National Park
P.O. Box 577
Yosemite National Park, CA 95389

Dear Superintendent Finley:

Please accept the following statement as my comments on the Concession Services Plan, Environmental Impact Statement for Yosemite National Park, dated December, 1991:

To celebrate its 75th anniversary the National Park Service held a working Congress on national park management at Vail, Colorado, in October 1991. At that Congress, the Secretary of the Interior, Manuel Lujan, stated that "the mission of the National Park Service is, first, to protect the resource, and second, to provide for enjoyment by the public. But when push comes to shove, we've got to protect the resource."

The draft report of the working group of the Congress on park use and enjoyment recommended that the Park Service minimize the development of visitor facilities within park boundaries and permit such development only to the extent required to meet visitor needs.

The following steps were suggested to implement this recommendation:

1. "Convenience and profit should be legitimate concerns in the development of park facilities, but they are not sufficient rationale for providing services and facilities within parks. The standard of necessity should be flexibly applied in each park through revision of the current planning process, and the determination of need should include significant public involvement."
2. "The National Park Service should use existing authority to remove, whenever possible, unnecessary facilities."
3. "In all instances, the protection of each park's unique values should be the determining factor in development decisions."

All of the above phrases express fine and noble sentiments.

The 1980 Yosemite General Management Plan was an attempt to carry out these recommendations many years before the Parks Symposium took place.

To explore, enjoy, and protect the wild places of the earth...

Letter 38

COMMENTS

RESPONSES

So why should the 1992 preferred alternative of the Draft Concessions Service Plan for Yosemite National Park reverse what, presumably, is National Park Service policy and instead continue a trend to consider Yosemite as a destination resort offering a broad sweep of featured amenities to attract the visitor? Rather, Yosemite should be treated as the grand unique natural feature of the planet that it really is.

The draft Concessions Services Plan is called an Environmental Impact Statement, a draft supplement to the Final Impact Statement for the 1980 GMP. In reality, it negates the effect of the GMP in several ways. Specifically:

38a

1. The concession activities and profit centers added since the 1980 Plan and not specifically authorized by that plan are not terminated by the draft CSP. They should be.

38b

2. The environmental impact analysis for Alternative B, the preferred alternative, is inadequate. The section on Impacts on the Natural Environment gives numerous instances of information insufficient to determine how the natural environment will be affected. No information is given on the impact of the proposed new roads and parking lots mentioned in this section--as necessary for the proposed new lodging and other developments. While there is an overall reduction in lodging proposed slightly greater than that required by the GMP, the CSP fails to justify construction on 155 entirely new motel units and 50 new cabins at Yosemite Lodge.

38c

3. This proposed new construction goes directly counter to the spirit of the 1980 GMP. It would contribute toward conversion of the park into a year-round tourist center -- which it should not be. Accomplishing a reduction in total accommodations in the CSP by greatly diminishing the number of low-cost accommodations available and increasing the high-cost accommodations fundamentally changes the mix of available lodging and discriminates against low-income visitors.

38d

4. Transportation, employee housing and resource management issues are central to planning for concessioner services and should be discussed in the CSP, not deferred to future and separate documents. Transportation needs, especially, will be directly affected by the concessioner services provided. The CSP fails to require the concessioner to contribute to the gradual removal of private automobiles from the valley. Funding for necessary transportation improvements should be sought at once. Employee housing would be better served at El Portal than at Foresta, where no infrastructure exists and where a major impact on the natural resources would result. And the search for private financing can begin at once, if the move to El Portal is made firm; continued delay hinders a solution.

38e

5. The policy on food service should not be based on accommodating

38a

Past changes in concession services have been primarily operational adjustments such as Wawona Hotel evening barbecues, increased bicycle rentals, raft rentals, use of vending machines, and moonlight tram tours. It should be noted that not all operational adjustments require public review and approval. Changes or amendments to an approved plan are allowed when such changes would cause no environmental impact or only minimal environmental impact (516DM6, App.7.4(B)(1)).

38b

See response 18f.

38c

Yosemite Lodge was designated a year-round facility in the GMP; Curry Village has always had additional inexpensive rooms available in the winter; and the Wawona Hotel is open during all seasons. The final proposal calls for a lower number of rooms, but more would be available for year-round use. Under this plan there would be fewer rooms available at Yosemite Lodge in winter than at present, and more at Curry Village. In terms of winter visitor densities, it should be noted that half the overnight visitors to the valley are campers and that very little camping is done in winter. Also see response 9b.

38d

See response 18a.

38e

See response 3d.

COMMENTS

RESPONSES

38f

uncontrolled, overcrowded visitation. If day use is the chief problem, as the NPS states, then NPS should address that problem, rather than going along with it. Day-use tours can be limited. The National Park Service is not obliged to feed unlimited sit-down meals to endless streams of visitors. The carrying capacity of Yosemite Valley, in terms of a quality experience for visitors and the impact on natural resources, should be the deciding factor.

6. The CSP fails to provide any time table or funding mechanism for GMP action items required of the Concessioner. Twelve years have now passed since the GMP was issued. The NPS has pointed out only that it did not have the funds to carry out the GMP; now it has the unique opportunity to require the concessioner to be involved in funding the GMP implementation. It should seize that opportunity. The draft CSP does not.

7. To sustain a high quality of visitor experience, the National Park Service must achieve an appropriate balance between an ascending amount of visitor use on its finite resources and the implementation of a policy on carrying capacity for those resources. Nationwide, the park superintendents of the Service, in their 1980 State of the Parks, reported that visitor use was the major resource-threatening problem emanating from inside park boundaries. Yosemite is a prime example of this. It can become a model for the rationale, techniques, and results of achieving a sustainable high-quality park experience by balancing these two forces. This objective is at the heart of the Organic Act of 1916 for the National Park Service, reinforced in law by 1978.

38g

All directions to the prospective concessioners for Yosemite National Park should include the necessity of abiding by the carrying capacity of the park, and particularly of Yosemite Valley. The concessioners should include in their plans proposals for limiting the number of people using their facilities.

Thank you for the opportunity to comment on the Concession Services Plan for Yosemite National Park.

Sincerely,

Edgar C. Wayburn

Edgar Wayburn, M.D.
Vice President

38f

See responses 1b and 18b.

38g

The National Park Service will ensure that the concessioner does not exceed the capacities stated in the GMP.

COMMENTS

RESPONSES

SIERRA
CLUB



730 Polk Street San Francisco, CA 94109 415-776-2211 Fax 415-776-0350

February 10, 1992

Superintendent Michael V. Finley
Yosemite National Park
P.O. Box 577
Yosemite, California 95389

Re: **Yosemite Draft Concession Services Plan**

Dear Superintendent Finley:

Sierra Club thanks you for the opportunity to review the draft CSP and offers the following comments:

I. GENERAL COMMENTS

1. **Introduction.** We have reviewed the government's draft Concession Services Plan for Yosemite National Park. We believe that the preferred alternative, if adopted as policy, would result in more overcrowding and commercial development, causing more damage to park resources and interference with the visitor's inspirational Yosemite experience. The CSP will define concessions policy in Yosemite for the next 15 years, but it fails to call for the full implementation of a single major action item in the visionary 1980 General Management Plan (GMP). The GMP was itself a compromise between resource protection and commercial development; as such it represents the minimum acceptable standard for management and concessions policy in the park. As the CSP fails to substantially implement the concessioner-related action items in the GMP, it is inadequate as a planning document for Yosemite National Park. The CSP amounts to a subversion of the GMP.

Sierra Club is very concerned that the CSP in general and the NPS preferred alternative in particular evidence a management philosophy that views the expansion of commercial activity in Yosemite as inevitable and desirable,

Letter 39

COMMENTS

Michael V. Finley
Page 2

despite decades of public comment and legislation to the contrary. NPS has publicly described its task in this planning process as achieving a "balance" between preservation and use. We urge you to review applicable federal statutes, beginning with the Organic Act. They make clear that NPS's primary duty is to preserve the park's resources. There is no provision for a "balancing" of interests.

2. An additional draft CSP should be prepared and additional public comment solicited. The CSP needs to be completely redrafted so as to provide for implementation by the year 2000 of all concessioner-related action items in the GMP, and another draft issued for public comment. Complete redrafting is necessary because the plan's single other alternative does not fully implement all concessioner-related GMP action items and because several major issues (see below) are not discussed. We recommend a second draft be published within ninety (90) days from the termination of the present public comment period. An additional public comment period, with public hearings expanded to include Washington, D.C., should be scheduled.

We urge NPS to recognize the overwhelming public opposition to the draft CSP, as expressed at the recent public meetings and in written comments to date, and write an entirely new plan in accordance with the 1980 GMP.

3. Public participation was discouraged by NPS during development of the CSP. It is well established that the best planning for Yosemite has always occurred when the greatest number of people have been involved. Unfortunately, from the inception of the current concession services planning process NPS has intentionally discouraged public participation. The initial scoping letter was distributed to approximately only 55 non-governmental recipients, and no news media beyond a 70-mile radius from the Park were provided with the information. In fact, NPS failed to provide the scoping letter to all the individuals and groups who had previously written to NPS requesting to be notified. The unacceptably short period for public comment on the scoping letter was extended only after vigorous protests from the environmental community.

NPS initially refused to provide a public forum for comment on the draft plan, insisting that written comments would suffice. We are not convinced that written comments are duly considered, given park management's stated policy of placing letters urging implementation of the GMP into a box marked

39a

We disagree with the comment and find several inaccuracies in the examples given. Ample coverage and arrangements were made in full compliance with the requirements of NEPA regulations.

The National Park Service issued a *Federal Register* notice of intent on July 1, 1991, which explained that the supplemental EIS would focus on concession action items and that the Park Service intended to conduct scoping. The announcement was further augmented by a letter from the park superintendent dated July 8, 1991, that was sent to 85 organizations and individuals. The Western Regional Office of the National Park Service contacted the following newspapers on June 28, 1991, and informed them of the upcoming scoping process: *Fresno Bee*, *Sacramento Bee*, *San Francisco Chronicle*, and *San Francisco Examiner*. The scoping process extended until August 15, 1991.

Four public meetings were held on January 29, 30, 31, and February 1, 1992, in Los Angeles, Fresno, San Francisco, and Yosemite National Park. More than 1,075 people attended those meetings, and 231 spoke. Meetings were recorded and notes were taken on the oral comments. The notes were compiled and analyzed by the NPS planning team in attendance at the meetings.

In addition to oral comments, 4,057 written comments were received during the comment period; all letters and cards were read and reviewed for substantive comment.

COMMENTS

RESPONSES

Michael V. Finley
Page 3

"non-response." Public hearings on the CSP were urged by environmentalists and commentators, but NPS agreed only to hold public meetings with no official record. Those meetings, held in facilities that were too small, produced overwhelming support for the GMP and overwhelming opposition to the draft CSP. The public told NPS in no uncertain terms that it wants the GMP implemented immediately, and that new buildings and commercial activities not specifically authorized in the GMP are unacceptable. The public made it crystal clear that the draft CSP should be redrafted to implement the GMP.

Some of our members have experienced difficulty in obtaining a copy of the draft CSP in a timely fashion. NPS should consider extending the current public comment period.

4. The \$62 million Curry buyout is bad for Yosemite and should be renegotiated. It effectively requires a high level of commercial activity in order to pay the debt service on the note, decreasing the likelihood of real progress in implementing concession-related GMP action items. The \$49.5 million value assigned to Curry assets has never been justified to the public or to Congress. Sierra Club filed a Freedom of Information Act (FOIA) request for the accounting information upon which this price is based. The buy-out price was raised to \$62 million by adding \$12.5 million in interest that accrues prior to any transfer of ownership or possession. MCA continues to receive all the income generated by the Curry concession operations from the signing of the agreement until the transfer of the assets in 1993. What is the rationale for this apparent gift of public funds? The buy-out should be renegotiated to obtain terms favorable to Yosemite and to the public.

II. SPECIFIC COMMENTS

39b

1. All GMP concession-related action items must be included in the CSP. As drafted, the plan sets forth a vision of Yosemite's future completely contrary to the letter and spirit of the GMP. It picks and chooses among GMP action items, partially implementing some, ignoring others, and proposing new commercial development not authorized in the GMP. NPS' position that the GMP is "outdated" and "needs revision in some areas" is a conclusion reached with absolutely no planning or public involvement. The CSP should serve to implement the GMP, not amend it.

39b See responses 1a and 3c.

Michael V. Finley
Page 4

39c

2. Specific timetables and funding sources should be provided for accomplishment by the year 2000 of GMP action items required of the concessioner . These issues should not be deferred and considered only in the Statement of Requirements to be published at a later date. All concession-related action items should be implemented in full by the year 2000. The current NPS position that it does not want its plan to become "dated" suggests that implementation of reforms will never occur, as has been the case with the 1980 GMP. It sets the stage for another 15 years of management and concessions policies that favor high visitation levels and expanding commercial activity at the expense of resource protection and a visitor experience that emphasizes Yosemite's natural features.

Private funding sources should be used for housing and other facilities at El Portal.

39d

3. Transportation, employee housing, and resource management issues are central to concessions planning and should be discussed in the CSP and not deferred to future plans. Without discussion of these issues the CSP is largely meaningless.

Transportation. The CSP fails to require the concessioner to contribute to the removal of private automobiles, identified in the GMP as the largest single source of resource damage, from the Valley. The CSP only sketchily mentions expansion of the Valley shuttle bus system. It completely fails to address the problem of transportation to the park.

Funding for transportation should be allocated now. At present, transportation planning funds are available from: 1) the Yosemite portion of the \$240,000 appropriated this year for a study of transportation methods in three parks; 2) NPS should join with surrounding counties to apply to Governor Wilson for an allocation from the \$6 million California portion of the Federal Rural Transportation Funds for Regional Planning; 3) Director Ridenour should give a high priority allocation of the 1992 and 1993 \$70 million public lands portion of the Highway Act; 4) \$2 million per year provided by Matsushita.

NPS should issue a separate concessions contract for bus transportation to and from gateway communities as a means of eliminating private automobiles from Yosemite Valley.

39c See responses 1b and 18b.

39d See response 18a.

COMMENTS

RESPONSES

Michael V. Finley
Page 5

All parking lots and related activities (including valet parking under the trees at the Ahwahnee) not authorized in the GMP should be removed or terminated at once, with the areas restored to meadow.

Employee housing. Employee housing should be provided in El Portal, not Foresta. Foresta is an ecologically important area, as it is a classic Sierra forest/meadow habitat of the type which should be preserved within a national park. It is most scenic and is attractive to a variety of wildlife and bird species, including the great grey owl. Archaeological sites are common in the area.

In El Portal private funding sources could be utilized for construction of employee housing, but this would be impossible in Foresta, which is within the park. It has been estimated that use of private funds for this purpose could release \$25 million of concessioner housing investment funds for use in GMP implementation. This money would be lost if Foresta is the employee housing site.

Resource management. The impact of these issues on management of park resources should also be considered in the CSP.

4. Implement a day use reservation system to control overcrowding, damage to resources, congestion, and interference with the visitor's experience.

5. Establish appropriate day use levels. This will assist in planning for implementation of many key GMP action items.

6. Lodging. No new buildings of any kind are acceptable unless specifically authorized in the GMP. Yosemite is too valuable a resource to use for construction of buildings, parking lots, roads, and other utilities.

An overall lodging reduction slightly greater than required by the GMP does not justify building 155 new motel units at Yosemite Lodge and 144 new units at Curry Village. This proposal is directly contrary to GMP mandates to reduce the impact on Yosemite of development and commercialization.

Equally objectionable is that the 'reduction' is accomplished in the CSP by eliminating more low cost lodging than mandated in the GMP, thereby

39e See response 3g.

39f See responses 1a, 3c, and 9b.

39e

39f

COMMENTS

RESPONSES

Michael V. Finley
Page 6

39g

changing the mix of lodging available. The lodging section as drafted would not only cause more resource damage through construction and increased commercial activity, it would disadvantage the park visitor of more moderate means who feels their needs are adequately met by more rustic

accommodations which are more consistent with a national park. The concessioner's desire to fill all lodging on a year-round basis as a means of promoting its mid-week ski package and other services is inconsistent with resource protection and the GMP.

39h

Lodging changes at Wawona inconsistent with the GMP, such as replacing cabins without baths with cabins with baths, are unacceptable. The additional rooms in the GMP should now be unnecessary because of the increase in private rooms available at Fish Camp.

39i

Utilities at Vogelsang, one of the High Sierra camps, were recently expanded in violation of the GMP and the Wilderness Act. This unlawful activity cannot be condoned and must not be repeated at this or other backcountry locations, including Sunrise camp. The GMP specifies that if these facilities cannot be operated with existing utilities, they are to be closed and become part of the wilderness.

39j

7. Food service policy as expressed in the CSP is inconsistent with the GMP in several respects. First, the CSP assumes that the Park Service's duty is to continue to accommodate uncontrolled overcrowding rather than dealing with the underlying problem. NPS should institute a day use reservation system. Commercial bus tours, identified by park management as a prime source of increasing day use, should be properly regulated. Tour companies could be required to provide box lunches for their customers and also arrange for refuse recycling to avoid littering the park. These box lunches could be obtained from private merchants in gateway communities.

Second, the CSP assumes that every visitor must be fed in a concession-operated facility. This is not the case. Many people prefer to bring their own food and enjoy a picnic in a beautiful setting. Additional picnic tables could be provided in areas slated for restoration under the GMP, such as Curry Orchard and Degnan's. Picnic supplies could be purchased outside of the park or in a GMP-approved grocery store. Sierra Club's approach is consistent with the GMP's preference for activities that put the park visitor in closer contact

39g See response 3j.

39h See response 35e.

39i See response 28a.

39j At present, visitors bring in lunches, purchase picnic supplies at the Village Deli, or buy box lunches at the restaurants. Some bus tours bring in box lunches for their passengers. Much of the outdoor food service seating is used by all of these visitors. Seating areas at hardened sites are easier to maintain and have less impact on the resource; they would be expanded and their settings improved under the final proposal. Also see response 3d.

COMMENTS

RESPONSES

Michael V. Finley
Page 7

with Yosemite's natural wonders. Mitigation measures can easily be taken to prevent littering or other damage to resources.

Third, the CSP calls for retention and use for food service of structures slated for removal under the GMP, such as Degnan's and the patio at Curry Village (added since 1980 in violation of the GMP). NPS attempts to justify this GMP deviation by citing its inability to control day use and the perceived need for universal concessioner feeding. Additional food service capacity, if absolutely necessary, could be obtained simply by instituting efficiency measures and expanding hours of operation at the Yosemite Lodge and Curry cafeterias. In addition, a low-cost lunch option could be introduced at the Ahwahnee to utilize seats left empty due to the high prices charged at that facility.

Fourth, the CSP calls for conversion and/or expansion of food service facilities into more expensive restaurants, citing the public's "preference." No data are provided to support this conclusion. We suggest that improving cafeteria service and food quality would better serve the park visitor.

39k

8. Buildings and structures within the scope of concessions operations should be utilized or removed as per the GMP. For example, the Mountain Room Bar's present location should be returned to public use. Degnan's building, as stated above, should be removed, as should the YP&CC warehouse, and these areas restored. Other buildings or structures, such as the Curry patio added since the GMP and not authorized in the GMP, should be removed.

39l

9. Concessioner activities, programs, or profit centers added since the GMP and not specifically authorized in the GMP should be terminated at once. These include but are not limited to: Camp Curry pizza and ice cream stands; raft rentals (which have driven Park Service Merced River management policies such as elimination of natural riparian vegetation); wine tasting, gourmet food, music festivals, and other distractions designed to increase visitation levels; moonlight tram tours; vending machines; video rentals; service at Wawona golf pro shop; fudge counter at Village store; Wawona Hotel Saturday evening barbecue; charging fees for Mariposa Grove tram tours; retail sales at Tuolumne Meadows Lodge; sales of t-shirts and other items through the reservations system. No additional activities, programs, or profit centers not specifically authorized in the GMP should be created.

39k

Under the final proposal, most warehouse functions and other support services would be removed from the valley. However, there is still a need to retain several concessioner support functions in the valley. The final proposal calls for retaining the existing warehouse building rather than proposing construction of a new building in the Yosemite Village maintenance area as called for in the GMP. The existing warehouse is away from the normal visitor use area, and the visibility of its roof from valley trails can be mitigated. See responses 1a, 3d, and 34m.

39l

See response 38a.

COMMENTS

RESPONSES

Michael V. Finley
Page 8

39m

10. More data on existing and planned concessions operations should be provided to the public now so as to avoid favoring existing concessions management in the bidding process and so the public may effectively comment. The CSP provides no information on the cost of specific items proposed for investment by the new concessioner, nor has it indicated a schedule of when actions would be taken during the contract period. NPS has also failed to indicate the basis for determining the level of funds expected to be available from the concessioner or other sources to fund the proposed actions or when the funds would be available.

39n

11. Concessioner selection criteria should be discussed. NPS has stated that the CSP is not an appropriate vehicle for a discussion of the criteria by which the next concessioner will be selected. NPS proposes to reveal its selection criteria in the Statement of Requirements, a document which will not, we understand, be available for public comment. We believe this most important aspect of concessions policy should be addressed now.

Sierra Club is concerned that NPS, having no experience in letting concessions contracts for Yosemite National Park between competing bids, may use fee income generated as the deciding factor. This is inappropriate for a national park. Rather, the concessioner's efforts to preserve the park's resources and to enhance the visitor experience are the essential criteria to use in selecting the next Yosemite concessioner. A potential concessioner should be awarded extra points for demonstrating its plan to achieve these primary values. NPS should use a two-tier approach which looks first at resource protection and a natural visitor experience. Only if a concessioner passes muster in these areas should its bid be evaluated for other factors such as financial return to the government.

39o

12. Environmental impact analysis is inadequate. This is in large part because much of the activity in the specific action items is ill-defined, described vaguely, or purposely left for discussion in a future plan or study. For example, as the section "Impacts on Natural Environment" recites numerous times, there is insufficient information available to determine how the natural environment will be affected if the NPS preferred alternative is adopted. Proposed structure locations are not specified. No information is available as to the proposed new roads and parking lots.

39m See response 1b.

39n See response 1c.

39o See response 18f.

COMMENTS

RESPONSES

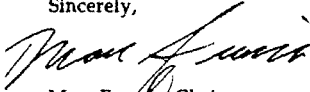
Michael V. Finley
Page 9

It is unfortunate that a document titled in part "Environmental Impact Statement" and which purports to function as a supplemental EIS to the 1980 GMP would provide so little information.

Sierra Club believes that the draft CSP violates the National Environmental Policy Act (NEPA), and we urge NPS to prepare a concessions plan for Yosemite National Park which complies with the law.

Thank you for consideration of Sierra Club's comments.

Sincerely,



Marc Francis, Chair
YOSEMITE TASK FORCE

COMMENTS

RESPONSES

SIERRA CLUB



KERN-KAWEAH CHAPTER

Printed on 100% Recycled Paper

Georgette Theotig
Chapter Chair
P.O. Box 49
Tehachapi, California 93581

February 16, 1992

Superintendent Michael V. Finley
Yosemite National Park
P.O. Box 577
Yosemite, California 95389

Re: Yosemite Draft Concession Services Plan

Dear Superintendent Finley:

The following are the comments of the Kern-Kaweah Chapter of the Sierra Club. The draft Concession Services Plan (CSP) contains some good ideas but it should be redrafted so as to follow the 1980 General Management Plan (GMP) and to ensure implementation of GMP action items. The GMP is itself a compromise between resource protection and commercial development and as such represents the minimum acceptable standard for activities in Yosemite National Park.

40a

1. Specific time tables and funding mechanisms should be provided for accomplishment of GMP action items required of the concessioner and specific means should be listed, otherwise these things will probably never be done. These issues should not be deferred and considered only in the Statement of Requirements to be published at a later date.

40b

2. Transportation, employee housing, and resource management issues are central to concessions planning and should be discussed in the CSP and not deferred to future plans. The CSP fails to require the concessioner to contribute to the removal of private automobiles from the valley. Funding for transportation should be sought now. Employee housing should be provided in El Portal, not Foresta. The impact of these issues on natural resources should also be considered in the CSP.

40c

3. An overall lodging reduction slightly greater than required by the GMP does not justify building 155 new motel units and 50 new cabin rooms at Yosemite Lodge. Equally objectionable is that the reduction is accomplished in the CSP by eliminating more low cost lodging than mandated in the GMP, thereby changing the mix of lodging available. The Park should not be converted into a year-round, upscale tourist city. The GMP should be followed.

Letter 40

40a See response 1b.

40b See response 18a.

40c See response 9b.

COMMENTS

RESPONSES

40d

4. Food Service policy should not be based on accommodating uncontrolled overcrowding caused in part by commercial day-use tours. If overcrowding is the problem as the CSP states, then NPS should address that problem, rather than merely treating the symptoms. Other means of feeding visitors consistent with the GMP should be more fully explored. Why not have more public picnic areas convenient to a grocery store? Commercial tour buses could be required to provide box lunches for their customers and these could be obtained in local communities outside the park. Refuse collection and recycling costs would be paid by the tour companies. Overcrowding should not be used as an excuse to retain the Degnan's building in violation of the GMP. Food service facilities should not be converted to expensive restaurants.

40e

5. Buildings and structures within the scope of concessions operations should be utilized or removed as per the GMP. For example, the Mountain Room Bar's present location should be returned to public use. Degnan's building should be removed, as should the YP&CC warehouse, and these areas restored. Other buildings or structures added since the GMP and not authorized in the GMP should be removed.

40f

6. Concessioner activities, programs, or profit centers added since the GMP and not specifically authorized in the GMP should be terminated at once.

40g

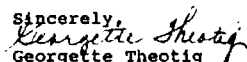
7. More data on existing and planned concessions operations should be provided to the public now so as to avoid favoring existing concessions management in the bidding process.

40h

8. Environmental impact analysis for Alternative B, the NPS preferred alternative, is inadequate. As the section "Impacts on Natural Environment" recites numerous times, there is insufficient information available to determine how the natural environment will be affected if the NPS preferred alternative is adopted. For example, no information is available as to the proposed new roads and parking lots mentioned in the section as necessary for the new lodging and other developments.

We urge you to adopt the Sierra Club's recommended plan amendments, which would better protect Park resources. The Valley should not be further pushed into a "tourist city", designed to produce a huge stream of revenue for the concessioner, and lessening the natural experience of the Yosemite visitor.

Thank you for consideration of our comments.

Sincerely,

 Georgette Theotig
 Chapter Chair

cc: Senator John Seymour
 Senator Alan Cranston
 Congressman Bill Thomas

40d See response 3d.

40e See responses 1a, 3c, 34m, and 39k.

40f See response 38a.

40g Extensive information on concessions operations will be provided to all applicants for the new concession contract.

40h See response 18f.



Sierra Club

Mother Lode Chapter

P.O. Box 1335 Sacramento, CA 95812-1335 • 916-444-2180 FAX 916-444-0669

February 27, 1992

Superintendent Michael Finley
Yosemite National Park
P. O. Box 577
Yosemite National Park, CA 95389

RE: Response to the Yosemite National Park Draft Concessions Services Plan and EIS

Dear Superintendent Finley:

VISITOR PREFERENCE

41a

Visitor preference as defined in this CSP is an inappropriate criteria to determine levels and types of services in Yosemite National Park. The NPS chooses to respond in this CSP to the visitor who is comfortable in the Valley resort environment, who expects upscale shopping, dining and lodging opportunities.

The NPS has made a clear choice to serve the more affluent park visitor. This is not so much "meeting" visitor demand—an impossibility given the 3.5 million 1991 visitors each with a "demand"—as it is shaping visitor demand, defining the visitor experience in terms of commercial services and, thus, selecting which visitors will continue to come to Yosemite.

SOCIAL AND ECONOMIC ANALYSIS

41b

Some visitors will be shut out of the Park for economic reasons by the choice to replace cheaper lodging and food service with motel rooms and cabins with baths and sit-down, indoor restaurant facilities. Others will choose not to come for different reasons. The Texas A&M University Visitor Survey finds that many California visitors who dislike the crowding and social conditions in Yosemite Valley simply stay away or, in survey terms, are "geographically displaced". Conclusion: "The social cost of the present allocation (resource allocation), in terms of displaced and disenfranchised citizens, appears very high."

The NPS should be honest about which visitor it targets with this CSP rather than talking about the graying of America and visitor preference. It should acknowledge and analyze the social and economic impact of replacing a third of the economy class accommodations in the Valley with more expensive facilities. It should consider the geographically displaced visitor whose preference is for a less developed Yosemite.

41c

Additional dollars will come to the Park Service from more expensive accommodations but costs will also be greater from increased winter visitation. The Badger Pass mid-week ski packages and seminars and conventions heavily marketed by the present

Letter 41

41a

Visitor preferences are only one element in developing levels and types of visitor services. Other factors such as statutory obligations, resource protection, infrastructure, and personnel are included in this analysis.

41b

There are undeveloped areas in Yosemite Valley and in most of the park for visitors who want a wilderness experience. Also see response 9b.

41c

The effect on NPS operational costs from the proposed changes in winter activity would be negligible.

Serving 24 counties in Superior California

Alpine • Amador • Butte • Calaveras • Colusa • El Dorado • Glenn • Lassen • Modoc • Nevada • Placer
Plumas • Sacramento • San Joaquin • Shasta • Sierra • Siskiyou • Solano • Stanislaus • Sutter • Tehama
Tuolumne • Yolo • Yuba

Printed on Recycled Paper

COMMENTS

RESPONSES

41d

concessioner have already dramatically increased winter visitor numbers. The numbers will continue to rise if motels and cabins for year-round use replace tent cabins used mainly in the summer. Profits will increase but so will transportation and visitor safety costs for the Park Service. Both costs and profits must be analyzed

EMPLOYEE NUMBERS

This DEIS cannot be considered complete without an analysis of employee numbers and housing needs and the resulting environmental impacts. Such an analysis belongs in this DEIS, not in a separate housing study, because CSP decisions about the levels and types of commercial services directly affect the number of employees needed to serve the Park concession and whether those employees are seasonal or year-round.

INTERPRETATION

On pg. 14 the CSP states, "The primary concessioner would be encouraged to supplement NPS interpretive efforts by offering specialized programs or classes, walks, exhibits. . . ." The present reality is that the majority of Valley visitors already pay the concessioner for whatever interpretation they get on the concessioner's sightseeing tours.

41e

There are so many able, knowledgeable Park Service interpretative staff members that it seems wasteful to turn interpretation into another profit source for the concessioner. Why can't the Park Service charge a fee for its interpretive activities rather than creating this new profit source for a concessioner?

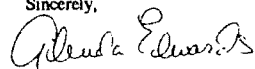
Under any circumstance, the Park Service should be in direct control of natural, historical and prehistorical interpretation programs. Park Service oversight and supervision of concessioner interpretation in Yosemite is essential to ensure that in all interpretation programs, the information is as scientifically and historically accurate as humanly possible.

SUMMARY

We feel that the levels of development in Yosemite Valley encourage visitation that is not unique to the purpose of the Park and interfere with the Park Service mission of resource protection. While the total number of pillows will, technically, be reduced below GMP levels under the CSP, year-round visitation will actually increase unless marketing stops. The visitor who waits for the relative quiet of the winter season to experience Yosemite Valley will be out of luck.

Thank you for this opportunity to comment.

Sincerely,



Glenda Edwards
Mother Lode Chapter Conservation Committee

41d

See responses 16a and 18a.

41e

The park is not allowed to charge fees for interpretive activities. Specialized for-fee programs are usually sponsored by cooperating associations or concessioners. The National Park Service does provide oversight for these programs.

COMMENTS

RESPONSES



SIERRA CLUB SAN FRANCISCO BAY CHAPTER

5237 COLLEGE AVENUE • OAKLAND, CALIFORNIA 94618-1414
TELEPHONE: 510 653-6127

ALAMEDA COUNTY • CONTRA COSTA • MARIN • SAN FRANCISCO

DELTA REGIONAL GROUP, Tim Donahue, Chairman
2412 Cambridge Drive, Antioch, CA 94509

February 25, 1992

Superintendent, Yosemite National Park
P.O. Box 577
Yosemite National Park, CA 95389

Dear Sir:

I am writing on behalf of the Delta Regional Group of the Sierra Club, with over 400 local members, to comment on the draft of the new Yosemite concessions service plan.

We all agree that Yosemite National Park is one of our most precious national treasures, and should be protected and preserved for future generations to enjoy. However, we do not believe the proposed concessions plan will fulfill that purpose. Actually, it appears that this plan's basic aim is to increase the profit margin and restrict facilities so that only the wealthy will be able to experience Yosemite.

42a

By all means, the tent cabins should be retained, and if necessary, re-located. They are in the spirit of enjoying nature at a grassroots level. ~~By no means should modern bi-level motel units be built!~~ If anything more is to be added in the way of housing, instead let it be additional basic tent shelter type units.

Don't junk up the park with more fast food units, with the excuse of making existing service more efficient--we don't need a carnival atmosphere to enjoy Yosemite's beauty. Existing cafeteria service provides healthful food efficiently at reasonable rates, and could be expanded if necessary.

42b

Retain the outdoor ice rink, as one of the few rinks in the west where families can experience a natural, oldfashioned winter sport in a natural outdoor atmosphere. The wholesome family recreation opportunity it provides far outweighs any minute environmental impact on its surroundings.

Letter 42

42a See response 9b.

42b See response 32a.

COMMENTS

RESPONSES

Yosemite National Park
February 26, 1992
page 2

42c

Establish a shuttle service, not only within the Park, but from outside the park, into the park. Many people would take advantage of this option, mandatory or voluntary, to leave their cars in an outside parking lot and hop on a shuttle. This service could also be expanded, on a reasonable fee basis, to provide shuttle service from nearby population centers, such as Fresno and Merced, so that travelers could lodge within an hour or two of the park, and take the shuttle into the park for the day. This same shuttle service could be made available to employees of the park, so that living units and employee vehicles within the park could be radically reduced.

In short, concentrate on a shuttle plan to reduce traffic and employee housing in the park, not on building in a higher profit margin with expensive motel units and empty-calorie junk food palaces. Human impact, especially on Yosemite Valley, cannot be eliminated, but thru employee and visitor shuttle services, can be lessened.

Sincerely,



Tim Donahue
Chairman, Delta Regional Group
S.F. Bay Chapter, SIERRA CLUB

42c See response 2b.

COMMENTS

RESPONSES



Sangre de Cristo Group
P.O. Box 4373 Pueblo, Colorado 81003-4373
February 17, 1992

David Johnson
Conservation Chairman
Sangre de Cristo Group
Sierra Club
1920 Greenwood
Pueblo, Colorado 81003

Michael Finley, Superintendent
Yosemite National Park
P.O. Box 577
Yosemite, California 95389

Dear Mr. Finley:

I am worried about Yosemite. I visited this great treasure many times in the early to mid 60's when I was a college student at Stanford University. Even then, my impression was that the Valley floor was too crowded and over-commercialized.

Since then conditions have deteriorated considerably. I had a temporary surge of optimism when the 1980 management plan came out. Unfortunately, many of the plans outlined have never been implemented.

My fear is that the Park Service has become subservient to the concessionaires instead of the other way around. The current draft plan does virtually nothing to relieve the congestion and crass commercialization of what used to be one of the most beautiful natural areas in the world. John Muir is turning over in his grave!

Please restore the elements of the 1980 management plan, and this time make them work!

Thank you for your attention.

Sincerely,

David Johnson
Conservation Chairman



Letter 43

43a See response 1a.

43a

COMMENTS

RESPONSES



Sumner, Mr. M. Finley

Armed Adams

SIERRA CLUB LEGAL DEFENSE FUND, INC.

The Law Firm for the Environmental Movement

180 Montgomery Street, Suite 1400 San Francisco, CA 94104-4230 (415) 627-6700 FAX (415) 627-6740

SAN FRANCISCO OFFICE

Michael Traynor
President

Vivian Parker
Vice President

Jocelyn C. May Klejman
Vice President for Development

Franklin S. Veroduk
Vice President for
Finance and Administration

William S. Corns
Julie F. McDonald
Deborah S. Rasmussen
Lawrence H. Silver
Michael R. Sherwood
Stephen C. Volker
Staff Attorney

Lauri J. Adams
Director
International Program
Earl M. Blumstein
Of Counsel

Maria Savana Kennedy
Associate Attorney

Carol Redman
Director of Development Support

Elizabeth J. Yates
Director of Major Gifts

Debra S. Vande
Associate Director of Development

Eric B. Levine
Controller

Nancy Patterson
Administrator

Toni Turner
Staff Writer

REGIONAL OFFICES

Denver, Colorado
Honolulu, Hawaii
Juneau, Alaska
New Orleans, Louisiana
Seattle, Washington
Tallahassee, Florida
Washington, D.C.

February 25, 1992

Mr. Michael V. Finley
Superintendent
Yosemite National Park
P.O. Box 577
Yosemite National Park, CA 95389

Re: Draft Concession Services Plan and Draft Supplement to
Final EIS for the Yosemite General Management Plan

Dear Mr. Finley:

I am writing on behalf of the Sierra Club, The Wilderness Society, Natural Resources Defense Council, and Yosemite Restoration Trust. This letter supplements comments on the Draft Concession Services Plan and Environmental Impact Statement (DEIS) submitted separately by these organizations. It focuses on serious flaws in the draft environmental impact statement that render the document legally inadequate under the National Environmental Policy Act and its implementing regulations.

In the DEIS opening statement of "purpose and need," the Park Service properly recognizes that the need to issue new concession contracts "provides a timely opportunity for the Park Service to review ... concession services actions and to make adjustments to the [general management] plan as necessary." (DEIS at 1.) The introduction also acknowledges that the awarding of the concession contracts will at long last allow the Park Service to achieve important General Management Plan (GMP) goals by requiring concessioners to fund implementation actions. (DEIS at 1.) The purpose of the supplemental DEIS is therefore appropriately described as a reexamination of the "appropriate levels of visitor services provided through concession operations" in light of Park Service commitment to achieving the goals of the GMP.

Letter 44



a member of Earth Share.

COMMENTS

RESPONSES

Mr. Michael V. Finley
February 25, 1992
Page 2

However, the document that follows dismally fails to grasp the "timely opportunity" it identifies. The DEIS fails to provide background information essential to evaluating whether and how the GMP should be amended to clarify concessioner responsibilities, fails to identify a reasonable range of alternative proposals for timely achieving the goals of the GMP via concession services contracts, and fails to seriously evaluate even the single alternative it proposes.

44a

A supplemental EIS must be written whenever a federal agency makes substantial changes in a proposed action that are relevant to environmental concerns addressed in a prior EIS, or when there are significant new circumstances or information relevant to environmental concerns that have arisen since an EIS was prepared. 40 C.F.R. § 1502.9(c). In this instance, it appears that both of these criteria triggered the need for a supplemental EIS. Amending the GMP in any manner that could significantly affect the timing, level, or duration of visitor use, or the transportation system that allows visitors to experience the splendor of Yosemite Valley, clearly constitutes a "substantial change" in the GMP, since control of visitor use and elimination of automobiles from the Valley were two of the primary concerns addressed in the 1980 GMP and EIS.

44b

Further, it is indisputable that new circumstances relevant to environmental concerns have arisen since the 1980 GMP was analyzed and adopted. The intent of the GMP was to implement within ten years actions to contain and limit visitor use, and to reduce and eventually limit automobile access to the Valley. More than a decade has passed, however, and the Park Service has fallen woefully short of achieving the GMP goals. Worse, the DEIS hints at, without clearly explaining, the fact that the Park Service has allowed serious violations of the GMP over the past decade. (See Memorandum to Superintendent, Yosemite National Park, from the Public Affairs Office Re: GMP Deviations, December 21, 1989.) These "new circumstances" should have been the subject of careful evaluation in the supplemental DEIS.

44c

Unfortunately, they were not. Instead, the DEIS skates over the drastic problem of non-implementation, and takes only the most superficial look at how a concessioner might feed and house ever greater numbers of visitors. The DEIS ignores the opportunity to craft reasonable alternative concession services plans that would both undo the errors of the past twelve years and move quickly in the direction of achieving the Park Service's and the public's stated intentions for reclaiming Yosemite Valley from over-commercialization, automobile pollution, congestion, and the scenic disruption caused by manmade intrusions.

The DEIS is deficient in at least the following respects:

1. Current Environment: Without an accurate description of the present state of the environment, no one — neither the public, the Park Service, nor members of

44a

While visitor use and automobile use in the valley were two concerns addressed in the 1980 GMP/EIS, the purpose of this supplemental environmental impact statement is to evaluate differing levels and types of concession services and their potential impacts. As described in the document, under "Issues Raised But Beyond Scope of Plan" in the "Consultation and Coordination" chapter, transportation planning is subject to a separate planning and NEPA process. The changes contained in the final proposal would not significantly affect the timing, level, or duration of visitor use or the traffic levels in and of themselves, nor would these proposed changes lead to cumulative effects not described within the document.

44b

The "new circumstances" asserted in the comment are actually changes in concessions operations and therefore subject to a focused plan and supplemental EIS tiering from the original 1980 GMP/EIS, as provided for in 40 CFR 1502.9 and in the CEQ memorandum "Questions and Answers about the NEPA Regulations," 46 *Federal Register* 18026 (March 23, 1981), as amended, 51 *Federal Register* 156186 (April 25, 1986).

44c

The *Concession Services Plan/Supplemental EIS* is a focused implementing plan that provides specific actions for implementing concessions goals under the GMP. Any variations between the proposal in the *Concession Services Plan/Supplemental EIS* and the proposal contained in the final GMP would constitute an amendment to the GMP.

COMMENTS

Mr. Michael V. Finley
February 25, 1992
Page 3

Congress who oversee Park Service operations – can realistically evaluate the environmental impacts of alternative proposals for concession services contracts. (See 40 C.F.R. § 1502.15.) Yet the present state of the environment is nowhere accurately described in the DEIS.

44d

The "Affected Environment" section of the DEIS mostly contains rote paragraphs about the Valley's general array of plants, animals, and other natural resources. But it does not address the specific matters that a supplemental EIS should discuss: what has changed since 1980 that triggers the need for the EIS supplement. The DEIS only states in a single paragraph that "[v]isitation to Yosemite [has] increased by 33% between 1980 and 1989," with the greatest increases in nonsummer and day use. (DEIS at 34.)

Yet auto day use was precisely what the GMP aimed to control through limitation and elimination of parking spaces. What went wrong? What have been the impacts to Valley resources and visitor experience of not implementing the GMP? The DEIS is frustratingly silent or ambiguous on these points. And what factors have caused increases in nonsummer use? Is this desirable? Again, the DEIS is silent.

Without basic information on such important matters, the impacts of amending the GMP to specify concessioner obligations are impossible to evaluate.

44e

2. Scope: The scope of the EIS is ridiculously narrow. The Park Service, having identified the concession services contracts as important tools for implementing the GMP, then developed a proposal that is short-sighted and defeatist. The DEIS presents only a fragment of GMP action items as Alternative A, and only one additional alternative that merely tinkers with the boundaries of what visitor accommodations should be provided in an admittedly overcrowded Yosemite Valley. This is not vision; this is nitpicking over facets of the problem while avoiding the problem itself.

The problem, of course, is how to utilize the concession service contracts as a means to implement the broad, and widely accepted, goals of the GMP. This "problem" defines the proper scope of the DEIS. Section 1502.4(a) of the NEPA regulations (40 C.F.R. § 1502.4) stresses that each agency "shall make sure the proposal which is the subject of an EIS is properly defined," referring to the criteria in section 1508.25, and requires that proposals "which are related to each other closely enough to be, in effect, a single course of action shall be evaluated in a single impact statement." Section 1508.25, defining the "scope" of an EIS, advises that actions which are "connected," "cumulative," or "similar" because they, in short, are all related to an identified course of action affecting a particular environment, should be considered in a single EIS.

RESPONSES

44d

Including detailed discussions concerning nonimplementation of the 1980 GMP in the "Affected Environment" section of the draft supplemental EIS would not serve to provide additional background for reviewers or decisionmakers to evaluate potential impacts of the concession proposal at hand or its alternatives. New developments that have occurred since 1980 are presented in the document, as the comment indicates.

44e

This document is a specific implementing plan tiered from the 1980 GMP/EIS. Tiering allows agencies "to focus on the issues which are ripe for decision and exclude from consideration issues already decided or not yet ripe." (40 CFR 1508.28). The document does contain discussions of direct, indirect, and cumulative impacts in the "Alternative B" section of the "Environmental Consequences" chapter. Other implementing plans such as those that focus on housing and transportation will be the subject of other environmental documents in which potential direct, indirect, and cumulative impacts will be considered.

Mr. Michael V. Finley
February 25, 1992
Page 4

The GMP, as it refers to Yosemite Valley, is all about congestion, pollution, visual conflicts, and the need to preserve and restore the Valley as a natural haven from the assaults of life in "civilization." We have in place a GMP that, if implemented, would reduce the assaults that were present in the Valley in 1980. Accomplishing this goal, according to the GMP, involves not only reducing parking spaces and lodging units, but also removing buildings that, in the context of a National Park, constitute an eyesore,¹ moving two-thirds of employee community housing out of the Park, and eventually eliminating all cars from the Valley.

The proposed plan amendment and DEIS, however, speak only to overnight accommodations and various kinds of food service, as though all other aspects of the GMP are unrelated to concessioner activities. This is clearly wrong. In fact, the awarding of concessioner services contracts raises a host of intertwined issues. If nonessential concessioner employees remain in the Park (contrary to the Plan, but still a reality), they increase the demand for commercial services in the Valley. The question of when, and where, employees will be moved is therefore inextricable from the question posed by the DEIS about the level of commercial services that should be provided in the Valley. Similarly, the question of how, and how frequently, and in what number visitors can and will be moved in and out of the Valley pursuant to the GMP's no-car goal, is inextricable from the question of what kind of food, beverage, and hotel services should be available to Valley visitors. Under various reasonable proposals, concessioners could by contract implement many of the interrelated "action items" and GMP goals ignored by the DEIS.

The DEIS therefore fails to define properly the scope of the proposal and of reasonable alternatives to the proposal. The DEIS must address all concession-related services and impacts that would, or could, fulfill the goals of the GMP. These include not only providing some mix of overnight accommodations and food service, but also locating employee housing in appropriate locations outside the Valley where services are available, and developing transportation systems for an environmentally sound and socially acceptable number of peak day visitors. All of these aspects of Valley management -- housing, transportation, and commercial services -- are "connected," "cumulative" and/or "similar" within the meaning of 40 C.F.R. § 1508.25, and therefore must be included within the scope of the concession services plan and EIS.

3. Range of Alternatives: The DEIS is clearly inadequate with respect to the range of alternatives considered. NEPA regulations state that the presentation of reasonable alternatives to a proposed course of action is the "heart of the EIS." 40

1. The 1980 EIS at 41 acknowledges that "[a]ny alteration of the environment ... is assumed to be an impact on the park's esthetic quality."

COMMENTS

Mr. Michael V. Finley
February 25, 1992
Page 5

C.F.R. § 1502.14. Yet in this case, the Park Service offers only one alternative to its 1980 GMP – and this alternative completely ignores the implementation problems of the past decade.

NEPA does not dictate the outcome of agency decisionmaking, but it does require an agency considering an action significantly affecting the environment to explore a reasonable range of alternatives. (*California v. Block*, 690 F.2d 753 (9th Cir. 1982).) No decision that we know of holds that one alternative to a proposed action constitutes a sufficient "range." And in this case the Park Service cannot point to its old EIS for sufficient alternatives because many things have changed. Visitor levels have gone up; the number of busloads of day visitors unaccounted for by the GMP has gone up; many new parking spaces not called for by the GMP have been tolerated;² employees have not been moved out of the Valley, in violation of the 1980 GMP; and no steps have been taken to eliminate cars from the Valley, also in violation of the 1980 GMP. Furthermore, the Park Service has arranged a sale of Valley facilities owned by the Yosemite Park and Curry Company that will affect the new concessioners' ability to appropriately serve the public while accomplishing the goals of the GMP.³

While the boundaries of the "reasonable range" are always subject to dispute, there can be little doubt that the two "alternatives" reviewed, both of which lack any specific deadlines for implementation, do not constitute a reasonable range. In this instance, the "reasonable range" must be wide, since the Park Service is in the privileged position of defining profit-making contract terms that will also achieve GMP public trust goals. Surely the range of alternatives that must be considered includes:

- alternatives that provide transit to reduce and in a timely manner eliminate cars in the Valley, in accordance with the 1980 GMP goals;
- alternatives that set deadlines for specific actions that have been left undefined under the existing GMP and concession services contracts;

2. Indeed, at Camp Six, the Park Service officially designated a large parking area for about 100 cars, in direct violation of the GMP.

3. The 1980 GMP EIS noted that various actions were "being considered" as means to make concessioner services profitable while achieving implementation of the GMP, but that the time was not ripe for a detailed analysis. (EIS at 50.) Clearly, the time is now ripe. A range of concessioner services plans must be formulated and evaluated with respect to the financial options noted in the 1980 EIS and the actual terms of the buy-out contract.

RESPONSES

44f

This comment does not present an alternative suggestion for a range of types and levels of services. The proposal and its alternative presented in the document are focused on levels and types of concession services to be offered in Yosemite National Park and their potential impacts. The addition of housing, transportation, and income return and its relationship to debt retirement would not constitute an additional range of alternatives but instead would skew the focus of this tiered EIS and open all GMP goals for reevaluation.

44f

COMMENTS

RESPONSES

Mr. Michael V. Finley
February 25, 1992
Page 6

- alternatives that specify when and where the concessioner must move employee housing (and related commercial facilities) out of the Valley, as well as a transit system for employees;

- alternatives that would fill any newly identified need for classes of lodging units outside the Park rather than in the Valley;

- alternatives that estimate how much income will need to be generated by concession services to pay off the debt required by the Park Service to purchase existing buildings within the Park, to maintain buildings, and to pay into a Park improvement fund for GMP actions; and

- alternatives for private sector financing of specific GMP investments, such as housing.

4. Evaluation of environmental impacts: The alternatives analyzed were so seriously inadequate as "concession services plans" as to make almost meaningless a critique of how well they were evaluated in the DEIS. A few words, however, are in order.

The two alternatives considered were not tied to any timelines, which, as the experience of the past twelve years shows, makes any evaluation of future impacts fanciful at best. Furthermore, the rate of implementation of "action items" aimed at, for example, achieving the goal of removing cars from the Valley, clearly has enormous implications for the environment over time. As one example, air pollution levels in the Valley would vary enormously depending on whether or not the concessioners were required to reduce by half or eliminate automobiles in the Valley immediately, in five years, or in ten years. None of these time-related implementation impacts is discussed in the EIS.

Additionally, although the proposed GMP amendments would decrease overnight units, they would increase winterized units and winter use of the Valley.

The DEIS pays no attention whatsoever to the environmental impacts of increasing visitor use in the fall, winter and spring months, as well as increasing summer use. This is a significant flaw, since, for example, meadows that would be impacted by increased winter/spring Valley visitation are exceptionally vulnerable to damage during the wet seasons.

The DEIS also fails to evaluate the impacts of alternative concession service plans on levels of employment, investment, and revenues both within the Park, and in surrounding gateway communities.

Furthermore, the DEIS fails to discuss any site-specific impacts of proposed new construction, even though at least some of such impacts can now readily be

44g

Winter/spring visitation is recognized and its impacts analyzed in the "Vegetation" subsection of "Impacts on Natural Environment" under "Alternative B" in the "Environmental Consequences" chapter. Potential economic impacts on gateway communities are addressed under "Impacts on Local Economies" several pages later in the same chapter. The purpose of this supplemental EIS is to analyze the potential impacts of the proposal and its alternatives. As a result, analysis of investment and revenues is not within the scope of accepted socioeconomic information. As stated in the document, any proposed construction would be subject to site-specific environmental documents.

44g

COMMENTS

RESPONSES

Mr. Michael V. Finley
February 25, 1992
Page 7

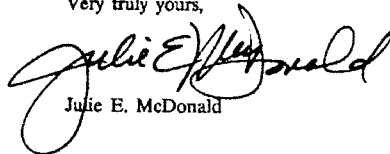
44h

identified. For example, the proposed construction of 155 new motel units would have significant esthetic impacts that the DEIS fails to acknowledge. Yet a 1989 study prepared for the Park Service on a proposal to build dormitories in the same area where the two-story motel structures are proposed concluded that the buildings would unacceptably degrade scenic values in the Valley. (Design Workshop, Inc., "Visual Assessment of Housing Alternatives in Yosemite Valley," June 15, 1989.)

In conclusion, the DEIS is so seriously flawed as to "preclude meaningful analysis." Therefore, under 40 C.F.R. § 1502.9(a), the DEIS should be withdrawn, rewritten, and recirculated for public review before any decision is made.

Yosemite is simply too important for the Park Service not to recognize these significant legal and public policy concerns. On behalf of the hundreds of thousands of people for whom this letter is written, I respectfully request that the Park Service start from scratch, take full advantage of the opportunity afforded by the need to write new concession contracts, and develop creative proposals that will at long last fulfill the goals of the General Management Plan.

Very truly yours,



Julie E. McDonald

JEM/kr

44h The final proposal does not include new motel units.



THE WILDERNESS SOCIETY

CALIFORNIA/NEVADA REGIONAL OFFICE

February 12, 1992

Michael Finley, Superintendent
Yosemite National Park
P.O. Box 577
Yosemite National Park, CA 95389

Dear Superintendent Finley:

Following the public meetings held the week of January 27th, The Wilderness Society, Sierra Club, Natural Resources Defense Council, Yosemite Restoration Trust, Audubon Society and Yosemite Action held discussions to prepare these official comments in response to your draft Concessions Services Plan (Supplemental Environmental Impact Statement (CSP\SEIS) which was issued in December 1991.

The 1916 Organic Act which created the National Park Service (NPS) is very clear about the purpose which is

"...to *conserve* the scenery and the natural and historic objects and the wildlife 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."

This mandate makes the need to *conserve* the primary goal of the NPS. Unfortunately, throughout the public meetings on the CSP, the NPS constantly referred to its obligation to serve the needs of Yosemite visitors. When Secretary Lujan addressed the NPS on the occasion of the 75th anniversary of the Park Service, he stated that the primary objective of the NPS is to preserve the resource with development for visitor use a secondary purpose. Our critique of your CSP urges a return to the primary mission of preservation and not development.

We understand the committee that prepared the draft CSP will review that document in light of the public comments received. This letter states the joint position of the six signatory organizations. We have focused on those points that must be addressed in a new draft plan.

116 NEW MONTGOMERY, SUITE 526, SAN FRANCISCO, CA 94105
(415) 541-9144

Letter 45

COMMENTS

RESPONSES

Michael Finley
February 13, 1992
Page 2

The Park Service should redo the CSP to include the eight essential missing elements that are outlined below and then discussed in detail in the remainder of the letter.

45a	1. Maximum peak-day visitation levels in the Valley.
45b	2. Establishment of public park-and-ride transportation systems to and within the Valley.
45c	3. Removal of parking spaces and restoration of areas to meadows.
45d	4. Initiation of a day-use reservation system.
45e	5. A food service and lodging plan consistent with the GMP. No new buildings unless authorized by the GMP.
45f	6. The location of concessioner offices, employee housing and transit facilities.
45g	7. A complete investment and financing schedule.
45h	8. A revised policy for selecting the next concessioner.

1. Maximum peak-day visitation levels in the Valley.

The General Management Plan (GMP) set a ceiling of 18,000 auto visitors/day based on designated parking spaces. It did not address a visitation level based on arrivals by bus. In 1991 peak day bus visitors numbered approximately 2,000/day which was about double the number in 1980. Visitor arrivals by auto on peak days have also increased substantially above the 18,000/day in 1980.

Increased auto travel to the Valley has resulted in worsening congestion on the roads, random parking and more intense use of unpaved roadside pull outs. The high visitor levels on peak days in the Valley cause crowding at scenic areas, in Yosemite Village and at eating places.

Conclusion 1. The new draft CSP must clearly state what the maximum daily visitation level in the Valley will be each year during the next fifteen year period of the CSP. This number is the keystone for determining the facilities and services the concessioner will provide. There also must be a complete environmental analysis of the impacts of the proposed level of visitation by season.

- 45a See response 3g.
- 45b See response 2b.
- 45c See response 2b.
- 45d See response 3g.
- 45e See responses 1a, 3c, and 3d.
- 45f See responses 16a and 18b.
- 45g See responses 1b and 18b.
- 45h See response 1c.

Michael Finley
February 13, 1992
Page 3

2. Establishment of public park-and-ride transportation systems to and within the Valley.

The GMP called for a system to reduce the number of cars in the Valley over the period 1980-1990, and called for eventual removal of most cars. The revised CSP should include a plan for a concessioner to own and operate the transportation system both in the Valley and to the Valley. The park-and-ride systems must incorporate the following features:

- A. Extension of the East Valley shuttle to serve locations in the West Valley area.
- B. Introduction of an interim park-and-ride bus system using 600 spaces at the existing Badger Pass parking area and 200 spaces to be provided at El Portal. If 800 cars were parked, 13% of the 18,000 daily Valley visitors would ride the bus.
- C. A requirement that cars entering the Valley during peak season are to remain parked until they are leaving. Visitors arriving in cars should not be permitted to park or stop en-route into or out of the Valley. Parking should be prohibited on both paved or unpaved roadside pull outs thereby eliminating substantial traffic and congestion.
- D. A limit on the maximum number of private autos and tour buses allowed in the Valley on a daily basis as established in the CSP. The distribution of tour buses and private autos in the Valley in relation to the number of autos parked in park-and-ride lots must be consistent with the maximum number of daily visitors determined in the CSP.

The Wilderness Society will publish a transportation plan for Yosemite in March. We will provide the Park Service with that plan and the related data that was prepared with the assistance of transportation experts. We and our consultants would be pleased to assist the Park Service as needed to develop these systems for inclusion in the revised CSP and implementation in the next concession contracts.

Conclusion 2. The CSP must call for the introduction of the park-and-ride system to the Valley with a schedule for implementation.

COMMENTS

RESPONSES

Michael Finley
February 13, 1992
Page 4

3. Removal of parking spaces and restoration of areas to meadows.

The increase in visitation has occurred in part because of the 200 designated parking spaces in the Valley added since 1980. These spaces can be found in: campgrounds, picnic areas, the Ahwahnee valet park and at Camp Six near Yosemite Village. The added spaces offset the spaces removed from the Curry dump and the roadside areas.

The revised CSP must be based on the removal of the 1,000 parking spaces called for in the GMP and the removal of spaces added since 1980, including removal of most roadside paved areas. All of these areas must be restored to meadows and forest. Concessioner funds should be set aside for restoration of parking areas.

Conclusion 3. The CSP must call for removal all non-GMP parking spaces and road side parking areas and the restoration of those areas to their natural condition.

4. Initiation of a day-use reservation system.

At present, most overnight visitors obtain a reservation in advance for campsites or lodging. A similar system for day-use visitors would make it possible for the Park Service to manage better the maximum number of day-use visitors that will be determined in the CSP.

We advocate a day use or parking reservation system analogous to those already in place at Ano Nuevo and Hearst Castle State Parks and at the Getty Museum in California.

Conclusion 4. Peak season visitors should be permitted to come to the Valley by auto only if they obtain reservations to park in assigned spaces in the Valley; or at Badger Pass and El Portal, where the visitor would take a park-and-ride bus to the Valley.

5. A food service and lodging plan that is consistent with the GMP. No new buildings unless authorized by the GMP.

This plan would serve the maximum number of daily visitors to the Valley. Again, the plan must be based on the visitor number. There should be no new buildings unless authorized in the GMP and fully justified in light of current circumstances. In Wawona, the construction of new rooms and eating facilities are no longer required since after 1980, facilities were built in nearby Fish Camp.

Michael Finley
February 13, 1992
Page 5

In addition, the NPS should plan to remove all buildings called for in the GMP. The removal of both the Degnans building and the concessioner warehouse should be included in the CSP. An analysis must be presented of how the number of daily visitors to the Valley may be served through improvements in the design and hours of operation of existing food service and expanded picnic facilities. The food service analysis must also take into account the reduced number of lodging units in the Valley, the related reductions in employees and the relocation of employees out of the Valley.

Conclusion 5. The CSP must include a detailed food and lodging plan that is consistent with the GMP and requires no new buildings in the Valley.

6. The location of concessioner offices, employee housing and transit facilities.

The CSP must include a specific relocation plan to El Portal for concessioner headquarters, support facilities, employee housing and transit. The relocation plan must be based on the following constraints:

- A. the number of concessioner employees needed in relation to the newly determined maximum visitor levels;
- B. the functions and number of employees whose residence in the valley is either essential or non-essential;
- C. the operation of a transit system for employees who live outside the park and work in the Valley; and
- D. the location of maintenance, storage and headquarters facilities in El Portal or elsewhere outside the park.

Conclusion 6. A specific plan for El Portal providing for relocation of specified Valley concessioner facilities must be included in the CSP.

7. A complete investment and financing schedule.

A financing plan is required that identifies specific sources of funds, including concessioner fees, user charges, and private investment. A detailed schedule is required for the annual receipt of funds by source. A timetable is also needed with specific milestones for individual investment actions together with the cost of each action. The actions called for should be completed in the shortest period possible, preferably within seven years.

COMMENTS

RESPONSES

Michael Finley
February 13, 1992
Page 6

The CSP must contain the amounts and timing for:

- A. receipt of concessioner fee payments;
- B. financing by the private sector for concessioner housing and support facilities at El Portal; and
- C. funding for the park-and-ride shuttle to the Valley as well as the West and East end in-Valley shuttle. Potential sources could include concessioner investment for buses and parking facilities, current add-on charges to park concession services, a dedicated portion of the park entrance fee, or a combination of these and other sources.

Conclusion 7. A detailed investment and financing plan with a schedule of implementation must be included in the CSP.

8. A revised policy for selecting concessioners.

The Park Service should adopt an additional primary selection factor that emphasizes the concessioner's ability to provide visitors with services in a manner that creates maximum enjoyment of the natural values in the park.

The Park Service should specify in the CSP the points to be awarded for each primary and secondary selection factor. This would allow the public to better understand the Park Service requirements for the concessioner. The amount of the fee paid to the Park Service (which is related to the level of sales) should not be a deciding factor in the selection of concessioners.

Conclusion 8. The present policy for evaluating concessioner bids must be amended so that a concessioner providing a more natural visitor experience is rewarded in the evaluation process.

COMMENTS

RESPONSES

Michael Finley
February 13, 1992
Page 7

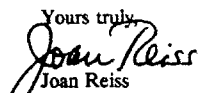
As you know, there are five important goals in the GMP which are as valid today as they were 12 years ago:

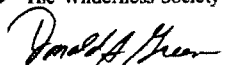
- Reclaim priceless natural beauty.
- Markedly reduce traffic congestion.
- Allow natural processes to prevail.
- Reduce crowding.
- Promote visitor understanding and enjoyment.

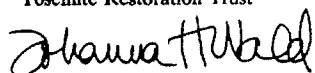
As you debate the revised CSP, allow these goals to govern your deliberations.

We would be pleased to assist in any area you feel would be helpful in your review of our comments. We look forward to seeing these comments fully incorporated in the new draft CSP followed by an appropriate period provided for written public comment.

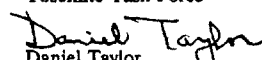
Yours truly,


Joan Reiss
The Wilderness Society


Donald S. Green
Yosemite Restoration Trust


Johanna H. Wald, Senior Attorney
Natural Resources Defense Council


Marc Francis
The Sierra Club
Yosemite Task Force


Daniel Taylor
National Audubon Society


Lesley Estes
Yosemite Action

copyrt.jr4\c\yosemite

COMMENTS



February 27, 1992

Superintendent Michael Finley
Yosemite National Park
Yosemite, CA 95389

Dear Mike:

The Yosemite Association (Y.A.) appreciates this opportunity to comment on the Draft Concession Services Plan for Yosemite. The Y.A. is a membership organization based at Yosemite National Park which operates under a cooperative agreement with the National Park Service (N.P.S.). Our over 6,000 members are vitally interested in issues affecting the park.

For over 70 years, the Association has published and sold educational and interpretive materials to the visiting public, supplemented the park's educational efforts with field seminars and other interpretive offerings, and undertaken a variety of other programs at the request of the N.P.S. The net revenues earned by the Association are used to benefit education, research and environmental programs in Yosemite, at the direction of the Park Superintendent. During 1991, donations from the Association to Yosemite exceeded \$300,000.

The Association's success is largely due to its book sales program in the park. Through the operation of seven sales facilities located within N.P.S. buildings, Y.A. has generated substantial retail sales.

Y.A. sales of books and other interpretive materials benefit Yosemite in three ways. The experiences of park visitors are enhanced by the provision of high quality interpretive materials and literature about the park, and through associated information services. The National Park Service is benefitted by augmentation of its interpretive program and through direct financial support. Park resources receive the benefits of an educated public and of the funding of research and environmental projects.

The Association's comments on the Draft Concession Services Plan (C.S.P.) were developed to reflect the relationship between Y.A.'s mission and the C.S.P. They also stem from the desire of the Association Board of Trustees to increase its support of interpretation, research and education in the park. At the heart of these comments is the critical need to have Y.A.'s interpretive publications and products available for sale in concessioner outlets throughout the term of the next concessions contract.

RESPONSES

Letter 46

46a Comment noted. The sale of products by the association in concession outlets is an operational issue.

46a

COMMENTS

RESPONSES

Additionally, at least two National Park Service goals have guided the development of these comments:

(1) The N.P.S. desire to establish new interpretive/information centers at concessioner facilities as described in the 1978 Interpretive Study (page 26) prepared in conjunction with the 1980 GMP and as elucidated by Chief Interpreter Leonard McKenzie.

(2) The N.P.S. objective mentioned in the C.S.P. (page 12 and elsewhere) to have sales items bear a direct relationship to Yosemite National Park, its environs, its history, or other related environmental or cultural topics.

The Association endorses and supports these goals, and believes that it can be an active partner of the N.P.S. in reaching them.

INTERPRETIVE/INFORMATION CENTERS

46b

One effective way to accomplish the first goal mentioned above is for the N.P.S. to provide Y.A. space within concessioner facilities to develop interpretive/information centers. Because sales of interpretive materials regularly accompany such stations, sales of books, videos and other materials could be undertaken at these centers. This would ensure that quality information is made available to the public and that Y.A. products are obtainable. Y.A. would furnish personnel to operate the stations on behalf of the N.P.S., and Park Service uniformed staff could use the centers for visitor contact and interpretation. Such an arrangement has been quite successful over the years and furthers the interpretive partnership that Y.A. has established with the N.P.S. In facilities owned by the N.P.S., space could be provided without charge. In structures where the concessioner holds a possessory interest, a lease could be negotiated.

There are a number of specific locations and situations identified in the C.S.P. where such interpretive/information centers could be installed. Take, for example, the following sites:

a. Yosemite Lodge: The C.S.P. proposes that the existing Indian gift shop be converted to an environmental shop carrying merchandise of environmentally educational value. These products are of the type that Y.A. already handles, and it would be a logical extension of our sales program to undertake this operation. As an added bonus, the shop would serve as an interpretive center. There is additional precedent for this idea in the 1980 GMP (page 39) which indicates that space freed up by the termination of clothing sales should be used for interpretation/information services.

b. Curry Village: The N.P.S. has also planned to include an interpretive/information center at Curry Village, and this was envisioned in the 1978 Interpretive Study. There are a number of appropriate sites for a Y.A.-operated station at Curry Village.

46b This issue is not within the scope of the *Concession Services Plan*.

COMMENTS

RESPONSES

c. Badger Pass: There are very few interpretive services or materials available at Badger Pass for the winter visitor. This is a prime locale for a Y.A.-operated information/interpretive/sales station. Possible spots for the center are the Visitor Activities Desk and the clothing store. The operation would serve to remind skiers and other visitors that they are enjoying a National Park experience.

d. Glacier Point: The N.P.S. has no interpretive presence at Glacier Point other than permanent exhibits and roving naturalists. An information/interpretive/sales station could easily be designed into the new gift facility there. Such an operation would be of tremendous educational value to the thousands of persons who visit this popular spot.

e. Wawona: Though only peripherally addressed in the C.S.P., the Wawona area is needful of greater accessibility for visitors to interpretive and information services. It would be beneficial to incorporate a center within the structure that houses the Wawona store and gift shop. Y.A. would also support and work to generate the funds for a new Visitor Center and orientation facility at the entrance to the Pioneer Yosemite History Center.

f. The Mariposa Grove: The C.S.P. calls for the removal of the gift shop at the Mariposa Grove. There still exists a need for information and interpretive services, and the N.P.S. has proposed a re-design of the staging area for the grove which includes an information/interpretive center complete with a Y.A. sales facility. Y.A. would be a cooperative partner at this new center.

g. Tuolumne Meadows: The C.S.P. proposes a visitor services complex incorporating the grocery store, mountaineering center and grill. This complex could easily include a information/interpretive/sales center, and one should be designed into it through the development concept plan process.

In the interim, Y.A. would be willing to and could participate in the selection process and the provision of interpretive materials for sale by the concessioner.

THE ART ACTIVITY CENTER

The C.S.P. reiterates the prescription of the 1980 GMP to close the Art Activity Center (formerly the Pohono Indian Shop) and convert it to use as a backcountry permit issuing station. Y.A. believes that the art activity program has been a remarkably successful and popular program touching thousands of park visitors, that it has been an exemplary model of cooperation between the N.P.S., the Yosemite Park & Curry Co., and Y.A., and that it should not be discontinued.

For the Art Activity function to continue, an alternate location must be found. Interestingly, the C.S.P. identifies a site which would appropriately house the center. At pages 14 and 26, the document indicates that the bank building will be used adaptively for visitor interpretation.

Y.A. would propose that the bank building be converted to use as an

46c See response 24rr.

46c

COMMENTS

RESPONSES

information/interpretive center housing a book store, art center, and seminar meeting space. Not only would this ensure the ongoing health of the Art Activity Center, it would provide interpretive services at a location near high concentrations of people.

An enormous advantage would be gained by the Association from a larger store where a full range of titles could be made available to the public. Cramped quarters in our other stores have forced Y.A. to limit its inventory and to make difficult cuts in the materials we offer. Concomitantly, interpretive services would be enhanced, and revenue potential would increase, thus increasing available financial aid to the N.P.S.

Y.A. ranks this adaptive use of the bank building by Y.A. as its highest priority in the implementation of the C.S.P. as it affects our organization. It would provide the greatest benefits to the public, the N.P.S., and Y.A.

OTHER SERVICES

At least two other areas mentioned in the C.S.P. offer opportunities for involvement by the Yosemite Association. The first is the tram tour operation in the Mariposa Grove of Big Trees. For the past several years, interpretation has been provided by bus drivers employed by the concessioner. Y.A. believes that, working with the N.P.S., it could improve the quality of the interpretation offered by placing Y.A.-employed interpreters on the trams. The cost of the program would be offset with a portion of the revenue from tram tickets. A further goal of the Association in undertaking such a program would be to explore existing technologies offering alternatives to the use of loudspeakers which can be disturbingly noisy and disruptive of the peaceful mood of the big trees. If the program proved successful, similar interpretation services could be offered for the Valley floor tours and tours from Yosemite Valley to Glacier Point and other outlying areas.

Secondly, the C.S.P. proposes that the guest lounge at Yosemite Lodge be used for interpretive/information services (page 26). Depending upon the size of the space that is freed up for such services, the Cliff Room (or whatever the lounge might be called) could be used at various times as the venue for fee-based interpretive programs (similar to those offered through the Yosemite Theater). This would further supplement the interpretive program and advance the goal of placing interpretive centers within concessioner facilities.

HOUSING AND TRANSPORTATION

Given the complexity of the many issues that attend the C.S.P., the Yosemite Association believes that consideration of park housing and transportation plans would be best made in conjunction with the concession plan. Y.A. recommends that the N.P.S., if at all possible, combine the review of all three

46d See responses 2b and 18a.

46d

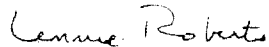
COMMENTS

RESPONSES

plans into one process which would allow an integrated perspective and a better understanding of how the plans fit together. Both of these crucial issues directly affect Y.A.'s employees, volunteers, and our operations in the park.

On behalf of the Board of Trustees of the Yosemite Association, I thank you again for the opportunity to comment on the C.S.P. We welcome the challenge to increase our assistance to the park, and look forward to many more years of providing service to Yosemite and its visitors.

Sincerely,



Lennie Roberts
Chair

COMMENTS

RESPONSES

YOSEMITE NATIONAL PARK SOCIETY

LONG BEACH CHAPTER

Members---Klouis and Wilmer Horton

January 29, 1992

To: THE NATIONAL PARK SERVICE

First, let^{us} state our qualifications for speaking about Yosemite. My husband and I have been visiting Yosemite for 45 years, 2 or 3 times a year, and for the last 37 consecutive Christmas seasons. I keep a journal and this was our visit number one hundred and one! We are members of the Yosemite Assn. and contributors to the Yosemite Fund. We participated personally in the GMP 11 years ago, so we do have a Yosemite background. However, a plan made 11 years ago is not necessarily the best plan for the fast changing conditions in this country today. In our 45 years of visiting Yosemite, we find it looks much, much better now, is much better managed, and we think IP&CC as concessionaire is doing an excellent job under difficult circumstances.

Now some comment on some of the issues. CUT ACCOMMODATIONS BY 20.5%. It is our opinion in this day and age, it is not possible to accommodate all the people who would like to come, but cutting units by 20.5% is the most ridiculous thing I can think of. We talk with many people in our time in Yosemite and at least 90% of them think things are pretty good the way they are. Their one complaint is that it is so hard to get reservations. Not only does the

plan want to reduce lodging, but to destroy perfectly good buildings. One of them is beautiful, comfortable, affordable PINE COTTAGE which they say is in the 100 year floodplain! By the same token, you could say all of Yosemite Valley is in the "flood plain" so let's get everything out of the Valley!! We have been staying in this building for 37 years winter and summer, and it is the preferred choice of many old timers who come often as we do. They are appalled at the thought of it being destroyed. How many of you know the history of that building? It was the first building at the new Yosemite Lodge. The front Desk and the cafeteria were still housed in an old Army Barracks building across the road. It was the pride and joy of Mary Curry Tressider who personally saw to its beautiful furnishings and decor all in a charming Provincial style to match the building. I have pictures that show this. It should be put on the Historic Register. I would like to say more about that at another time.

A few more comments, obviously I cannot speak to every item in this short time. Why destroy a nice ICE RUN when it is already there. It is a "natural" winter activity. Would that little area returned to a meadow give more pleasure to people than skating in winter?

A new GROCERY STORE at Curry. Why? If you reduce the number of people there will be less need for groceries and it seems better to have them concentrated in one spot as it is now.

Moving the LODGE AT TUOLUMNE. What real purpose will it serve? It is barely used 3 months of the year.

Do not reduce HOUSEKEEPING CAMP. If absolutely necessary, only by a very few units. It is the only place many younger families can afford, and the camping experience is wonderful for children. Many of our friends have stayed there with their children, and now their grandchildren go there.

Letter 47

47a The final proposal calls for retaining Pine Cottage and taking appropriate measures to mitigate flooding. Instead of a new grocery store being built, an expanded grocery store would be developed at the Curry Village meadow deck. Tuolumne Lodge would be retained. Also see responses 24gg and 9b.

47a

COMMENTS

RESPONSES

NATIONAL PARK SERVICE

page2

47b

We cannot see moving all Company Hdqtrs and Personnel out of the Valley. The traffic and pollution on the 2 lane road to El Portal would be worse than the Hollywood Freeway at rush hour. All personnel may be needed in minutes as proved by the devastating fire in August 1990.

In SUMMATION let us say we think as things are being done now is not all bad. The Park is beautiful, it is being enjoyed by those who are fortunate to be there, it is an unforgettable experience. We want to preserve the Park for future generations, but the present generation must be able to enjoy it, too. Not just the backpacker or hiker, but also for those who do need a good bed at night.

Respectfully,

Two people who love and care for this great Park,

Elaine & Wilmer Horton

Elaine and Wilmer Horton

2220 Magnolia Ave #4

Long Beach, Ca. 90806

47b See response 16a.

COMMENTS

RESPONSES

page 3

SUPPLEMENT TO LETTER TO THE NATIONAL PARK SERVICE
FROM KLOUISE AND WILMER HORTON DATED JAN. 29, 1992
WHICH WAS DELIVERED PERSONALLY TO SUPT. FINLEY
AT THE MEETING IN LOS ANGELES JAN. 29.

TRAFFIC CONGESTION: We do not believe DAY USE ONLY should be encouraged. This is one of the causes of heavy traffic as day use visitors drive around more than overnight guests who use the shuttle busses. We believe each room should have a numbered parking space, plus some area for the day use visitor. The total elimination of the personal car from the Park is absolutely not feasible in the near future, perhaps not in this decade. A car is part of your family!. We agree with IP&CC that there should be parking to accommodate the established visitor level.

47c

BUS RAMPOLISHED and NO CAR SERVICE in the Valley. As long as one car goes into the Valley, there needs to be car service. I do not think the various Auto Clubs will be happy to pay for a tow truck from El Portal to Yosemite and back just to start a dead battery or some other problem.

FINANCING: Where is all the money coming from to do all the things the NPS wants as they are always short of money? If they have a "possessory interest" in all the buildings, (if I understand this correctly), can they keep them up as nicely as Curry does?

Obviously, we cannot comment on every aspect of the GMP, and we are not necessarily against all of it. John Muir is supposed to have said standing at Inspiration Point, "what a magnificent Valley", and standing there today you have the same view and man's intrusion is scarcely visible. Let's remember, MODERATION in all things, and that the Park really belongs to the people.

Thank you for listening to us,

E. & W. H.

Klouise and Wilmer Horton

Yosemite National Park Society

Klouise and Wilmer Horton
2220 Magnolia Ave. #4
Long Beach, Ca. 90806

47c

Under the final proposal, the Yosemite Lodge service station would be retained and would offer light vehicle maintenance and minor repair. Vehicles requiring heavy maintenance or major repair would be towed to El Portal. A ranger escort would be provided if necessary to ensure safety.

COMMENTS

RESPONSES



Yosemite Restoration Trust

"[T]he valley, comprehensively seen, looks like an immense hall or temple lighted from above. But no temple made with hands can compare with Yosemite."

—John Muir

Monday, January 27, 1992

Superintendent
Yosemite National Park
P.O. Box 577
Yosemite National Park, CA 95389

Dear Mr. Finley:

We appreciate very much the opportunity given to the public to comment on the Draft Concession Services Plan for Yosemite, issued in December 1991. To our knowledge, it is the first time the Park Service has brought the public in on the decision-making process that precedes the award of a major concession contract.

Our organization was founded with the explicit purpose of ensuring implementation of the General Management Plan, with primary focus on the active participation of concessioners. Our first priority is the protection of the natural values of Yosemite.

We have encouraged the Park Service to hold public hearings on the Concession Services Plan and are pleased that meetings have been scheduled in several places.

We are very disappointed in the contents of the draft Plan. It represents a major departure from the GMP with very little data or analysis supporting the rationale for the changes proposed.

We request the immediate release of the draft housing plan/EIS. We also request that a revised draft Concession Services Plan be issued for public comment, based on the actions called for in the GMP. The revised Draft CSP should incorporate specific proposals for housing and headquarters relocation, parking space reductions, and transportation facilities for the public.

We request that NPS respond to our comments in accordance with the requirements of the National Environmental Policy Act.

This letter and enclosed response to the Draft Concession Services Plan/EIS replaces my letter and response dated January 24, 1992.

Yours truly,

Donald S. Green

116 New Montgomery Street • Suite 516 • San Francisco • CA 94105 • 415-543-9062

Letter 48

Board of Directors

William Alsop

Robert O. Banowies
Palisades Interstate
Park Commission

Harvard L. Butcher
Amsterdam Pacific Corp.

Peter Dangelmoed
Dangelmoed & Assoc.

George T. Frampton, Jr.
The Wilderness Society

Richard N. Goldman
Goldman & Company

Richard Martyr
American Youth Hostels

Robert Maynard
Woody Creek, CO

Juan Reiss
The Wilderness Society

Sarah Rockwell

Dr. Edgar Wayburn
The Sierra Club

Donald S. Green
Executive Director



Yosemite Restoration Trust

"[T]he valley, comprehensively seen, looks like an immense hall or temple lighted from above. But no temple made with hands can compare with Yosemite."
— John Muir

Board of Directors

William Alsop

Robert O. Bineswies
*Palisades Interstate
Park Commission*

Bernard L. Butcher
Amsterdam Pacific Corp.

Peter Dangermond
Dangermond & Assoc.

George T. Frampton, Jr.
The Wilderness Society

Richard N. Goldman
Goldman & Company

Richard Marry
American Youth Hostels

Ruben Maynard
Wendy Creek, CO

Joan Reiss
The Wilderness Society

Sarah Rockwell

Dr. Edgar Wayburn
The Sierra Club

Donald S. Green
Executive Director

RESPONSE TO THE

YOSEMITE DRAFT CONCESSION SERVICES PLAN

January 27, 1992

COMMENTS

RESPONSES

YRT Response to Draft CSP, January 27, 1992

1 The Vision for Yosemite. In 1980, the Park Service issued their General Management Plan for Yosemite. It was an historic document, created over five years with the massive participation of interested citizens. The Plan was based on five broad goals of far reaching significance quoted below.

1. Reclaim Priceless Natural Beauty. Yosemite is too valuable to use for administration, maintenance, parking, or any commercial services that do not contribute directly to a quality park experience. Outstanding natural areas that have been developed for uses such as staff housing, office space, warehousing, a golf course, and a beauty shop will be reclaimed. Facilities in the Valley that do not relate directly to enjoyment of the park ... will be relocated outside the park. Visitor facilities in Yosemite Valley ... that are intrusive or cause environmental damage will be removed or relocated to more resilient settings.

Once this development is gone from the park's most magnificent settings, the scenery that inspired the philosophy of John Muir and the art of Ansel Adams will begin to be restored.

2. Markedly Reduce Traffic Congestion. Increasing automobile traffic is the single greatest threat to enjoyment of the natural and scenic qualities of Yosemite. In the near future, automobile congestion will be greatly reduced by restricting people's use of their cars and increasing public transportation. And the day will come when visitors will no longer drive their private automobiles into the most beautiful and fragile areas of the park. The ultimate goal of the National Park Service is to remove all private vehicles from Yosemite Valley.

The Valley must be freed from the noise, the smell, the glare, and the environmental degradation caused by thousands of vehicles.

3. Allow Natural Processes to Prevail.... The natural processes that are occurring in the park's ecosystem must be understood and allowed to prevail. In developed areas like the Valley, facilities will be removed from floodplains and from geologic hazard areas, in deference to these natural phenomena ...

In areas that have been disturbed by man's activity, natural processes will be allowed to restore the scene.

4. Reduce Crowding. Opportunities to enjoy the park will be reoriented to ensure that overcrowding does not interfere with visitor enjoyment or threaten park values. Appropriate visitor use levels have been established for areas throughout the park, and facilities such as day parking and overnight accommodations will be based on these levels....

5. Promote Visitor Understanding and Enjoyment. The amount and kinds of information and interpretive programs available to visitors will be greatly increased.... The intent of expanded and improved visitor programs is to help ensure that a visit to Yosemite becomes a lifetime treasure.

COMMENTS

RESPONSES

YRT Response to Draft CSP, January 27, 1992

Following the statement of goals, the GMP concluded:

Full and forceful commitment to the goals (of the GMP) is needed, and this nation has the skill and the desire, expressed in public advocacy, to achieve them. The park will celebrate its centennial in 1990. By then, there should be tremendous improvement in the quality of the visitor experience in the park.

II Sad to say, the centennial has come and gone and virtually nothing of this grand plan has been accomplished. In fact, the circumstances that called forth the GMP have become worse. The need for action is even greater today than in 1980, with annual visitation having increased from 2.5 million to 3.5 million.

- o The facilities in developed areas slated for removal are still there; restoration of those areas to their natural beauty has not occurred.
- o Crowding, instead of being reduced, has become much more severe. Accommodations have not been reduced and parking areas have been expanded.
- o Traffic congestion has become gridlocked during peak periods, forcing closing of the Valley entrance to cars; no public transportation is available for a park-and-ride shuttle.

III The proposed Concession Services Plan totally subverts the General Management Plan. Amendment of the General Management Plan through this process is inappropriate. The information presented is not sufficient to evaluate the effects of the proposed changes; thus the environmental impact analysis is entirely inadequate.

The GMP is the approved, authoritative Park Service blueprint for Yosemite. It can be changed only by full public review of all aspects, including housing, concession services and transportation. The Park Service Concession Services Plan looks only at accommodations, food services and merchandise sales. It does not present a clear statement of where employee housing will be located, where concessioner support operations will be located, what transportation system will be provided for employees and visitors and what level of visitation will be permitted. It is entirely inappropriate to try to amend the GMP without consideration of these factors.

Moreover, the changes to the GMP proposed by the Park Service are not only wrong procedurally, they are wrong in substance. We vigorously disagree with the specific changes proposed by the Park Service presented below.

1. Contrary to the proposal, there should be no new motel buildings, such as the proposed six, two story, 24 unit motels at the Lodge; nor should there be building of upgraded cabins.

48a See responses 1a, 2b, 3c, and 18f.

COMMENTS

RESPONSES

YRT Response to Draft CSP, January 27, 1992

2. Contrary to the proposal, the concessioner plan should eliminate:

- o all parking spaces added since the GMP
- o the concessioner warehouse
- o Degnans
- o clothing and sports sales
- o converted Lodge lounge area as a bar

3. Contrary to the proposal, relocation of employee housing and concessioner headquarters should be to El Portal, which was obtained for this purpose, or elsewhere outside the Park; Foresta or elsewhere in the park is not acceptable.

Specific comments on these points are presented in the appendix.

48b

IV Rather than amending the GMP, the proposed Concession Services Plan should be consistent with the GMP. Therefore, the only acceptable bases for actions by the new concessioner are those called for in the GMP (shown under Alternative A in the Park Service Concession Services Plan). In addition, the Concession Services Plan should clearly set forth the methods by which the next concessioner will be required to implement the GMP.

48c

A. The CSP should set forth a concrete timetable and financing plan with milestones defined to implement the concessioner GMP actions as soon as possible during the next contract. The Park Service proposes concessioner payments of \$7.3 million to finance the \$77 million GMP alternative during the fifteen year contract. Our analysis supports completion of most of the GMP concessioner actions during the first half of the contract, provided that an appropriate fee rate is charged and that the private sector is allowed to finance development of employee housing in El Portal.

48d

B. The CSP should require the Park Service to select a concessioner who will preserve Yosemite and enhance the natural experience of visitors. The public's vision of Yosemite Valley is influenced dramatically by the vision of the concessioner who shapes the entire experience of the visitor. Instead of maximizing revenues and commercialism, the concessioner should open a window on the history and natural values of the park. One of the most significant decisions the Park Service will make will be its selection in 1993 of the new concessioner.

The Park Service has an historic opportunity in Yosemite, the largest park concession, to introduce major changes in concessions policy. Concessioner ownership of buildings has been eliminated as a financial barrier to entry for new firms, along with the preference historically given to the incumbent concessioner.

For the first time, firms will be given a fair opportunity to offer their services on a competitive basis. Firms should be evaluated on how their proposed operations will enhance protection of the park and the visitors enjoyment of its scenery, in a non-commercial atmosphere appropriate to the park setting. Competition along these lines would generate creative solutions to long lines, crowding, and other degradations of the Valley visit.

48b See responses 1a and 3c.

48c See responses 1b and 18a.

48d See response 1c.

COMMENTS

RESPONSES

YRT Response to Draft CSP, January 27, 1992

The policy for selecting among competing firms must be revised to make preservation of the park a primary factor. The current policy favors those bidders who will act to increase activity, increase revenues and are able to pay a higher fee. The policy should be changed so that the level of fee paid will not be a deciding factor in the selection of concessioners.

C. The Draft CSP should be issued for public comment after revision to reflect actions called for in the GMP, and incorporating specific proposals for housing and headquarters relocation, parking space reductions and transportation facilities for the public.

The Draft Housing EIS must be released early in February and the time allowed to respond to the CSP should be extended to incorporate public comments on the housing plan. The housing plan is an integral part of the concession plan. To treat them separately does not allow inter-related cost and funding priorities to be assessed by the public.

COMMENTS

RESPONSES

YRT Response to Draft CSP, January 27, 1992

Appendix A

SPECIFIC COMMENTS ON THE CONCESSION SERVICES PLAN

Submitted by

YOSEMITE RESTORATION TRUST

48e

I The CSP should call for implementation of the GMP by the year 2000

1. Pick the lower development, least cost GMP alternative
2. Charge a 6-8% fee with proceeds for the GMP Improvement Program
3. Permit private sector financing for concessioner housing in El Portal
4. Implement the GMP by the year 2000, not some time after 2015

48f

II The CSP should call for reduced development in the park and restoration of areas to meadow

5. No new motels or cabin buildings in the park
6. No additions or new buildings at Wawona
7. Remove Degnans building and improve food service efficiency
8. Move concessioner's headquarters to El Portal
9. Move concessioner's warehouse to El Portal
10. Move all non-essential employee housing to El Portal

48g

III The CSP should call for reduced commercialism in the park

11. Don't upscale accommodations
12. Remove clothing, sports equipment and gift sales from the Village store
13. Return the free public lounge area at the Lodge

48h

IV The CSP should call for reduced congestion: it should introduce transit, reduce parking, restore to meadow

14. Implement a day-user reservation system for the summer season
15. Remove all unauthorized parking spaces and restore to meadow
16. Issue a separate concession contract for a bus system to and from nearby communities and within the park
17. Secure funding now for a Transportation Plan

48i

V The CSP should provide for selection of a concessioner who will preserve the park

18. Evaluate firms on how they propose to protect the park and enhance the visitors enjoyment of its scenery, not the level of fee offered
19. Introduce contractual incentives for rapid implementation of the GMP

48j

VI The CSP should be revised, incorporating specific proposals for housing and headquarters relocation, and transportation, based on the GMP, and further public comment allowed on the new draft plan.

20. Release the NPS Draft Housing Plan/EIS immediately

48e

See response 1b.

48f

In the final proposal, lodging would be reduced from the amount called for in the GMP: no additional lodging would be constructed at Wawona, and a general store would not be built at Curry Village. In areas where developments were removed and no others added, vegetation would be restored to the plant community type that existed before development.

48g

See responses 18b, 36c, and 39k.

48h

See responses 2b, 3g, and 3h.

48i

See response 1c.

48j

Comment noted

General Note:

The following detailed comments have been noted.

YRT Response to Draft CSP, January 27, 1992

See page 255.

I Implement the GMP by the year 2000

1. Pick the lower development, least cost GMP alternative

We have made the following estimated breakdown of total investment costs shown in the Plan for the actions proposed by the Park Service, compared to the costs of actions called for under the GMP.

INVESTMENT COSTS

Action	GMP Proposal (Millions of constant 1990 dollars)	NPS Proposal
Lodging	6	12
Food Service	5	10
Groc/Merchandise	3	4
HQ, Warehouse, Maintenance	8	6
Transportation	3	2
Other	5	6
Total	30	40
Housing*	47	65
TOTAL	77	106

* The GMP alternative uses the El Portal location for housing. The NPS proposal reflects the higher cost of housing in Foresta because no infrastructure exists there now.

By adding facilities in the park, unnecessary development is built in the park rather than being left to the private sector in gateway communities. Additional revenues from the NPS proposal over the GMP would amount to an estimated \$200 million over the life of the contract. These revenues are not needed to implement the GMP. The \$200 million should be going to the gateway communities in return for investments they would make if the development proposed were not approved for the park. These gateway investments would mean more employment in those communities instead of in the park.

2. Charge a 6 to 8 percent concessioner fee with proceeds for the GMP Improvement Program

The Park Service has not indicated the annual receipt of funds likely to be available to finance the plan over the 15 year contract from the concessioner fee payments or investments. The current concessioner pays a fee of .075% of revenues and pays for maintenance and repair of buildings it owns in the park.

COMMENTS

RESPONSES

YRT Response to Draft CSP, January 27, 1992

Our analysis has determined that a 6 to 8% fee may be paid by the concessioner. While this is lower than the 20% fee paid for a similar management contract in Yellowstone, and lower than the 22% fee proposed by Secretary Lujan for the larger parks, it is consistent with other elements of the Plan to be paid for by the concessioner.

- o It allows for a separate concessioner repayment of the debt to MCA/Matsushita to purchase the concessioner-owned buildings in the Valley for the Park Service.
- o It allows the concessioner to continue paying separately for maintenance and repair of buildings, as in the past, and to receive an appropriate risk related return on their investment.

3. Permit private sector financing for employee housing and other buildings in El Portal

Housing and other facilities at El Portal may be financed with private funds, provided the Park Service makes use of the special legislative authority provided in 1956 and in 1986 to enter into agreements with developers and commit to long term leases for concessioner (and Park Service) employees.

A study commissioned by the Trust and sent to the Park Service in November demonstrates that such funding is feasible and would save the government \$26 million, over half of the total housing costs. These savings would then be used for other GMP investments. The development could start as soon as the Park Service Housing Plan/EIS is released and approved. It need not wait for government appropriations.

Private financing of housing has the strong added advantage of permitting concessioner and Park Service employees to own their home or apartment. This is not possible with government owned housing in the park.

4. Implement the GMP by the year 2000, not some time after 2015

The draft Concession Services Plan provides neither a timetable of expected concessioner receipts to fund the investments proposed, nor the cost or implementation schedule of major items proposed for investment. In fact, the Superintendent indicated very little would be accomplished in the first few years. This is a serious failing of the draft Plan.

The Yosemite Restoration Trust has conducted its own analysis of implementation costs and financing sources. The analysis presented provides the basis for concluding the Plan can in fact be accomplished in a period shorter than fifteen years.

See page 255.

COMMENTS

RESPONSES

YRT Response to Draft CSP, January 27, 1992

Selecting the \$77 million GMP alternative, and having the private sector finance employee housing and transportation, all the actions called for can be financed over the 1994-2000 period. The table below shows the sources of funds during that period, expressed in the same 1990 dollars shown in the CSP for the cost of the plan.

YRT GMP FINANCING PLAN, 1994-2000 (millions of constant (1990) dollars)

Concession Fees	\$48
Private Sector Housing Finance	26
Private Sector Transportation	3
TOTAL	\$77

II Reduce development in the Valley and restore areas to meadow

5. No new motels or cabin buildings in the park

A. No new motel units or cabins should be built within the park, nor should existing units be upgraded. Lodging for higher priced accommodations is being provided by the private sector outside the park, in nearby communities. The Park Service's concession management guidelines specify that in-park units may not be added when the private sector can meet the need outside the park.

B. The NPS proposes a substantial shift away from Curry Village and to the Lodge, along with a substantial increase in the number of year-round accommodations with bath, as shown in table I.

TABLE I

LODGING

	Current	GMP	NPS
Yosemite Lodge			
Rooms	290	274	445
Cabins	100	32	50
Room w/o Bath	16	0	0
Cabin w/o bath	89	58	0
TOTAL	495	364	495
Housekeeping	280	232	232
Curry Village			
Motel	18	18	18
Cabin	103	100	247
Cabin w/o bath	80	90	0
Tent Cabin	426	335	100
TOTAL	627	543	365
Ahwahnee	123	123	123
TOTAL	1525	1258	1215

See page 255.

COMMENTS

RESPONSES

YRT Response to Draft CSP, January 27, 1992

See page 255.

C. While not explicitly stated in the Plan, the Park Service has said the proposed 155 motel room additions to the Lodge would be constructed across from the service station where there is employee housing and be similar in construction to the existing large motel buildings. The addition of 155 motel units will necessarily involve six new, two story, 24 unit buildings, contrary to the GMP. The cost of such units is estimated at over \$5 million.

D. Construction for these large new motel facilities and for the large quantity of new cabins with bath to replace tent cabins and cabins without bath at the Lodge and Curry Village would involve additional electric, water and sewer lines to individual units. Construction would cause temporary disruption to visitors throughout the affected areas and permanent damage to the natural environment from construction, repair and maintenance of the more extended and upgraded system.

6. No additions or new buildings at Wawona

While the GMP proposed 45 new rooms at Wawona in 1980, since then substantial new accommodations have been built outside the park at Fish Camp and Oakhurst. The Park Service policy is to provide accommodations and related facilities inside the park only when such facilities are not available at a reasonable distance to the park.

There is no need for either new rooms or eating facilities proposed by the Park Service at Wawona.

7. Remove Degnans and improve food service efficiency throughout the Valley

We reject the Park Service's proposal to retain Degnans, reduce capacity at the Village Grill and convert half of the Curry Village Cafeteria to a 200 seat family style restaurant. Food service needs can be met through more efficient use of existing facilities, expanding open hours over the lunch period, and providing more picnic facilities.

YRT Response to Draft CSP, January 27, 1992

See page 255.

Table II presents the Park Service plan for all food service by location.

TABLE II
FOOD SERVICE SEATS BY LOCATION
UNDER THE PARK SERVICE PROPOSAL, GMP AND ADJUSTED GMP

	Actual	SEATS		NPS Proposed
		GMP	GMP Adjusted	
Ahwahnee	425	425	425	425
Curry V inside	388	325	325	400
Curry V outside	251	0	250	250
Total, Cur V.	639	325	575	650
Yos. Lodge	676	632	632	650
Village Grill	286	286	286	150
Degnans inside	172	0	0	370
Degn's outside	150	0	250	250
Tot: Yos Vllg	608	286	536	770
TOTAL	2348	1668	2268	2495

Notes to table: "GMP Adjusted" means the GMP prescriptions plus retention of the patio at Curry Village ("Curry Village outside") and creation of a part-outdoor, part-sheltered picnic area in the area now occupied by Degnans.

The Park Service asserts that the increased demand for mid-day food service requires the retention of Degnans with additional seating capacity and expansion of the eating area at the Lodge. At the same time the Park Service proposal calls for reducing capacity at the Yosemite Village Grill and converting half the Curry Village Cafeteria to family style wait-person service restaurant. The latter change is to meet visitor preference; the former to make room for other activities at the Village store.

Retaining Degnans and using the Village Store for gifts and sports are contrary to the GMP. When the food service needs of the Valley are examined, relative to the approved visitor population, neither action appears to be needed.

There are several improvements that may be introduced that are consistent with the GMP to more effectively and efficiently feed the number of visitors in the Valley over the lunch hour:

- Retain the 136 seats at the Village Grill proposed for elimination by the Park Service.
- Expand lunch time service from 1.5 or 2.5 hours in some locations to 4 hours at each location as needed.

COMMENTS

RESPONSES

YRT Response to Draft CSP, January 27, 1992

- Achieve a major increase in the number of persons served through more efficient systems in the thirty percent of all seats located in the two cafeteria areas.
- Provide frequent shuttle service from the Lodge and Yosemite Village to Curry Village where lines are shorter and advise visitors where they are waiting of this option.
- Provide a low cost option at the Ahwahnee for lunch, and take advantage of empty seats there.
- Increase number of picnic tables and let people know where they are located, including length of walk.

Introduction of these proposed changes in food services, along with enforcement of GMP authorized visitor use levels by area, will meet adequately the demand for lunch service.

8. Move concessioner's headquarters to El Portal

The location is not specified for the move of the headquarters, data processing and other functions; rather they will go to the site chosen for the employees' housing - either El Portal or Foresta. The move to El Portal should be called for in the Plan. Some functions, such as data processing and accounting, possibly may be moved to another remote site such as Fresno, reserving limited space at El Portal for employees who need to be in the park.

9. Remove the concessioner's warehouse

The Park Service proposes to retain the concessioner's warehouse and not relocate the light maintenance functions to the Park Service maintenance facility. This is the most inappropriate unsightly area used in the Valley and should be removed as called for in the GMP. The necessary functions of the concessioner to be conducted in the park may be moved to the Village Store as proposed in the GMP. The grocery store will be down-sized to reflect lower numbers of resident employees and the removal of the gift and clothing sales areas.

10. Remove all non-essential employee housing to El Portal

The GMP called for moving the residence of all employees out of the Valley except for those whose residence in the Valley was essential for the performance of the job function. This included relocating 840 concessioner employees to Wawona, to the El Portal site or elsewhere outside the park.

A housing plan and EIS were completed and are scheduled for release in February. The alternatives examined were Foresta and El Portal. Foresta is in the park; El Portal is an administrative unit outside the park, set aside for the purpose of housing and other functions.

A recently released study on employee transit requirements estimated the cost of providing transportation for 600 employees to be relocated to El Portal or Foresta. The draft housing plan/EIS must be released immediately for public comment since the cost, location and financing proposed is critical to the achievement of concessioner GMP goals.

See page 255.

YRT Response to Draft CSP, January 27, 1992

III Reduce commercialism in the park

11. Don't upscale accommodations

In terms of affordability, the Park Service proposal reduces the number of lower-cost cabins without bath and the least expensive tent cabins from the current level of 506 to 100, compared to the GMP proposal of 425. The Park Service proposal, compared to the GMP, would double the cost for a family of four from \$100 to \$200 for a three night stay for the 200,000 persons who would otherwise be using these facilities over the summer months.

The Park Service noted the lower priced cabins and tents are last occupied and least desired, but did not say how many were in high, first choice demand. The occupancy is close to 100% from June thru August and from 80 to 90% for May and September. While the high occupancy may reflect second choice for some, it also reflects the preference of many for the lower priced accommodations. It also reflects the choice of others to be in the Valley without a bath, rather than out of the park where rooms with bath are available.

The Park Service need not upgrade its currently allowed level of lodging to meet the first choice of some visitors. To do so would create hardship for many, prohibit visits by some, and create additional demands on the park resource that are not necessary.

12. Remove clothing, sports equipment and gift sales from the Village Store

The GMP called for eliminating clothing, sports and gift sales at the Village Store. The Park Service proposes to retain all three. There will still be a gift shop at the Lodge and Ahwahnee; clothing, sports and gift items are available at stores outside the park. There is no justification for changing this GMP prescription.

The Park Service also proposes moving the Mountaineering shop from Curry Village to the Yosemite Village Store. The mountaineering shop should remain at Curry Village, as called for in the GMP, leaving space in the Village Store building for other necessary concession operations.

13. Return the free public lounge area at the Lodge

At the time of the GMP, the Lodge had a comfortable free public lounge area with a splendid view of Yosemite Falls, a fireplace and library. The lounge was used for interpretive programs, letter writing and reading.

Since 1980, most of the lounge area was taken over by an expanded bar with big screen TV. Part of the area was divided off for convention use and other group meetings, not for the general public. The old bar room was converted to high price "white tablecloth" dining room. The public lounge area should be restored, correcting this deviation from the GMP.

See page 255.

COMMENTS

RESPONSES

YRT Response to Draft CSP, January 27, 1992

See page 255.

IV Reduce congestion: introduce transit, reduce parking, restore to meadow

14. Implement a day-use reservation system for the summer season

As visitation to the park increases, there will be a continuing increase in the number of summer days during which cars are stopped at the gates to the Valley and prevented from entering until others leave. This system is unfair, and an unneeded annoyance. All visitors during peak months should be required to have a reservation, just as those wishing to stay overnight must have for Valley lodging or Valley campgrounds. Such a system will enable more effective enforcement of the parking restrictions called for in the GMP. It will also facilitate the introduction of necessary parking and shuttle bus reservation systems.

The day use reservation system may also be used to allocate scarce visitor slots among day use tour bus and non-tour visitors. This will also help to manage crowding at view sites and eating areas.

15. Remove all unauthorized parking spaces and restore to meadow

The parking areas in the Valley have expanded substantially over those authorized at the time of the GMP. The unauthorized spaces and areas now used should be restricted immediately. Areas now inappropriately used for parking should be restored to meadow. This would include the very unsightly and ruinous use of meadow at camp 6, across from the Village.

Parking should be provided now at El Portal, as called for in the GMP, and alternative bus transport to the park provided. Similar park and ride service should be provided at Badger Pass and at gateway cities. Motels outside the park should arrange for shuttle service for guests. Overnight visitors in the Valley, except campers, also should be required to park outside the park and take a shuttle bus during peak season.

If greater restrictions on peak day, peak hour entry are necessary to meet the GMP goals, they should be imposed.

16. Issue a separate concession contract for a bus system to and from nearby communities and within the park

There is no reason to delay the first phase of the necessary new transportation system to, from, and within the Valley. A new concession contract for transportation, open to competition, should be issued to design and operate a bus system to the park from nearby communities and for the shuttle within the park, extended to the West end of the Valley.

17. Secure funding now for a Yosemite transportation plan, to replace cars in the Valley by the year 2000

The GMP calls for eliminating 1242 day use parking spaces, providing alternative bus service to the Valley, with parking facilities at the bus transfer point. It is not a complicated program. But it will take time and money for the Park Service to prepare a plan and issue it for public review. No steps have been taken yet for this to happen.

YRT Response to Draft CSP, January 27, 1992

The absence of a plan for eliminating autos, twelve years after the Park Service announced its intention to do so, reflects the low priority given to this important action by the past and current administrations. Steps should be taken now to secure funding for a transportation plan from available sources, including appropriations if necessary.

There are several opportunities available now to obtain \$350,000 in funds needed by the Park Service to complete a Transportation Plan. The Park Service should:

- Immediately use the Yosemite portion of funds specifically appropriated this fiscal year for a 12 month study for alternative transportation methods in Yosemite, Denali and Yellowstone.
- Immediately allocate five percent of the \$6 million special grant provided by MCA to the Park Service as part of the buy-out agreement. (The funds flow through the National Park Foundation.)
- If necessary, allocate additional funds from the FY 1992 or FY 93 Public Lands portion of the Highway Act.
- If necessary, seek new appropriations in FY 93.

The transportation system will be self-financing.

The proposed larger park-and-ride shuttle system to the park will require new forms of financing. Elsewhere in the National Park System where transportation for entrance is required, concessioners charge a fee to cover such costs. An increase in park entrance fees from \$5.00 to \$10.00 was specifically designated for transportation in Yellowstone and Grand Canyon. Either of these methods would be appropriate for Yosemite. If a change in legislation is required, the Park Service should propose it.

V Select a concessioner who will preserve the park

18. Evaluate firms on how they propose to protect the park and enhance the visitors enjoyment of its scenery, not the level of fee offered

Management experience, financial capability, and responsiveness to the Park Service request are the primary factors now used by the Park Service to evaluate bidders for concession contracts. Firms should be evaluated also on how their proposed operation of the concession will enhance protection of the park and the visitors enjoyment of its scenery, in a non-commercial atmosphere appropriate to the park setting. Competition along these lines would generate creative solutions to long lines, crowding, and other degradations of the Valley visit.

The level of fee payment proposed is a secondary factor, though it may be deciding. The current policy tends to favor those bidders who will act to increase activity, increase revenues and therefore pay a higher fee. The Park Service policy should be changed so that the level of fee paid will not be a deciding factor in the selection of concessioners.

See page 255.

COMMENTS

RESPONSES

YRT Response to Draft CSP, January 27, 1992

See page 255.

19. Introduce contractual incentives for rapid implementation of the GMP

Recent letters to the Park Service from concession executives and from the Conference of National Park Concessioners have opposed all major elements of the GMP. They favor continued expansion of commercial activities in the park.

Changes called for in the GMP will increase concessioner costs, reduce revenues and reduce profits. A system must be introduced to the contract that will provide an incentive to the winning concessioner to implement rapidly the GMP, offsetting the negative effect on revenues and profits.

VI. The Draft CSP should be issued for public comment after revision to reflect actions called for in the GMP, and incorporating specific proposals for housing and headquarters relocation, parking space reductions and transportation facilities for the public.

20. The Draft Housing EIS must be released early in February. A revised draft CSP should be issued that incorporates the proposed employee housing, food and lodging, parking and transportation actions.

The location of employee housing, transportation provided for employees and transportation systems for the public are integral parts of the concession plan. To treat them separately does not allow inter-related cost and funding priorities to be assessed by the public.

COMMENTS

RESPONSES

Written Testimony Presented By the Union To Park Service

February 27, 1992

We are the Yosemite Teamsters represented by Local #386 of Modesto, California and employed by Yosemite Park and Curry Company. We represent approximately 150 Teamsters in Yosemite, ranging from Service Station Attendants, Maintenance Mechanics, Garage Personnel, Driver Tour Guides and Warehousemen. The future of Yosemite is very important to us. We live here. When you leave, we're still here.

We agree with the goal of the GMP; reclaiming the priceless natural beauty, reducing traffic congestion, allowing natural processes to prevail, and promoting visitor understanding and enjoyment.

We disagree, however, with your plan to get there. We feel the greatest threat to the park is the Day user. The plan does not address this. The number of visitors in such places as Little Yosemite Valley, Vernal and Nevada Falls, and Half Dome during the peak periods has a tremendous impact on the natural resources of the Park. There are no services in those areas but the sheer number of visitors does not allow for a quality wilderness experience, not to speak of the litter and human waste disposal problems.

Letter 49

49a See response 3g.

49a

COMMENTS

RESPONSES

The NPS has concluded that the "major cause of traffic congestion in the Valley is the day user." They travel into and out of the park each day and tend to use their car as a mobile base, whereas overnight visitors leave their cars parked. Fewer rooms inside the Valley will cause more people to drive into the Valley each day. By encouraging the shift of accommodations from inside the regulated environment of the park to outside, the Park Service relinquishes control of how the Park is promoted. The original GMP did not anticipate the imbalanced impact upon the park of the day visitor. The problems affecting Yosemite today are very different from the problems of 12 years ago. Twelve years ago overnight visitations was seen as a greater concern. The various new hotels on the border of the park did not exist in 1980. We feel the plan deserves change in the light of the greater impact of day use.

49b

Further the plan does not address other major issues, such as housing, transportation and community life. While moving housing out of the Valley has strong emotional appeal, there also are strong arguments that the Park, it's visitors, the employees, and the regional environment benefit from having housing near the workplace.

49c

The plan also does not contain an economic analysis. A full study is necessary to understand the financial impacts on both the concessioner and the surrounding area, including Mariposa County. Without this, we believe the plan will only attract fast-buck

49b See responses 2b, 16a, and 18a.

49c See response 11a.

COMMENTS

RESPONSES

artists and this will put the park in untrustworthy hands.

The new concessionaire should not be awarded the next contract based on cutting employee wages and benefits to make a profit. The average employee seniority is 5 years and average age is 33 years. It would be a terrible loss to throw away that much expertise, a combined total of over 1000 years of experience.

More emphasis should be placed on controlling the number of day users in Yosemite Valley and the backcountry along with proper waste disposal in the wilderness areas, rather than if the walls of hotel rooms are canvas or wood or where the Bank machine is located.

We also feel you have taken micromanagement to new heights by amending the master plan to say where the concierge's desk should be at the Ahwahnee.

We must think of Yosemite in a regional perspective. Moving services out of the park will not solve problems but simply shift them out of a controlled area. Pollution knows no boundaries and we must protect the areas outside the park if we want to truly protect the park for future generations.

Thank you,

The Yosemite Teamsters, Local 386 Modesto, California

COMMENTS

RESPONSES

AMERICAN TRADITIONS

5780 CLOUDS REST • MARIPOSA, CALIFORNIA 95338
(209) 742-7713

February 25, 1992

Superintendent
Yosemite National Park
Post Office Box 577
Yosemite National Park, California 95389

Dear Mr. Finley:

I am writing in response to the Concession Services Plan Environmental Impact Statement released in December, 1991, concerning Yosemite National Park. My letter is motivated by a concern for a new policy outlined in the plan that would require future concessionaires in Yosemite, and in all probability all national parks, to be confined in their purchase of handcrafts and Native American art to local and regional sources. While my concerns regarding the Concession Services Plan include its neglect in addressing transportation and housing problems, the increase of food services and the reduction of affordable guest accommodations, I will focus my statement on retail services.

I should point out from the outset that I lived and worked in Yosemite National Park between 1979 and 1986. During that time I served as a retail buyer and division manager for the Yosemite Park & Curry Company, with responsibilities that included purchasing and developing product for ten gift shops within the Park. I now own a company that provides Native American art, crafts and silverwork to museums, galleries and a number of National Parks, including Yosemite. We currently represent over 200 Native American artists and craftsmen.

On page 12 of the Concession Services Plan it states as follows. "Handcraft items representing park and regional themes, including crafts by local and regional Indian artists, would be encouraged and sought; conversely, handcraft items from other regions of the United States would not be sold." It goes on to say on Page 13 the "regional Indian and other handcraft items would be sought to replace handcrafts from other regions of the country." While I never found the term regional specifically defined in this plan, it seems obvious that by rejecting Native American work from neighboring states and by providing a regional map within the plan, the area in question is limited to a small section of California.

Letter 50

COMMENTS

RESPONSES

Superintendent
Yosemite National Park

February 25, 1991
Page Two

50a

While I agree strongly that product sold in retail outlets throughout the Park should better reflect themes conducive to Yosemite, its natural wonders and environmental concerns, a policy that requires a potential concessionaire to be limited by some regional boundary in pursuing such work is neither practical or realistic and certainly not in the best interests of the Park or its visitors.

With visitation exceeding 3 million people annually, the volume of product being purchased through Yosemite's retail outlets is staggering. While I applaud the reduction of retail space in the Park, I don't believe it will significantly impact the volume of sales. Those wishing to purchase product within the Park will still be confronted with ample opportunities and sales will simply become more centralized. The volume of product being sold in the Park will probably change very little and could possibly increase with a more conducive product mix.

To rely solely on craftwork that is available regionally would dramatically inhibit any potential concessionaire's ability to provide the volume and diversity of product necessary for such a large operation. Having attended major gift and craft shows in California for many years, I can say with confidence that regional resources whose work reflects themes conducive to Yosemite are extremely limited at best. Organizations who have made a business out of selling product that is nature or environmentally oriented, such as the Nature Company or the National Wildlife Federation, learned very quickly that there is no region within the United States that has an abundance of this type of product and to succeed they have sought work not only from all areas of the United States but throughout the world.

There are numbers of good craftsmen in this country whose work reflect an appreciation and respect for nature. Should their work be dismissed simply because they don't reside within a very small regional boundary? There are craftsmen throughout the world whose products promote environmental awareness as most of the concerns we are faced with today aren't simply regional, but global. Should visitors to Yosemite be deprived of the opportunity of exposure to this type of work?

If the National Park Service truly desires a more conducive and appropriate product mix within Yosemite or any park within its authority, it must not tie the hands of potential concessionaires by limiting its resources in such an arbitrary and dramatic fashion.

It is quite admirable to promote local or regional work, but the Park Service must develop a greater awareness of its obvious limitations. I believe that pursuing product that either educates or enhances ones appreciation for nature and its fragility is a very positive direction taken within the Concession Service Plan. However, dramatically limiting resources as you have will certainly be its undoing.

50b

Another area where this policy of regional preference is to be applied is in the representation of Native American craftwork. With the elimination of the Indian Shop at Yosemite Lodge and the requirement that Native American art come

50a See response 6a.

50b See response 6a.

COMMENTS

RESPONSES

Superintendent
Yosemite National Park

February 25, 1992
Page Three

from regional resources, this will all but eliminate any real representation of Native American art in Yosemite National Park.

It is common knowledge that the availability of Native American crafts being produced in California today is almost non-existent, with only a small handful of individuals still active. There is also a good deal of competition by dealers and collectors for what little work there is and it is unlikely that Yosemite could ever represent any significant amount of it. It should also be pointed out that unlike work from other Native American groups currently being represented in Yosemite, California basketry and related crafts are usually priced well beyond the budgets of the average Yosemite visitor.

This policy has already been promoted by some in the concessions office in Yosemite. Some stores in Yosemite, realizing the difficulty in securing such work, have begun purchasing and encouraging non-traditional craftwork from local Native Americans. There is a real danger that the integrity of California work will be compromised due to the pressure already being placed on the current concessionaire to conform to this policy. One gentleman within the Concessions Office has actively and openly discouraged the sale of "non-regional" Native American craftwork over the past six months. I came up to the Park in November after scheduling an appointment with him. He never showed (I waited two hours) and he never called with an explanation or apology.

I believe, despite its limitations, Northern California work should be represented and encouraged. I also believe that representations of non-Native American product that reflect Southwestern themes have no place in Yosemite. With the growing popularity of Southwestern design and products, an ever increasing number of non-traditional product has surfaced. In the past few years, much of this product has found its way into Yosemite and other national parks. A large selection of molded pottery, supposedly hand painted by American Indians, is represented in almost every store in Yosemite. Pastel coyotes, chip inlay jewelry and souvenir tipis are further examples of work that is inappropriate. Southwestern style crafts and giftware certainly should be eliminated, Native American craftwork should not. Traditional Native American art has always had a place in national parks throughout the country and have been represented in Yosemite for over sixty years. For many years the National Park Service encouraged such work with reductions or even elimination of concession fees with their sales in a number of western parks. Traditional Native American art has always been well received by visitors to Yosemite and has consistently been one of its strongest product categories. Those who enjoy and purchase this work are neither insulted or care about the fact that this work does originate in California, for most realize that Yosemite is not a regional or state park, but a national park. For many foreign visitors, national parks offer the only opportunity to see Native American craftwork.

The vast majority of Native American work represented in Yosemite come from two specific groups which include the Navajo and Pueblo Indians, and both are located within the Western United States. These people were the original inhabitants of this country and have always revered the land and its creatures. They were this country's first naturalists and environmentalists

COMMENTS

Superintendent
Yosemite National Park

February 25, 1992
Page Four

and have long had a deep reverence of nature and its protection. The craftwork they create strongly reflects their deep respect for all aspects of nature and their lives and their work is literally tied to its rhythm. From the carving of an owl, coyote or bear kachina, from their spiritual pursuit of honoring the earth by hand coiling native clays and soils into pottery, or using exceptional lapidary and silversmithing skills that expresses the beauty of natural stone and nature related designs, each represents the purest expression of the natural world in product form. While this work may not be historically tied to the Yosemite region, its significance in expressing the natural world and its recognition as a national treasure makes it an appropriate and important part of the product mix within Yosemite and other parks. Perhaps what really is needed is simply better interpretation and more appropriate merchandising. This would insure that the spirit of your policy would not be compromised.

50c

I would like to express my concern and total dismay with the Park Service for developing a policy that so dramatically effects Native Americans without giving them a voice in the process. Those who will suffer the greatest hardships were never granted any input and were never contacted by the National Park Service or the Department of Interior. National parks are an important and critical part of Native American sales and this policy, should it be enacted in Yosemite and parks, will have a dramatic effect of people who are already suffering great economic hardships. Unemployment among most of the Native American groups who would be effected by this policy is more than twice the national average. The sales of craftwork contributes a critical source of income to the Native American economy and losing much of the national park market would have a profound and detrimental effect on thousands of people.

The relationship between the U.S. government and Native American people has far too often consisted of back room politics and a string of broken promises. The Department of Interior has been entrusted to protect the interests of Native Americans. It is difficult to understand how this can be done when they are not given an opportunity to contribute input on issues that affect them.

Special interest groups such as the Indian Arts and Crafts Association and the Indian Arts Foundation, which in the past have worked closely with the Indian Arts and Crafts Board of the Department of Interior, was also never informed of this policy or given an opportunity for input. Helen Skredergard, director of the I.A.C.A., has asked me to express her dismay at how a policy could be developed without seeking the input of those who are most greatly affected.

Perhaps most surprising is the fact that the Indian Arts and Crafts Board and the Bureau of Indian Affairs within the Department of Interior was also never notified or given an opportunity for input. They only became aware of this policy after the Concession Service Plan was released and upon my office calling theirs in Washington for their comments.

To allow a small group of people to develop such a policy while ignoring, and in reality suppressing what the Park Service must have certainly realized would have been a negative response from Native Americans, special interest groups and even those entrusted within the Department of Interior to oversee Native

RESPONSES

50c

Copies of the draft *Concession Services Plan* were sent to the California Native American Heritage Commission, The American Indian Council, and the Mariposa Indian Council. We regret the oversight of not sending a copy to the Indian Arts and Crafts Board of the Department of the Interior. They, along with other Native American organizations, have been added to the mailing list.

COMMENTS

RESPONSES

Superintendent
Yosemite National Park

February 25, 1992
Page Five

American affairs, brings into question the very integrity and ethics of this process. I can say with some assurance that those who have been denied will be responding and that a dialog will take place. This issue is potentially explosive and I encourage the Park Service to quickly reexamine its conclusions as this policy will surely be challenged in court by those Native American groups whose work would be excluded. I would also encourage the Park Service to be more responsive and sensitive to the human resource and recognize that to suppress and ignore the rights of any Americans to participate in a process that affects their lives is simply not consistent with democratic values.

In conclusion, I would like to reemphasize that this policy of setting regional boundaries for product procurement will undermine the very thing that the Park Service is attempting to accomplish, and that is to provide an appropriate and conducive product mix within the retail outlets of Yosemite. To succeed in this objective, product must be judged by the nature of the craft, not by arbitrary restrictions of origin or the personal tastes and preferences of a small handful of individuals. This policy is not in the best interests of those who visit the park, and it will not allow existing and future concessionaires to meet the challenges you have placed before them.

The next concessionaire will be faced with tremendous challenges in Yosemite. With an investment in excess of \$100 million dollars, any future concessionaire will be concerned with any policy that restricts its ability to profit. With concession fees tied to revenues, I would think the Park Service would also share deeply in those concerns. The Concession Services Plan is very vague and inconclusive regarding retail sales and many important issues simply are not addressed. Perhaps the most glaring omission is the heavy reliance on mass produced product from Korea, Taiwan and Japan. This work represents a far greater compromise on the integrity of national park retailing than any craftwork. It also represents a much larger percentage of sales. To close the door on American craftwork while leaving it wide open for cheap imported trinkets, is quite difficult to understand. The new contract provides an excellent opportunity for positive change in Yosemite, but only if it is based on sound policy and realistic expectations. While I respect the credentials of all those who contributed to this plan, I would encourage a greater awareness of the challenges and complexities involved in retailing in a national park environment.

While I have tremendous respect for Ed Hardy, Y.P.C. Co. and other firms currently expressing interest in the Yosemite Concession, I feel that the park would be best served by a non-profit organization. Besides funneling profits into much needed work in Yosemite, it would be easier to encourage better services if less emphasis is placed on the bottom line. The real winner would no longer be stockholders, it would be all those fortunate enough to enjoy Yosemite in the years ahead.

Sincerely,



Greg Owens

COMMENTS

RESPONSES

JEANNE ADAMS
President
General Manager

BEST'S STUDIO, INC.
BUSINESS OFFICE
6770 N. WEST AVE.
SUITE 101
FRESNO
CALIFORNIA 93711
209 435 5971
FAX 209 431 7152

SINCE 1902
VILLAGE MALL
BOX 455
YOSEMITE
NATIONAL PARK
CALIFORNIA
95389
209 372 4413
FAX 209 372 4714

THE ANSEL ADAMS GALLERY

February 6, 1992

Superintendent
Michael Finley
National Park Service
Yosemite National Park, CA 95389

Dear Mike:

Thank you for inviting our response to the Concessioner Services Plan. We concur that over-commercialism in National Parks is wrong. This may be the best opportunity the National Park Service has to make truly major changes to de-urbanize the magnificent Yosemite Valley, let it be appreciated in its natural majesty. The Plan must be considered within the context of the vision 100 years into the future, and integrated within the transportation systems, staging areas, funding requirements. Senator Cranston's comment to provide incentives for concessioners who are environmentally responsible is an interesting concept. The concessioner helps fulfill the two-fold management issue mandated for the Parks. Will any viable, rich, bidding concessioner become dedicated to the ethic Yosemite needs?

Because of our direct involvement as National Park Concessioners for 90 years in Yosemite, I shall address the proposal's probable impact on our small family business. Proposal B would close Best's Studio, Incorporated, doing business as The Ansel Adams Gallery. The Symposium commemorating the 75th anniversary of the National Park Service emphasized the need for its encouraging "partnerships" to accomplish essential functions and funding in this economy of insufficient NPS budgets. We have supported the community and Service in numerous ways during the past 90 years as partners for Yosemite. If the intention of the National Park Service is to terminate this relationship and the operation of the Ansel Adams Gallery (Best's Studio, Inc.) in Yosemite National Park, you may wish to skip the following information which illustrates the context and rationale for the current merchandise mix, its appropriateness, and how much of the profits derived are contributed for the welfare of the Park and larger environment. The concluding paragraphs focus on the legal guarantees protecting concessioner investment.

The Ansel Adams Gallery needs a balanced and diversified merchandise mix to remain in business. We are hereby requesting that an independent economic impact study be done on the potential effects on the Gallery by any proposed changes in our concessioner services-- by plan or statement of requirements.

When Harry C. Best began his studio in Yosemite in 1902, he sold paintings, photographs, and curios. His business even included making pictures of people at Mirror Lake in the morning, and selling them when the visitors completed their outings at the end of the day. Each season (May through September) Harry and Sarah Anne Best brought their daughter, Virginia (Best Adams) to

Letter 51

51a In response to public comment, the proposal has been revised to allow the Ansel Adams Gallery to retain a broader scope of merchandise.

51a

COMMENTS

Yosemite. She attended school with the Indians and children of the early settlers, and has kept up her life-long love of Yosemite and Californiana. By the time Harry Best rebuilt his studio in its present location, Ansel Adams, who was training to be a concert pianist, had befriended Harry Best (on whose piano he practiced in Yosemite) and his lovely daughter, Virginia.

Ansel Adams, an only child, had persuaded his parents to take him to Yosemite in 1916 for a family vacation after reading *In the Heart of the Sierra*, by J. M. Hutchings. Yosemite captured his imagination and provided inspiration to him from that moment to his death in 1984. Ansel Adams became a living legend --an internationally respected artist and genius, who interpreted the mountains and natural landscape in their nobility. His prominence as an early environmentalist, who was convinced that unique lands must be conserved, led in part to the establishment of Kings Canyon National Park. In the artistic world, Ansel Adams was known as a master photographer, as an advocate, a teacher, an author, and innovator. One of these first innovations occurred with the making of "Monolith, the Face of Half Dome," on April 14, 1927. He called it "previsualization," and exposed his last 6 1/2 x 8 1/2 glass plate negative to achieve in the actual photograph the emotion he felt at the time.

Virginia Best and Ansel Adams were married in her father's studio January 2, 1928. When Harry Best died in 1936, Virginia inherited the concession and chose to continue its operation with Ansel. Ansel and Virginia moved from San Francisco to Yosemite. One of their first decisions was to dispose of the curios and anything they felt beneath the dignity of a National Park (shrine). Ansel wrote "Problems of Interpretation of the Natural Scene" (regarding National Parks) which was published in the 1945 Sierra Club Bulletin. Best's Studio, Incorporated, under Virginia and Ansel Adams' direction emphasized books, Indian handcrafts, photographs, cards, film, and photo finishing. Since 1971 Michael and I have continued the quality and values, upholding this high standard and example.

In 1929 Ansel Adams and Mary Austin created the beautiful Taos Pueblo book. While Ansel photographed on Indian reservations in the Southwest, Virginia went with the wives of the traders, selecting Navajo, Zuni, Hopi, and Pueblo jewelry and handcrafts. This tradition of offering American Indian handcrafts continued when Virginia and Manager Ernest Johanson first included me on the buying trips in the Southwest thirty years ago. Best's Studio (doing business since 1972 as The Ansel Adams Gallery) has enjoyed a reputation of integrity for over 60 years for quality Indian handcrafts of authentic origin (materials and workmanship). The basis for our enthusiasm for carrying Indian crafts as part of the inventory mix is its distinct historical context of Ansel and Virginia in the Southwest. Native American

RESPONSES

COMMENTS

hand-crafts sales have been encouraged by the Park Service. Profitability of the merchandise mix supports photography.

In-Park sales of photographs account for approximately 10% of the gross revenue. Of these, only two thirds of the Yosemite Special Edition Prints are sold in the Park to Yosemite visitors (6-7% of gross revenue). Of the Ansel Adams fine art photographs, fewer than one in eight are sold in-Park. Our clients are national and international, private individuals and dealers. There is no way that the Gallery could sustain itself if "limited to Ansel Adams- and park-related photography sales and services, as was originally intended." And, Virginia Best Adams has confirmed that there was NEVER an intention that Best's Studio be limited to being a photography store.

"Photographic" is even a limited term. Another interesting fact is that "imaging" may supersede photography as a fine creative art form. The world doesn't stand still, particularly as technology advances rapidly with scanning and digitized imagery that provide a platform upon which to begin creative expression. Ansel Adams was often the first to embrace and endorse new technology, as shown with his long consulting relationship with Dr. Land and the Polaroid Corporation. We appreciate the fact that the National Park Service likes the energy, love, and space we devote to photography in the store. We believe that the team who developed the proposed guidelines did not realize that photography sales and profitability are so marginal that the store would fail if restricted to photography. Terminology for the new contract needs to be sufficiently broad that all creative expression (even that not yet existing) is included as this category of our merchandise mix.

Our buildings are even considered historic because of artists Harry C. Best and Ansel Adams and the four generations of Best/Adams family ownership and operation. Because of the acclaim The Ansel Adams Gallery has received as a the premier concession in the National Parks, we do not think it was the intention of the Concessions Service Proposal to limit merchandise in such a way that it effectively kills our family business.

The General Management Plan referred to the Ansel Adams Gallery as both interpretive and commercial, a unique distinction which pleased us. The personnel who make up the Gallery are well informed and assist the visitors in many ways. Perhaps their gracious helpfulness earned that designation. Another possibility is our creative photography workshop program, which Ansel began in Yosemite in 1940. His was the original alternative photography education; workshop participants still come from all over the world. An unexpected honor and recognition of the national esteem credited to our Workshop program was that the Eastman Kodak Company asked me to design

RESPONSES

COMMENTS

RESPONSES

and present an international workshop / symposium on the teaching of photography for professors of photography in Rochester, New York, at the Rochester Institute of Technology. The amazing part is that ten universities and colleges in the proximity have excellent photography programs. Why would they come to Yosemite for direction? The program was wonderful, profound in many lives. The photography education is an exciting dimension in the experience of both our participants and regular staff. Ansel believed creative photography to be the highest form of interpretation in Yosemite, and the Workshops most appropriate. The photography education program, including free visitor camera walks, are sustained by the profits of the current merchandise mix. To be able to continue the program, given new restrictions, we will need to develop better meeting space, which will cost additional money. Without Visitor Facility Funds, costs of remodeling the Darkroom building will have to be borne by the operating income.

Another component of our merchandise that is well received by visitors is the book selection. In our commitment to esthetics, environment and education, we offer a wide range of provocative and enlightening books to ponder and enjoy in nature and on vacation. People are delighted, finding titles that they have been unable to locate in their more standardized urban bookstores. We believe this to be a real service to the future. A Yosemite community adjunct of this emphasis is our work with the Yosemite and El Portal Elementary Schools and Wawona in building their libraries with donations of books, expertise, volunteers, and money. The Gallery has begun working with the Yosemite public library in building the resident selection of current books. Books (mostly non-photographic) are the most significant part of our merchandise mix. Giving back to the community would not be possible if the Gallery were not allowed to sell books, to exist. Besides this, sharing books and their insights, gives all of us great pleasure.

The community and conservation programs which now benefit from Ansel Adams Gallery donations would suffer if the business were jeopardized. The Gallery is generous with supporting relevant causes which positively impact the future, such as Mono Lake, community schools and libraries serving employee families of Yosemite, the Yosemite National Park Centennial Symposium, Child Care Centers, the Executive Council for Regional Biodiversity of the State of California, (I serve as a member of the steering committee of the Sierra Summit), the Yosemite Photographic Survey, etc. We are advocates for sustainability of the environment and enrichment of lives through exposure to inspired thinking. For 20 years we have offered free programs (such as camera walks and demonstrations) to visitors in Yosemite.

For 90 years our family has demonstrated commitment to Yosemite National Park and the National Park idea. Our dedication comes

COMMENTS

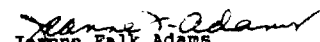
RESPONSES


from a spirit of public service and from the assurance of Public Law 89-249, the Concessions Policy Act, that our investment is protected and we are guaranteed a reasonable profit. Our structures in the Park date from 1926 and require extensive capital improvements and maintenance to keep them safe and operational. Although the National Park Service now owns the majority of our buildings, it has no funds for upkeep and improvements. Thus, the responsibility and investment becomes our burden; normally, the landlord is responsible and pays, and should be entitled to possessory interest and credit toward the next contract. Mitigating factors will be necessary, as there is no return on new capital investments. In fiscal year 1991, such costs were \$145,000. Should the historic buildings rot?

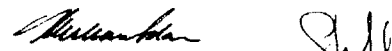
Employee housing has been a complex problem. The General Management Plan for Yosemite urges location of non-essential personnel and functions outside Yosemite National Park. The Gallery complied, in part because we did not have housing for the manager and space for the equipment required to remain competitive today. The business office is located in Fresno, which has increased the operating expense. The financial viability of The Ansel Adams Gallery will also depend upon the National Park Service Statement of Requirements of the new contract, whenever that might occur. If lodging in Yosemite Valley is reduced, the adverse impact from day use visitors will be more intense in the several hours they drive around. This, too, will reduce sales. We request that an independent auditor perform an economic impact assessment to determine feasibility for any of the proposed guidelines that are considered for approval.

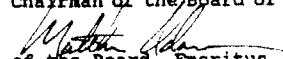
The Ansel Adams and Best/Adams family tradition is an integral part of Yosemite's history and cultural/economic fabric. We have operated and worked in behalf of Yosemite National Park and the Park visitor since before the National Park Service was established. Our daughter Sarah, Director of Fine Art Photography for our business, graduated from New York University in art history. Our son Matthew (graduate of Pomona College) works for the Public Lands Restoration Task Force of the Izaak Walton League, restoring watersheds in California, Washington and Oregon. The next generation of Adamases are ethical and prepared to continue the fine tradition, with your cooperation.

Sincerely,


Jeanne Falk Adams
President/General Manager


Virginia Best Adams, Chairman of the Board, Emeritus
cc. California Congressional delegation; National Park Service


Michael Adams, M.D.
Chairman of the Board of Directors


Matthew Adams

COMMENTS

RESPONSES



Consulting and Executive Search for the Hospitality Industry

January 22, 1992

Reply To:
Tucson Office

Superintendent Michael Finley
Yosemite National Park PO Box 577
Yosemite CA 95389

Dear Superintendent Finley:

Enclosed are my comments upon the draft Concession Services Plan. I am sorry that I will be travelling on business next week and so will not be able to participate in the public hearings.

In trying to comment upon the Concession Services Plan I came to the following general conclusions which, in turn, inform my specific remarks.

1. The proposal is badly flawed as it exists as a one legged stool without the Transportation and Housing Plans which closely relate to it. These three plans--Concession, Transportation, and Housing cannot be considered separately.

2. It is inevitable that the 1980 GMP will be modified as the development plans take shape and as time brings changing needs and understanding. It is essential, however, that any proposed changes reflect the letter and spirit of the goals set forth in the original document.

3. In my comments I have tried to keep in mind the Visitor Use Objectives set out on pages 8 and 9 of the GMP. In brief, they are: (a) To provide for orientation, (b) make interpretive services available, (c) provide only types and levels of programs that enhance visitor understanding and enjoyment, (d) permit only accommodations and services necessary for visitor use and enjoyment, (e) to give the opportunity for a wilderness experience--which I define rather broadly stressing "opportunity", and (f) provide transportation services that facilitate circulation and enhance preservation and enjoyment.

4. I have discussed operational concerns, particularly in regard to food and beverage service and merchandise activities because I believe that a concession services plan cannot be concerned only with numbers and physical facilities. Obviously there is much more that can be said on this subject, and all others, but I think that the examples illustrate the thrust of my thinking and my beliefs as to what kind of a concessioner is needed.

P. O. Box 5606
Hilton Head Island, S.C. 29928
(803) 842-6989 FAX (803) 785-2650

4413 N. Summerset Loop
Tucson, AZ 85715
(602) 886-4163 FAX (602) 886-4271

TechWorld Plaza
800 K Street N.W. - Suite 500
Washington, D.C. 20001
(202) 682-5333 FAX (202) 682-5343

Letter 52

COMMENTS

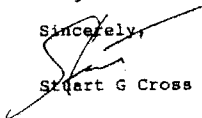
RESPONSES

B.I.A.
INTERNATIONAL

As always when dealing with such large subjects we find that the big statements are relatively easy but that God, or the Devil--take your choice--is found in the details. At the same time trying to spell out all the details in a master plan is, in my judgment, a time consuming and profitless enterprise. We should reach agreement on the major issues with sufficient detail to exemplify the principles, but the working out of the specifics should become the subject of explicit action plans.

I enjoyed our brief meetings in the Valley at the time of the Curry employees reunion and was very interested in you comments concerning the current state of the Park. I wish that it were possible for us to sometime discuss these issues at greater length.

Sincerely,


Stuart G Cross

COMMENTS

RESPONSES

B·I·A
INTERNATIONAL

STUART G CROSS
4413 N Summerset Loop
Tucson, AZ 85715
(602) 886 4165

A native of San Francisco, Mr. Cross attended public school in the Bay Area and continued his education at Stanford University where he received his B.A. and M.A. degrees in history and taught for four years while working towards his PhD.

While attending college, he worked summers for the Yosemite Park & Curry Co., the principal concessioner in Yosemite National Park, and eventually accepted a permanent position in Yosemite. From 1951 to 1973 he held various management positions which included involvement in all phases of the company's business, i. e. recreation, retail sales, transportation, and food, beverage and hotel operations. He managed The Ahwahnee Hotel and then directed the Hotel Division of the Company where he was responsible for twelve hotel and fifteen restaurant operations. Mr. Cross then became Executive Vice President with overall operational responsibilities, including the planning and execution of renovation and building projects. During his last five years at Yosemite he served as President, and, finally, Chairman of the Board of the Company.

During these years he worked closely with his predecessor as President, Mr Hilmer Oehlmann, on matters concerned with government relations and concession policy matters. Mr. Oehlmann throughout this time was Chairman of the Conference of National Park Concessioners, and along with Herman Hoss, Conference Attorney played a leading part in the development and legislative enactment of National Park Concession policy. Mr. Cross participated in the preparation of statements and testimony in support of policy legislation (PL 89-249), and subsequent legislation extending permissible contract length to thirty years. He was involved in various Congressional hearings regarding negative reports on concession matters and the Yosemite Park & Curry Co., in particular. He participated in the negotiations over the current Y P & C Co. thirty year contract and the preceding agreement.

In 1952 he did research and prepared a preliminary draft of a history of National Park concessions.

Mr. Cross served as Secretary, Conference of National Park Concessioners as well as Chairman (1966-1972) during the Directorships of Connie Wirth and George B Hartzog. This involved many meetings with Director, Assistant Secretary and Secretary of the Interior.

After leaving Yosemite when the company was taken over by US

B · I · A
INTERNATIONAL

Natural Resources, Mr. Cross served for one year as President of the National Park Foundation.

Subsequently he relocated to Utah becoming President of the Utah Hotel Company and Managing Director of the Hotel Utah in Salt Lake City. During these years (1973-1984) he was active in Preferred Hotels Worldwide, a marketing consortium of independent hotels in Asia, Europe and North America and served statutory terms as President and Chairman of the Board of that group.

He also continued to maintain his interest in National Park and concessions matters participating in several Conferences on National Parks sponsored by the National Parks and Conservation Association and also served on the Board of NPCA.

Since "retiring" from the Hotel Utah Mr. Cross has completed several short term operational and consulting assignments including participation as a member of a study team organized by the Pacific Area Travel Association at the request of the Tourist Authority of Thailand for a Tourist Development Study of Khao Yi National Park. That report was completed in June of last year (1989).

Presently Mr. Cross is President and Director of Brink International Associates, BIA, a firm specializing in consulting services and executive search work for the hospitality industry. He is responsible for the Tucson office, one of four offices nationwide.

COMMENTS



Consulting and Executive Search for the Hospitality Industry

22 January 1992

Report To
Tucson Office

MEMORANDUM

Comments on Draft Concession Plan, Yosemite National Park--1991

Stuart G Cross

The following comments on the Concession Services Plan are based upon Alternative B, the choice preferred by the National Park Service. In order to save space I have not usually discussed proposals with which I agree. This, of course, results in a document which may, with the omissions, seem very negative and it is true that I have strong disagreements with certain proposals, and serious questions about others. However, my remarks are intended to be critically constructive and consistent with the letter and spirit of the 1980 GMP which I strongly support. They are based, for the most part, upon my own long residence in Yosemite, my participation in the early Master Plan studies of 1968 to 1972, and my continuing concern. I recognize that I do not have all of the data and information which was available to the authors of the report and that I may consequently be in error in some of my interpretations of their recommendations and in some my suggestions.

The following discussion is in the order of presentation in the report.

CONCESSIONER HEADQUARTERS/EMPLOYEE HOUSING

Noting that this will be the subject of a separate document I must comment that the elimination of most employee housing from the Valley will impact concessioner services in many ways that should have been considered in this plan. I urge that the final draft take these important matters into account.

Specifically, a considerable amount of the concessioner's merchandising activity is more related to the desires of the residential community than to the needs of the visitor. This results in an increased volume of sales, proportionately higher and more noticeable in the off season, of sales space needed, and the kinds and variety of merchandise stocked. The visitor does not deny himself the opportunity to buy from these local offerings, and purchasing managers may see this as reflecting a real demand for necessary items, but careful consideration

RESPONSES

52a The various employee needs are considered in the draft *Yosemite Valley Housing Plan/Supplemental EIS*, along with the best location for these services to be provided.

52a

P.O. Box 704
Harris Head House, N.C. 27098
(919) 820-0890 FAX (919) 872-2630

1113 N. Sunnyside Loop
Tucson, AZ 85715
(602) 880-4163 FAX (602) 880-4271

IceWorld Plaza
800 K Street, N.W. - Suite 200
Washington, D.C. 20001
(202) 985-5333 FAX (202) 985-5334

COMMENTS

RESPONSES

B · I · A
INTERNATIONAL

will show that there would be no necessity for offering these things if the residential community did not exist.

Meals. How many meals are served daily to residents, both Y P & C Co. employees and others, is a figure which used to be readily available but may not be known now. However, it could be extrapolated from other sources, or old accounting records if they are available. As most employee housing does not have kitchen facilities, the number of employees served in the food outlets, or for whom meals have to be otherwise prepared is substantial and should be taken into account when planning new food service capacities. There is also a lesser impact, but one which has some effect on the type and quality of service, coming from Valley residents who engage in recreational dining at The Ahwahnee or The Lodge and thus create a false market. It may also be that present food service outlets provide a wider menu choice than needed by the visitor who stays for only one or two days and that this is an unconscious response to the wishes of local residents.

Beverage Service: The patronage of the existing hotel bars by employees is substantial and understandable given the restricted nature of dormitory living. Nevertheless, I believe that it results in an overstatement of demand, and changes the character of the service. To have Monday Night Football, or other televised sports events shown in a bar is a legitimate leisure time option for the employee, it is clearly an inappropriate option for the Park visitor. Similarly, other bar entertainment needs to be scrupulously monitored to be certain that it is not of a type which the visitor may enjoy with the Valley residents, but improper in the Park setting.

In short, the community has a variety of legitimate needs which the concessioner must satisfy. They are, of course, the same things which the visitor is used to finding in his home community. They are not, however, necessary to his appreciation of the Park and their presence makes the visit seem familiar rather than special. The relocation of the Valley community will create the opportunity to change this situation.

I hope that the decision to prepare two separate plans does not mean that this important question will not be considered, or that it will drop into a void left between the two proposals.

LODGING

I am opposed to the further reduction in the number of overnight rooms in the Valley. To my personal knowledge the number of units operated by the concessioner has shown no substantial increase since the 1930's (new construction since World War II has always been a replacement for existing units) and the overcrowding of the valley at certain seasons and holiday

52b Comments noted.

52b

COMMENTS

RESPONSES

B.I.A.
INTERNATIONAL

weekends, which has been a long time major planning problem, reflects both an increase in camping on the valley floor and vastly more day use visitation. Since the 1960's the campground situation has been brought under control by formalizing and designating campsites and enforcing the prohibition of out of campground tenting which was once condoned during major holiday periods. The campgrounds still take up an inordinate amount of real estate and, in some cases, impinge too greatly on the rivers but that situation is much improved. Day use ceilings have been established but may be too high. On the other hand a new transportation plan could result in increased day use with a lesser impact.

Again, the absence of an essential part of the management plan, in this case the transportation study, makes some of the recommendations in this plan suspect.

My strong feelings in recommending a limited number of modest, well planned overnight accommodations, and in favor of better located, more attractive campgrounds stems from my deep belief that the visitor's ideal Yosemite experience can be found along a broad spectrum of subjective response, stretching from the awed wonder of the traveler's first view to the intense wilderness experience recounted in the early writings of John Muir. A quick drive through, in a bus or car, along with a fast food lunch at Degnan's, provides little opportunity for the deeper experience to which the visitor is entitled. Obviously the number who can stay over must be limited and that precise number, as well as the type and location of buildings involves a somewhat subjective judgment. I would argue, however, that the historic numbers did not overcrowd the Valley prior to the increase in day use and the spread of out of control camping. Within these numbers, present and historic, constructive change and improvement is possible.

On the other hand, I do not defend the continued use of the tents at Curry--they were obsolete twenty years ago, are rented to visitors who accept them as a last resort, and were then scheduled for replacement as were the cabins without bath. I also agree with the numbers, as a valley wide total, in the the 1980's believing that such a reduction in the number of units would reduce visual congestion get out of the flood plain at Yosemite Lodge, and solve some other problems.

What about specifics? For Yosemite Lodge the proposal is excellent and appropriate. That unit is well balanced at the present ratio between lodging and meal service capacities (except as noted in the report during the winter season when more indoor seating is need), and getting out of the flood plain and removing the obsolete cabins is long overdue. I assume, but do not know, that the new units will be sited closer to the valley walls. We did study such a program many years ago and I recall it as

B.I.A.

INTERNATIONAL

being feasible, however a relocation of the main road was thought necessary and I assume that this is in the planning.

The prescription for Curry village seems to me too drastic.

I would prefer to see the total number of rooms at Curry set at 414 rather than the 365 proposed. This would keep the total number of units on the valley floor at the level of the 1980 GMP but would exchange numbers between Curry and the Lodge.

The kinds and location of the new units requires, I believe, further study. Replacing the cabins without bath is, of course, a good move but I am not sure what is contemplated by the substituted "cabins with bath", or where they will be located. Without knowing what is proposed it is hard to comment. I think, however, that the area now taken up by the cabins without bath and the nearby tents numbered from 1 to (I think) 65 and the 300 series is a good location, well located near the center of Camp. I do argue, however, for multi-unit unit one and two story structures as being less land intensive, more easily serviced, and more energy efficient than individual cabins, especially during the cold winters on the South side of the Valley.

Serious and innovative architectural thought must be applied to the design of the new units at Curry. They should be modest in cost and rent at a low rate, simple in style, and suitable for families. In, I think, 1970 the Denver Service Center did some preliminary studies which, while not without problems, I recall as meeting such criteria. Among the questions to be discussed should be the extent of the plumbing required--central showers with toilets and wash basins in the rooms is one possibility--and also whether some hostel buildings and housekeeping facilities would be appropriate.

I believe that by using multi-unit unit buildings it would be possible to site the replacements for the 80 cabins without bath, and most of the 100 tents, planned for retention but which I would replace, in this area.

More space would be needed for the additional 114 units which I would keep. The 400 and 500 tent sections are good locations, particularly the land near the present parking lot, offering good circulation to the center of camp and easily used, mostly level ground.

Should the 500 section be too near the new stables site consideration should be given to the old Camp Stoneman area, across the Bungalow section parking lot. Buildings here would be screened from the main road and readily accessible. The same considerations apply to the present ice rink location and the former garage site.

COMMENTS

RESPONSES

B.I.A.
INTERNATIONAL

Obviously we cannot re-design Curry in this memo, but if the aim is to get out of the flood plains and rock fall areas and to provide a "high quality lodging experience" designed to minimize apparent congestion and urbanization through good design and land planning I believe that Curry can be kept at a capacity of 415 units retaining the overall Valley counts of the 1980 plan.

The suggestions for the other Valley units, Housekeeping and The Ahwahnee, seem appropriate.

Common sense, confirmed by every travel trend and population projection available, tells us that the demand for visits to Yosemite Valley will continue to grow. As Valley accommodations are and must be limited, increased demand will fill them in what used to be the "off season". Substituting better, and more substantial structures for the units originally designed for summer use, will certainly not satisfy the total demand, and that is not the goal, but will still make it possible for many who could not otherwise come to the Valley to do so, and to visit during some of the most beautiful seasons. Maintaining approximately the historic lodging capacity on a year round basis seems to me proper and not threatening to the environment or degrading of the experience.

In 1904 Galen Clark wrote some advice for travelers. "A week", he wrote, "is the shortest time that should be allowed for a trip to Yosemite. Two weeks are better. The grandeur of the valley cannot be fully appreciated in a few days." Two weeks, or even one, seems hardly possible 88 years later, but we should certainly try to provide one or two nights!

With the prescriptions for the outlying units I have no comment other than to express the hope that Wawona might take a somewhat larger number.

A final comment on lodging facilities is that in the absence of a transportation plan, siting and land use decisions currently under consideration may still be too dependent upon our past and present automobile directed experience and expectations.

CONVENTION AND OTHER GROUP BUSINESS

In the Lodging section of the report the comment is made that conventions, seminars, and other group meetings would be allowed during the off season but that the "black out period" will

be extended. With occupancy rates of 94% at The Ahwahnee and 95% at Yosemite Lodge (the only units with appeal to such groups) and with no month at either hotel dropping below 73% it is impossible for me, as a professional hotel manager, to understand why the "blackout period" is not already in effect for the full twelve months. The concessioner may argue that these figures

52c

The final proposal indicates that the blackout period would be periodically reviewed and extended.

52c

COMMENTS

RESPONSES

B.I.A.
INTERNATIONAL

are misleading as they include the rooms now occupied by such groups. However, given the fact that group room reservations are always blocked out long before significant numbers of individual reservations have been made it would be presumptuous to conclude that these rooms, or at least the larger part of them would not have been taken by individual park visitors if they had been available when requested. It is well to remember that the traditional rule of thumb for a successful hotel operation is a 70% occupancy.

I recognize that NPS policy does allow for group meetings under certain conditions but my recollection is that, excepting groups that had an important Park related purpose, the policy was based more upon the economic need of the concessioner to sell rooms in the off season than upon any determination that the accommodation of conventions was a desirable or appropriate Park use. There are many hotels, resort and commercial, anxious to serve conventions, there are very few rooms available for those who wish to experience Yosemite.

May I add, anecdotally, that I have talked to many people who no longer try to visit Yosemite believing that the rooms are always sold out far in advance the year round, and also to several acquaintances who have arranged with friends who are members of convention groups to come to the meeting with them, believing that only in that way can they get rooms at the Lodge or The Ahwahnee.

Should there be a drop off in occupancy after the groups have been eliminated I am certain that a small amount of publicity, and, perhaps, informational advertising as to the availability of Yosemite reservations would quickly reverse such a trend.

FOOD SERVICE

Without access to meal counts and extended observation of mid summer visitor preferences it is difficult to challenge the assumption that additional food service is needed in the Valley and that the bulk of this should be characterized as Fast Food. I suspect, however, that the need is overstated.

My greatest concern is over the very substantial expansion of food service proposed for the Yosemite Village area. As I read the report the number of seats provided, including the deli, will increase from 614 to 770, with Degnan's becoming a very, very large operation with 620 seats. The Degnan building is ugly and little can be done to improve the exterior, while the interior is dark, stark, and uninviting. It will take considerable skill to make eating, even fast food, with 600 others a positive part of a Yosemite stay. More importantly, this increased emphasis upon feeding in the Village area will

52d Comments noted. Also see response 3d.

52d

COMMENTS

RESPONSES

B·I·A
INTERNATIONAL

only add to the congestion and confusion in what is already an unattractive and urbanized area. While a new transportation system may eliminate the parking mess, it probably will not solve the other problems.

It will be said, and probably with some justice, that this proposal is realistic and recognizes facts as they are--the store is here, the Visitor Center is here, the shops are here, Park Headquarters is here, and the buses intersect here--all of these things bring people and they must be fed. But Yosemite deserves better than this!

Certainly there will have to be food service in the Village, perhaps as much as now exists, although I certainly hope that the GMP plan which envisaged the removal of the Degnan building can be implemented. What is vitally, important, however, is to distribute the feeding throughout the Park in ways that enhance, not degrade, the visitor experience.

Assuming that the increased demand is primarily a result of increased day use, and that the present ceiling on day travel will not be reduced, however desirable I might believe that to be, and further deducing from the number of outside seats provided that this excess demand occurs primarily in the summer months, it seems to me that a major thrust towards solving this problem lies in encouraging the visitor to get out his car or shuttle bus and to picnic in the Valley. The development of modest and attractive picnic spots in both the upper and lower valley by the Park Service would be required and the sale of wrapped sandwiches, fruit, beverages, snacks and so forth by the concessioner would be encouraged. More elaborate box lunches might also be provided. Extensive publicity and promotion would initially be necessary but I believe that in a relatively short time this would become the accepted and preferred practice for many visitors. Sales of picnic supplies would, of course, take place at the hotels, the stores, and in the facilities now designated in the plan as snack bars. Additionally hotels outside the Park should develop a picnic sales business of their own and day travelers encouraged to bring their feast with them.

Promoted and encouraged by the Park Service and the concessioner such an expanded and positive program would not only relieve pressure on existing food outlets but improve the visitor experience.

How many picnic areas would be needed? For starters we might suppose a number of tables equal to the proposed increase in seating at the Village--160. Say eight areas with 20 seats each, a very modest beginning.

A second possibility for reducing congestion in the Village would be to explore more fully the potential for food service at Curry Village. The plan is not entirely clear to me, but

B.I.A.
INTERNATIONAL

as I understand it the present facilities would be somewhat rearranged but the number of seats would remain about the same--639 presently increased to 650. It is not clear as to how these figures relate to the present and proposed lodging ceilings at Curry, however some general comments may be in order.

The fact is that the present building housing the snack bar, bicycle stand, and various merchandising activities was for many years a 325 seat cafeteria which along with the 400 seat dining room (now cafeteria) and a 100 seat soda fountain and grill were all very active restaurants drawing their customers not only from Curry itself, but also from the campgrounds and day visitors. With its own grocery store, post office, and other facilities Camp Curry was the center of activity in the upper valley.

As the services plan, contemplating an expanded grocery store and more active food service, seems to be moving back in that direction I suggest that even more emphasis be placed on food service at Curry. Two things, I think, would help. One, the bicycle stand should be moved from its present location and relocated somewhere else, perhaps on the other side of the small service road in a specially built building rather than the present makeshift arrangement, or in a location near the shuttle stop wherever that is finally located. This would free the whole interior space for indoor dining supplementing the present deck. Redecoration and cleanup, along with an expanded kitchen, would be required. Second, the redo of the cafeteria to a family restaurant should go on as planned, however serious thought must be given to the entrance to Curry, the signing, and the landscaping so as to draw people into the restaurant area. The cafeteria building location is hidden from the visitor and many guests are unaware of, or unable to find the restaurant, whether it function as a family restaurant or the present cafeteria.

Some internal promotion in visitor guides will also be needed, but diversion of food customers from the Village to Curry is not only possible but highly desirable.

Finally, returning to the Village. The GMP document of 1980 proposed the removal of Degnan's building and also eliminated from the Village Store the gift, clothing and sport shops. Alternate B would retain the gift shop and add the mountaineering shop from Curry at the lower level while keeping food service in the form of a deli with 150 outside seats.

I suggest the following which retains portions of both plans and also returns the lower level space at the Store to its original use. First, take out the Degnan building as planned. Second, eliminate all merchandise sales from the lower level (this is further discussed below under Merchandising). Third

COMMENTS

RESPONSES

B. I. A.
INTERNATIONAL

return all of the lower level to its original use for food service. There were 125-150 seats in the family restaurant area and 30-40 counter seats in the present fast food area. The extensive outdoor seating was added and should be retained. Additional outdoor seating can readily be added outside the family dining room, if needed. Without trying to determine the details of the food service, or services, which would be most acceptable it is clear that a very adequate substitute for the Degnan operation is possible. Taking past and existing figures I compute 460 seats (150+40+270) replacing 322 in the present Degnan operation. Add to this an expanded Curry facility and the picnic proposal and we can meet the present perceived need and improve the whole atmosphere of the Village.

In the past I have been critical of the Snack Bars at Happy Isles and Glacier Point but now believe that they have a place in spreading mid-day food service demand. It seems to me that they should emphasize the sale of picnic foods as described above.

I have no comments regarding out of Valley food service.

ALCOHOLIC BEVERAGES

The sale of alcoholic beverages in conjunction with meal service provides no problem for me., I urge, however, that the concessioner be directed to offer simpler, and shorter wine lists featuring modestly priced domestic wines. There is no necessity for offering exotic or rare vintages, or the great variety of wines appropriate to a conventional, up scale resort. Wine and food should be wholesome and of good quality, it should not try to become an attraction. Here again the provision of typically elaborate resort hotel food and wine service sends a confusing signal to the guest and emphasizes not the difference but the conventionality of his Yosemite stay.

I am greatly disappointed by the proposal to continue the bar service "lounges" in their present form at the Lodge, Ahwahnee, and Curry Village. (I do not comment upon Wawona as I have not seen that operation in its present form.) The present Lodge bar has eliminated the lobby seating in a building which had already been corrupted by the creation of a meeting room and added merchandise space. There is a need for a "holding area" for patrons waiting to be seated in the Restaurant or Broiler, but they should not be forced into a bar and expected to buy drinks while waiting, nor should intrusive public address announcements call them to their table. This tactic is properly resented by almost all restaurant patrons, particularly those in family groups. Holding areas with and without alcoholic beverage service should be provided and the plan seems to address this with new building. It does seem, however, that restoring this fine space to its original configuration would provide

COMMENTS

RESPONSES

B. I. A.
INTERNATIONAL

a way to solve the problem with a minimum of new construction. Beyond this limited service I do not see the need of an alcoholic beverage "lounge", other than perhaps beer and wine, that is not related to food service, nor do I think that the provision of large screen sporting events in the bar adds in any positive way to the visitor experience.

The Indian Room at The Ahwanee occupies the original porte cochere which was enclosed and used as baggage room during World War II when the Navy had taken over the hotel. Converted to a bar and meeting room in 1946 it was thought necessary to help stimulate off season business--particularly skiers who wished after ski diversions and convention groups who needed a meeting room during the day and enjoyed evening drinking and dancing. These promotional activities are no longer appropriate or needed, although there still should a meal service related place where after dinner drinks can be served and waiting patrons accommodated. Ideally, this should be located near the dining room and would include some outside seating in the summer. Studies were once made for such a facility on the West Terrace and a new plan could be developed. It presents a difficult but not insuperable architectural problem. The preliminary studies may still exist in the files of either the company or the Spencer architectural firm. They were never fully developed or presented to the Park Service.

The Indian Room, if retained, should be returned to use as a meeting room and used for interpretive exhibits, but primarily as a place for naturalist talks with good audio visual facilities.

At the express wish of the Curry family there was no liquor service at Camp Curry prior to 1971. A small exception was reluctantly granted by Mary Tresidder in the 60's when she, and the Board of Directors, gave permission for liquor to be served to convention groups or private parties in the off season when the Camp was closed, and with the understanding that the event would not be visible to the general public.

While the absence of liquor service occasioned little complaint from the guests, management felt that a more liberal policy would be well received and would be profitable. So it was that after Mrs. Tresidders's death, a limited bar service, tied to meal hours was begun in the early 70's. I do not know the subsequent history but I see no justification for the present large and conspicuous bar terrace featuring, according to a blackboard still in place last November, pitchers of Margaritas at a special price. Curry Village has a particular place as an unpretentious, simple place for families and others of modest means, needs and expectations. While the proposed family restaurant might well be planned to offer, from a service bar, pre-dinner cocktails along with beer or wine to lunch and dinner

COMMENTS

RESPONSES

B · I · A
INTERNATIONAL

patrons there is no need for a conspicuous open bar.

MERCHANDISE SERVICES

In considering the extent and nature of the merchandise sales offered in the Park it is essential that an overall concept of visitor services be kept in mind. The matter is well covered in the 1980 GMP under the Management Objectives Section, pages 8 and 9. The Concessions Policy Act (PL 89-249) is also clear in stating that "public accommodations, facilities, and services as have to be provided" in the Parks "should be provided ...only under carefully controlled safeguards...so that heavy visitation will not unduly impair these values...." It further states that Congress intends that developments shall be limited to that which is necessary for public use and enjoyment and "that are consistent to the highest practicable degree with the preservation and conservation of the area."

This charge, and the GMP statement consistent with it, is clearly intended to be very restrictive by limiting development and the provision of facilities and services to that which is necessary and appropriate. Certainly the provision of modest lodging and food service meets this definition as does the sale of groceries and camping supplies. Sundries such as simple over the counter medicines, toilet articles, camera film, and some clothing such as sweat shirts, sweaters, heavy socks, hats and dark glasses are all things that the visitor may have forgotten or may need to buy during his stay. (This list is for illustration and not intended to be inclusive.) On the other hand, it is not necessary that extensive, or stylish clothing selections be offered, and even when looking at such things as groceries and camping supplies, the rule of necessity--not convenience for the visitor or profit for the concessioner--should apply. Upscale camping equipment, extensive grocery selections, or fancy foods, are not needed and should not be offered.

In Plan B the general statements concerning the type of merchandise to be offered in the souvenir shops are in the right direction and seem to visualize stores similar to those found in distinguished art and science museums--places such as the Monterey Bay Aquarium, the Arizona Sonora Desert Museum, or major galleries such as The Metropolitan in New York.

The important difference, however, is that in every case these souvenir/gift/interpretive shops are not located within the galleries or exhibit areas but are adjacent to the exit where the patron can make a meaningful choice of items which, in the words used by the concession plan, provide a means for the visitor to take something of his park experience away with him.

We do not find a souvenir shop among the Botticellis at the

52e Comments noted.

52e

COMMENTS

RESPONSES

B.I.A.
INTERNATIONAL

Uffizi, with the Goyas at the Prado, or next to the kelp forest display at the Monterey Bay Aquarium. The visitor is not encouraged or expected to spend his limited time on a shopping trip!

In an ideal Yosemite the same principal would apply and high quality gift and souvenir shops would be located where they would be available to visitors as they left the Park. With a new transportation system the logical location would be where they left the shuttle to retrieve their car. Interpretive materials useful during their stay would continue to be available in the camp stores, the Village, and in hotels and would include such things as guidebooks, historical and natural history literature, and other background publications. Postcards, art reproductions, and similar items taking up small space and not conducive to extended shopping might also be sold.

Until such time as a transportation plan is unveiled and implemented some souvenir sales may continue in the Valley. Without trying to spell out the exact use to be made of the present buildings, I strongly contend that a thoughtful application of these guiding principles and suggestions-particularly the relocation of and reduced emphasis upon souvenir stands--can result in a greater reduction of merchandise space than the present goal of 25%.

This, in turn, would make available food service areas in the Village Store as earlier described. It would also permit the removal of the Degnan building.

I add, that applying the same guidelines, I see no reason to relocate or continue the "temporary" souvenir stand at Glacier Point.

So far as packaged alcoholic beverages are concerned I would be agreeable to their continued sale in the grocery stores but would discontinue sale at the Lodge Gift Shop and the three other locations listed. Shelf space, however, is at a premium in all of the grocery stores and the extent and variety of the liquor available should be reduced. Not only is this a matter of practical merchandising for Yosemite, recognizing a hierarchy of necessities, but also large displays of liquor such as presently in the Village Store, again seem to emphasize the wrong things.

VISITOR ACTIVITIES

Although the reference to the continuation of Alpine skiing facilities is consistent with the 1980 GMP I believe this question should be further reviewed. There are many, excellent and more prestigious downhill ski areas available elsewhere and no logical need to continue it in Yosemite. Nordic skiing,

52f See response 32f.

52f

COMMENTS

RESPONSES

B.I.A.
INTERNATIONAL

on the other hand, ski touring, is a particularly appropriate Park use and should be encouraged. Perhaps an interim step, satisfactory to those who advocate the continued use of Badger Pass would be to retain the present lifts, but do away with snow grooming, trail clearing and landscaping, eliminate the ski school, and encourage a more old fashioned and traditional use of the area. Ski school personnel would find new roles as cross country or touring guides and long neglected trails--Strawberry, Rail Creek, Bishop Creek, Grouse Creek, Inspiration Point, Chinguapin, Glacier Point and Ostrander-if not too overgrown--could be reopened.

Expansion of the shuttle bus system is a necessity.

Removing the stable to the "Curry Dump" area (Mary Tresidder would sometimes smile quietly as she wished that it more correctly be designated as the "Park Service Dump at Camp Curry") seems ok. My only environmental concern is that it not intrude upon, or further diminish the lovely swamp to the East of that site which used to be home to a wonderful variety of flowers, bird, and animal life. Its attractiveness was diminished by the expansion of the Happy Isles parking area, and while I have not seen it in recent years, it should be protected, and, if necessary, restored.

There should also be discussion of the size of the horse parties in the Valley. The large strings and limitation of horse rental to two hour guided rides came about because of the large number of expensive liability suits filed by unskilled riders who fell from these "vicious and unruly" beasts. That it proved more profitable was an additional benefit to the company.

The size of the parties and their management may have been modified since my time in the Valley, and this will no doubt have brought about an improvement. However, I suspect that more could be done to improve this experience, while still acknowledging the problems of safety and liability.

Specifically, I would establish a ceiling for the number of total daily rides and distribute this number between the most popular two hour rides and reinstituted half day and all day guided rentals. A ceiling upon the number of two hour rides would reduce the size of these parties and encourage the longer rides, which would make better use of the existing bridle paths, particularly those in the lower Valley. Labor costs--more guides--would be increased but the rider's experience vastly enhanced. The All Day ride would stop for a picnic lunch, and in all cases the smaller parties would provide better opportunities for contemplative viewing and interpretation.

I hold no brief for the Crane Flat proposal, and have an open, but negatively prejudiced mind on the subject of river rafting

52g See response 24u.

52g

COMMENTS

RESPONSES

B · I · A
INTERNATIONAL

in the Valley.

52h

I advocate the removal of the tennis and golf facilities at Wawona for obvious reasons. While Wawona is in some ways a traditional resort hotel, it is within the Park and should conform to Park standards. Those who want resort activities can find better and more modern ones elsewhere.

I am not too troubled by the presence of the hotel swimming pools and admit the inconsistency of my thinking on this point. I do not take a strong stand for either their retention or removal.

OTHER VISITOR SUPPORT SERVICES

In general I agree with most of the comments under this heading. Many items are minor operational details which should be solved on the ground by the Superintendent and concessioner.

I do have concern over retention of the Concessioner Warehouse building and support the original GMP proposal. If some space is needed for in Valley administrative support activities of the concessioner they could be placed in a portion of the present company building which is a modest and unobtrusive structure.

Other, present warehouse building activities should go to El Portal or in Park Service areas as proposed in the 1980 GMP.

Project priorities and implementation schedules need to be spelled out and further developed in cooperation with the concessioner selected. I agree with the general list of "high priorities" but would add that there are a number of operational decisions which can be made, consistent with the plan, and which will quickly establish the commitment of the Park Service and the Concessioner to constructive change in Yosemite. A number are noted explicitly above, and others are implicit in the overall goals.

Financing presents a serious problem and there is not enough information to make possible extended comment. While much funding may come from the concessioner too much reliance upon concessioner profits as a source could lead to the same kind of pressure for economic success that many believe corrupts the present concession system. The fact that profits generated go for good works, will not excuse an operation that puts monetary success above guest service contributory to the Park experience.

A tax upon visitor purchases, as now collected to fund the shuttle bus, would offer a way to supplement government appropriations and concessioner profits and speed up implementation.

52h See response 32b.

COMMENTS

RESPONSES

B·I·A
INTERNATIONAL

15

In any case a grand effort will have to be made to gain supoport among the general public and within the government for the overall plan and its early implementation. The time will be long, and experience will undoubtedly dictate changes that cannot be foreseen, but an overall plan, including transportation and a new administrative and housing site, for a better Yosemite must be pulled together, presented, approved and a start made. The Concession Service Plan is only a part, but the part most immediately noticed by the public, and the part that must be begun next year.

COMMENTS

RESPONSES



HOTEL MANAGEMENT • REAL ESTATE DEVELOPMENT

Terminal Tower • Suite 700 • 50 Public Square • Cleveland, Ohio 44113-2268 • 216/241-6375 • FAX 216/241-1329

January 23, 1992

Superintendent
Yosemite National Park
P. O. Box 577
Yosemite National Park, CA 95389

Re: Draft Concession Services Plan/
Supplemental Environmental Impact Statement
Yosemite National Park

Dear Sir:

We represent the owners and operators of Marriott's Tenaya Lodge in Fish Camp, California. Therefore, our position on the Plan is grounded in our experience as hospitality and tourism professionals.

Our comments must be prefaced with an opinion about the Park and its relationship to the people: "Yosemite must accommodate people" – Superintendent John Moorehead. At the heart of all these issues is the former superintendent's statement that the Park should serve its owners, the American public. Too many proposals are floating about that would highly restrict access of the very people for whom this Park should exist. As you review input for this important step in the development process of Yosemite's future, always keep in mind the public's right to enjoy and experience this great treasure.

We believe that there are two primary conditions for which we can provide studied observation: LODGING and TRANSPORTATION.

With respect to the 1980 General Management Plan, you must consider that the Plan that was published in 1980 was ten years in the making. The world is a different place today. The demographics of the visiting population are different; the mix of visitors is different; and certainly the volume of visitors is vastly different. Yosemite must be

Letter 53

COMMENTS

RESPONSES

Superintendent, Yosemite National Park
Re: Draft Concession Services Plan/
Environmental Impact Statement
Yosemite National Park

January 23, 1992
Page 2

viewed in the context of regional impact, not confined within the borders of the National Park.

53a

While all of the other environmental and economic considerations would undoubtedly benefit from this consideration, lodging and transportation are fundamentally involved on a regional basis when dealing with a Park assessment. Our concern is that this plan may fall short in considering the regional implications.

TRANSPORTATION

We participated in the 1990 Wilderness Society Transportation Workshop, and it focused intensely on the shortcomings of the Park and the surrounding communities. As operators of the premiere Yosemite resort, our guests' number one requirement would be met by providing an inter-park transportation system, which they could access at the South Gate. Buses are proposed to operate full-time to the Wawona Hotel, and to us, it seems foolish to service a small lodge inside the Park and yet ignore a 250-room resort facility just two miles outside the Park border and only eight miles from Wawona. Our guests will willingly leave their automobiles to ride public transportation.

Beyond the inter-park transportation requirements, the community-wide transportation loop needs to be expedited so that staff and tourists alike can travel from Mariposa to Oakhurst to Fish Camp to the Valley floor and back to Mariposa in a continuous loop. When in place, such a system would alleviate the need for some employee housing and many passenger trips by private automobile.

We recognize that the Plan in review does not address transportation needs, but as this concession contract is crafted, do not miss the opportunity to consider the role the concessionaire must play in welcoming outside clientele from "competing" hotel properties versus treating the public from these establishments as adversaries and inhibiting smooth transportation for all.

LODGING

The Marriott Hotel was built with private funds at a cost near \$45 million. This investment was made because we saw the need to move lodging from the Valley to the peripheral communities. We were encouraged that future decreases in lodging

53a See response 18b.

COMMENTS

RESPONSES

Superintendent, Yosemite National Park
Re: Draft Concession Services Plan/
Environmental Impact Statement
Yosemite National Park

January 23, 1992
Page 3

would occur based upon the recommendations of the 1980 General Management Plan. The free enterprise system will fill the need for lodging outside the Park.

- * The Marriott Hotel ran 80% occupancy in 1991. There remained over 35,000 unsold room nights in that facility.
- * The Marriott sold rooms from as low as \$49.00 in 1991.

These facts suggest that additional Park lodging may not be necessary at this time.

The National Park Service should consider requiring a regional approach to housing inquiries. Currently, our hotel is unable to access unaccommodated guests who call into the Yosemite Lodging System when rooms are unavailable inside the Park. A spirit of regional cooperation will provide people with a better Yosemite experience, allow the local economies to capture the tourist dollar and tax revenues, and will help disperse the density to the outlying hotels.

53b

We think the Park Service should more strongly consider the impact that these new housing units would have on the Valley, in that the type of lodging proposed would require higher levels of guest service than some of those being removed, by way of management, staff attention, laundry requirement and water usage.

- * Remember that the increases in day use would suggest a need for fewer lodging units in the Park.

The convention seminar guidelines are currently not now enforced in the Park; yet, these visitors should have the right to enjoy the Sierras as well as individual transient customers. Again, we would like to encourage a cooperative, coordinated effort for receiving inquiries and dispersing them to the facilities that are best able to handle them.

53c

The Wawona Hotel addition seems inappropriate in light of the acknowledged water problem.

Our and our guests' experiences in the Park would support the modifications to the Food Service Plan as indicated.

53b

As was stated in the draft document, lodging would be decreased. Partly because of the decrease in lodging, a negligible effect in the items mentioned would be noted. Water use is addressed in the text of this document and in an appendix.

53c

See responses 32f and 7g.

COMMENTS

RESPONSES

Superintendent, Yosemite National Park
Re: Draft Concession Services Plan/
Environmental Impact Statement
Yosemite National Park

January 23, 1992
Page 4


53d

We would hope that the National Park Service would consider full ADA compliance in all new facilities.

The Yosemite experience has endured for 100 years, part of that experience is in the existing lodging product. The Park must be sensitive to the prospect of overbuilding to the public requirements.

Thank you for your consideration of these comments. Should you have any questions or desire any further information, please do not hesitate to contact me at Boykin Management Company (215/241-6375) or David Norbut, General Manager of Marriott's Tenaya Lodge at Yosemite (209/683-6555).

Sincerely,



Robert W. Boykin
President

RWB:rk

53d See response 24bb.

COMMENTS

RESPONSES

El Portal Child Development Center
717 Riverview Lane
P.O. Box 183
El Portal, CA 95318

February 28, 1992

Michael V. Finley
Superintendent
National Park Service
P. O. Box 577
Yosemite, CA 95389

Dear Mr. Finley:

We, the Board of Directors of the El Portal Child Development Center, feel that financial support, of child care facilities in the community, should be included as a line item in the upcoming concessioner contract. We do not feel that the future concessioner will voluntarily continue to provide this support.

The county has informed us that they have no intention of providing funding to support operational costs. The monies they provide are for start-up costs alone, and those monies are decreasing each year.

Due to the current economy, the demand for women to enter the work force is greater, thus causing an increase in the demand for quality child care services.

What we wish to propose, is a set dollar amount per child enrolled in each of the centers, on a quarterly basis.

Thank you for your continued support of the centers and we hope that you will seriously consider this urgent plea.

Sincerely,
Board of Directors
El Portal Development Center

Kimberly Stewart, Secretary
(209) 379-2470

54a

Letter 54

54a The issue of child care is beyond the scope of this plan; however, the National Park Service recognizes the need for this service, and it will be considered in the concessioner operations plan.

COMMENTS

RESPONSES

February 3, 1992

Superintendent Michael V. Finley
National Park Service
P.O. Box 577
Yosemite National Park, CA 95389

Re: Concession Services Plan
Environmental Impact Statement
Yosemite National Park
Draft Plan (Dec. 1991)

Dear Mr. Finley:

I would like to thank the National Park Service for allowing the public the opportunity to review and comment on the content of this Concession Services Plan. I attended the public meeting at USC on January 29, 1992. I was pleased to witness that although there was a mix of reactions concerning the management of Yosemite's next concessions contract, there was no support for the draft concessions service plan as proposed by the National Park Service. We all hope that you will give serious attention to the comments that you received and that you will take the time to correct this document in order to reflect the will of the American public.

I have three issues that I want to address.

55a

Alternative B will increase congestion in the Valley as compared with Alternative A because the all weather accommodations have a higher occupancy rate occupancy by an average of 100 rooms per night which could house as many as 400 additional people.

The 1989 Superintendent's Annual Report raises environmental issues that need to be addressed by this CSP.

The report states that "A 300-gallon sewage overflow upstream from Stoneman Bridge closed the river to the public". It also states that "Widespread failure of leach fields results in excessive pumping of septic tanks to keep areas open."

55b

The CSP does not address the environmental impact of upgrading the infrastructure to expand the services in order to accommodate the proposed development of additional rooms with baths.

Architecture
Planning
Interior Design

Orange County
Los Angeles
San Diego
Sacramento

One Venture
Suite 300
Irvine, CA 92718
Fax 714.753.9648
714.753.9007

Letter 55

55a Decreasing the total number of accommodations decreases overall density, but some seasonal densities could rise slightly over existing levels. Also see 31b.

55b See response 53b.

COMMENTS

RESPONSES

Superintendent Michael V. Finley
February 3, 1992
Page Two

55c

Incorporate the GMP housing and transportation requirements, to relocate nonessential employees out of the park and to expand the shuttle bus system to El Portal.

According to the 1990 Superintendent's Annual Report, "Director James Ridenour visited the park on August 7-8 to announce \$40 million for the El Portal maintenance/warehouse complex." Apparently this funding has been reduced to approximately six million dollars. This facility has not been addressed by the CSP. This complex would eliminate the need to maintain existing facilities by NPS and the concessioner.

The Leigh, Scott and Cleary Transportation Study of 1991 suggests that El Portal would be the most rational location for housing 650 nonessential employees for the concessioner. This location could serve as a park and ride stop for an additional 259 concessioner employees that live in the Mariposa area.

55d

The next concessions contract is the only feasible means for achieving the goals of the 1980 GMP. This contract must include obligations specifying the dates for completing all action items.

The GMP was intended to be implemented in ten years. Subsequent to that time at least five transportation reports and three GMP comprehensive designs have been produced by the National Park Service and its consultants. The time for study and preparation of Environmental Impact Statements is complete. The time for action is now.


If the next concessioner is selected on the basis of this draft document without specific contractual dates of compliance for incorporating the goals of the GMP, then they will not be resolved in the life of this contract and we will all be here fifteen years from now talking about the same issues.

As John Muir once said:

... I had a lot of these trees, saved them from drought, disease and avalanches, and a thousand straining, leveling tempests and floods, but he cannot save them from fools- Only Uncle Sam can do that.

Please help protect Yosemite for the enjoyment of future generations.

Sincerely,


David Converse AIA
Associate
Environmental Committee, LPA Architects

W00022-41
000001

LPA

55c See response 18a.

55d See response 1b.

COMMENTS

RESPONSES

Navajo Arts and Crafts Enterprise
P. O. DRAWER A
WINDOW ROCK, ARIZONA 86515
"A Tribally Owned and Operated Enterprise"
PHONE: (602)871-4095



February 26, 1992

SUPERINTENDENT
Yosemite National Park
P. O. Box 577
Yosemite National Park, CA 95389

**RE: Proposed Policy Change Concerning the Sale of Indian Arts
& Crafts at Yosemite National Park**

Dear Sir:

Information concerning the above policy change was provided to me by the Indian Arts & Crafts Association of which Navajo Arts & Crafts Enterprise (NACE) is a member. On behalf of the Board of Directors, NACE management and craftspeople, I would like to register a complaint about this apparent lack of interest on the part of the Park Service in seeking the comments of those craftspeople and organizations with a legitimate interest in these proceedings. The Navajo Nation extends into New Mexico, Arizona, and Utah and within the Nation Nation, thousands of craftspeople work producing genuine handcrafted arts and crafts who, in turn, sell on the open market and to wholesalers who have a larger market for Native American arts and crafts. If the change in policy is adopted, it will have severe impact on our craftspeople in an already economically depressed area of the Navajo Nation.

NACE certainly feels that the Park Service, as a government agency, should be responsive to the voice of those most affected by their policy and should reconsider the plan and its effects at the very least, seek the counsel of Native American communities which already suffers great economic hardship and to delay the implementation of this policy until such time the people most directly affected by this policy have an opportunity to speak.

Sincerely,

Raymond R. Smith

Raymond R. Smith
General Manager

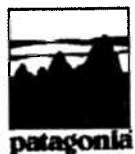
cc: John Kyl
John McCain
NACE Board Chairman

Telefaxed 02/25/92

Letter 56

56a See response 6a.

56a



January 10, 1992

Superintendent Mike Finley
Yosemite National Park
Box 577
Yosemite, CA 95389

Dear Superintendent Finley,

People at Patagonia have intimately absorbed Yosemite's beauty for 40 years. We've done first ascents of its granite walls, traveled by foot across its backcountry and skied its rugged peaks in the solitude of winter.

With each passing year, we're increasingly angry over the continued development and ruin of its resources.

If we had our way, we'd strip the valley of all its buildings. We'd take out all the swimming pools, big screen TV's, and hotel rooms. We'd disallow conventions, music festivals, and all motorized vehicles. We'd take out the roads, the concession stands, video games, tennis courts, rv sites and the jail. We'd tear down Hetch Hetchy. We'd do nothing to disturb its grandeur.

There would be no need to create activities to "enhance the visitors' experience" as the concession plan calls for. There would only be Yosemite. Yosemite. The valley itself that inspired Abraham Lincoln to protect it as a national treasure back in 1864.

Maybe someday this will happen. Maybe someday the noise, the pollution and the frenzy will be eliminated. That's not today though. Not by a long shot. Right now, we can't get what we want. But we can make some demands on the Park Service to manage the resource effectively and with the resource truly as the top priority.

Letter 57

COMMENTS

RESPONSES

Here are a few of our recommendations:

57a

1. Restore the major elements of the 1980 General Management Plan versus implement Alternative B.

- a. No new motel units
- b. Tear down the Degnan's building
- c. Remove the concessions warehouse
- d. Commit to moving employee housing outside of the park to El Portal.

57b

2. Commit to implementing the 1980 General Management Plan by the year 2000. The current Concession Services Plan has no time table. This is unacceptable. Since the inception of the 1980 plan, more than a decade ago, very little - if anything - has been accomplished. The problems, in fact, are worse.

3. In the selection of a concessionaire, every consideration must be given to an organization that can best enhance the visitors NATURAL experience and preserve the park - at the very least - from further development.

We urge you to hear our words. We use this park. And we can't bear to see what has happened to it. We're asking you to do everything within your power to restore it to its pure and natural state.

With concern for the park,
Yvon Chouinard and employees of Patagonia

Yvon Chouinard
Chris McDermott
Karen Palone
Ed Schott
Mary Martin
Paul Tabor
Andy Carlson
Maggie McGraw
Tom Sweeney
Jane Liebert
Vanessa Hill
Katie Sweeney
Ana Valdez
Paul Sweeney
Dorothy Sweeney
Kip Sweeney
Jim Sweeney
Liz Sweeney
Will Sweeney
Manda Sweeney
Diane Sherman

57a See response 1a.

57b See response 1b.

ROBERT E. LEWIS
Governor
PESANCIO LASILOO
Lt. Governor
JOSEPH DESHTA
Hd. Counsellor
VAL R. PANTEAH, SR.
Counsellor

PUEBLO OF ZUNI

P. O. BOX 338
ZUNI, NEW MEXICO 87327



505-782-4481

February 20, 1992

EDISON R. WATO, SR.
Councilman
AUGUSTINE A. PANTEAH
Councilman
CHARLOTTE T. BRADLEY
Councilwoman
OWEN R. BOBELU
Councilman

In reply refer to:

Mike Finley, Superintendent
Yosemite National Park
P.O. Box 577
Yosemite National Park, California 95389

Dear Superintendent:

This is in response to the draft "Concession Services Plan Environmental Impact Statement" of December, 1991, and to provide comment for consideration before you draft the "Final Environmental Impact Statement for the General Management Plan (GMP)".

After reviewing the December, 1991, draft supplemental document, we are very much concerned with the section on Merchandise Services beginning on page 12. The proposed changes in the GMP pertaining to the sale of merchandise at Yosemite National Park is viewed by Zuni as unfair and discriminatory against craftsmen and artists from Zuni whose handicrafts and jewelry are currently being sold at Yosemite. The Indian gift shop at Yosemite Lodge which currently sells southwestern items provides an important outlet for Zuni craftsmen who will be economically hurt should you ban the sale of their goods. While we agree that products from regional Indians should be sold and other items of environmental educational value, we do not believe that Zuni products should be eliminated from the inventory available to the public.

Yosemite National Park is an environmental treasure known to and respected by all Native Americans. The Zuni Tribe has had a history of trade from Canada to Central America and should continue to be able to sell our products along with other Indian handicrafts at Yosemite. If Zuni products are ban from Yosemite, many Zuni families will suffer a loss of income.

Letter 58

58a See response 6a.

58a

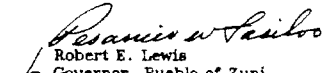
COMMENTS

RESPONSES

Mike Finley, Superintendent
February 20, 1992
Page 2

We urge you to reconsider any action that will radically change the access of Zuni craftsmen to the Yosemite concessions trade. If you have any questions, please contact Carol Pinto, Tribal Administrator, or Rod Waller, Economic Development Specialist at (505) 782-4481. Thank you for your attention to this matter.

Sincerely,


Robert E. Lewis
Governor, Pueblo of Zuni

cc: Secretary Manual Lujan
U.S. Department of Interior

COMMENTS

RESPONSES

LAW OFFICES

TANSEY, ROSEBROUGH, GERDING & STROTHER, P.C.

621 WEST ARRINGTON
FARMINGTON, NEW MEXICO 87401
TELEPHONE (505) 325-1801

February 27, 1992

OF COUNSEL
Charles M. Tansey

Douglas A. Echols
Richard L. Gerding
Constance R. Martin
Michael T. O'Loughlin
James B. Payne
Tommy Roberts
Harold D. Rosebrough
Robert D. Strother
Kurt L. Townsend

TELECOPIER:
(505) 325-4675

Mailing Address:
P. O. Box 1020
Farmington, N.M. 87499

Superintendent
National Park Service
Administration Building
Yosemite Valley, CA 95389

Gentlemen:

This office represents the United Indian Traders Association and is writing on its behalf.

The United Indian Traders Association is a non-profit corporation. One of the purposes of the corporation is to promote, perpetuate, encourage and protect the manufacture and sale of genuine Indian handmade arts and crafts and to further promote the welfare of Indians within the United States of America.

It has recently come to the attention of the Association that the Yosemite National Park has drafted a plan to supplement the 1980 General Management Plan and the 1980 Environmental Impact Statement for Yosemite National Park, California. You have solicited comments on the draft plan/draft supplement to the final Environmental Impact Statement. The United Indian Traders Association would submit the following comments for your consideration.

As you are aware, the Department of Interior has broad responsibilities among which are the management of the national parks through the National Park Service, and the management of all Indian affairs and all matters arising out of Indian relations. There is a historical and traditional relationship between the Indian people of America and the lands set aside by the government as National Parks. The natives of this land enjoyed, used and preserved the natural beauty and resources of those lands long before our country was established. The association between these lands and the Native Americans has continued over the history of our country.

When one visits a National Park, he or she generally associates the lands within the Park to the history and culture of the Native Americans of this country. Indeed, one

Letter 59

COMMENTS

RESPONSES

Superintendent
National Park Service
February 27, 1992
Page 2

of the purposes of the National Park system is to educate our citizens about the cultures of the earliest Americans and to preserve the landscape so that all may enjoy it as it was when only the Native Americans possessed the land.

Because the Park System is a National Park System and not a local or regional system and because of the long history of association between the Park System and Native Americans, it is contrary to the mission and purpose of the National Park System and the duties and responsibilities of the Department of Interior to restrict the sale of Indian arts and crafts to only those produced in the local or regional area. Native American products, regardless of where produced, should have access to the National Park shops and stores.

If Yosemite National Park restricts the sale of Native American goods to those produced locally or regionally, it would set a dangerous precedent for all other parks to follow. It is not difficult to envision limitations being made by other Parks in other states so that there is regional or local protectionism.

To convert the gift shop at Yosemite Lodge to an environmental shop of products of an environmental educational value is not well reasoned. While the United Indian Traders Association is not opposed to educating the public concerning environmental issues, converting the gift shop at Yosemite Lodge or other gift shops within the Park tends to minimize the educational value of the Indian arts and crafts. Native Americans and their values towards preserving and protecting the land and environment have long been an example to others. The use of natural resources in the products made by Native Americans helps to emphasize rather than detract from the wise stewardship by all of our land and environment.

It is the opinion of the United Indian Traders Association that Indian arts and crafts in the Southwest constitute a significant contribution to the overall variety of Indian arts and crafts available.

Concessionaires know what goods or products are in demand by visitors and will act accordingly in presenting such goods to the public. Arbitrarily limiting those goods to ones produced within a certain locality is not in keeping with the best interests of the Park Service nor is it in keeping with the intent of federal law. Federal law provides for the

59a See response 6a.

COMMENTS

RESPONSES

Superintendent
National Park Service
February 27, 1992
Page 3

Department of Interior to exercise its authority consistent with the concessionaire having a reasonable opportunity to realize a profit on his operation as a whole commensurate with the capital investment and the obligations assumed. The franchise fees collected by the Park Service, and consequently the fees available to the Park Service for maintenance of the facilities, will be greater if concessionaires are granted the right to sell those products which are in demand by visitors.

The United Indian Traders Association hereby protests the intended discontinuation of the sale of Indian arts and crafts from the Southwestern part of the country within the Yosemite National Park. The United Indian Traders Association does further protest the limitation on sale of handicraft items to local or regional Indian craftsmen only. Precluding handicraft items from other regions of the United States constitutes an unfair discrimination or trade practice on the part of the National Park Service.

Sincerely,

UNITED INDIAN TRADERS ASSOCIATION



By: James B. Payne, Secretary

JBP/on

cc: National Park Service
12795 West Alameda Parkway
Lakewood, CO 80228

COMMENTS

RESPONSES

YOSEMITE VALLEY RAILROAD CO

PO Box 1015
MARIPOSA, CA 95338
(209) 376-2403

1-30-92

Yosemite Park Committee

Honorable Members,

Thank you for giving me the opportunity to write and comment on this issue of the revised plan from the 1980 G.M.P.

I basically support the Yosemite Restoration Trusts position (excluding a couple of points) of their proposed actions of staying with the 1980 G.M.P.

My concern is that no viable camping facilities, housing, additional motel rooms or concession issues can fully be addressed until the Transportation issue is resolved. It will be a part in the issue you are addressing today. Especially if our plan of rebuilding the Yosemite Valley Railroad up the Merced River is implemented. Most buildings, housing, concession buildings Etc. could be located in Mariposa, Coulterville, Bear Valley and Hornitos and commute by train. With Merced County's interest of having the main train station at Castle Air Base in the future, this could indeed have a effect on today's issues.

Sincerely,



Ted Hogan, President
Y.V.R.R. CO

Letter 60

60a See responses 2b and 18a.

60a

COMMENTS

RESPONSES

YOSEMITE WEST - An 800 - Acre Resort Residential Community Adjacent Yosemite National Park

P.O. Box 6232
San Jose, CA 95150

January 9, 1992

Superintendent Michael Finley
Yosemite National Park
P. O. Box 577
Yosemite, CA 95389

Dear Mr. Finley,

I have reviewed the reports of the Yosemite Park Management Plan as recently released. I agree that certain commercial properties within the valley should be altered and reduced as planned, however, many of the goals expressed by the Yosemite Management Plan of 1980 are not included in the current version of the plans for Yosemite National Park. I found no mention of any reduction in day use parking which I feel was an important part of the Management Plan. There is no mention of reducing park and Curry Company residential housing in Yosemite Valley and I feel that this would be a very desirable goal. There was no mention of removing overnight accommodations to the periphery of the park or a significant reduction of accommodations within the valley itself. I believe these are all important considerations for the future of Yosemite National Park.

I again want to identify our property as a logical site to allow implementation of that 1980 general Management Plan. As I have stated before, we can provide an adequate area for day use parking with shuttle service to the valley allowing for the total removal of all day use parking in the valley itself. We can provide space for park service and Curry Company employees allowing the removal of most of the housing needs for those employees in the valley. While there was a reduction in the rustic tent cabins and cabins, the Plan calls for additional motel style accommodations. I believe those kinds of accommodations would be better placed on the periphery of the park as recommended in the 1980 Management Plan. We have a suitable site for such accommodations only 11 miles from Yosemite Lodge and with the use of shuttles from our property to the valley we can greatly reduce automobile traffic in the valley.

Pg 1 of 2

Letter 61

61a See responses 18a.

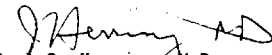
61a

COMMENTS

I plan to prepare a written comment to be presented at the public meetings that are scheduled in late January. I would like for you to send me a copy of the Yosemite Concessions Service Plan and a Statement of Requirements for Concessionaires. Because of Yosemite West's unique location we are probably going to be a significant part of the future of Yosemite National Park.

I feel you have the opportunity to establish a long term solution to many of the problems that exist in Yosemite Valley. An opportunity to decongest the valley and at the same time provide for future visitors to enjoy the wonders of Yosemite National Park. I would be happy to discuss some of my thoughts on the above issues with you directly if you have the time, either in person or by telephone.

Sincerely,


Jack D. Herring, M.D.
President, Yosemite West

JH:lp

pg 2 of 2

RESPONSES

COMMENTS

February 25, 1992

Michael Finley, Superintendent
Yosemite National Park
P.O. Box 577
Yosemite National Park, CA 95389

RE: Draft Concession Services Plan

Dear Superintendent Finley:

We want you to know that I am very much in agreement with almost all of the proposals set forth in Alternative B of the Draft Concession Services Plan.

I am a Sierra Club member, a Life Member of the Yosemite Association, I attended the Yosemite Institute with my school in February, 1973, and was employed by the Yosemite Park and Curry Company when, in the summer of 1973, it was acquired by MCA. I also attended public hearings and, using the Draft General Management Plan "workbook", contributed my own ideas on how the Park should be managed. I also attended the public meeting last January 29 in Los Angeles. I'm familiar with the issues.

I feel that Alternative B is not only compatible with the letter and the spirit of the 1980 Plan, but a significant improvement over Alternative A, because it mandates greater reductions in the number of accommodations, both in the Valley and Park-wide. I also agree with the proposals in Alternative B regarding:

- . Continued use of the Degnan's building exclusively for food service;
- . The twofold mission of the souvenir shops and the specific themes for some shops;
- . Continuation and expansion of shuttle bus service between the Valley, Wawona and Tuolumne Meadows. This is essential if accommodations at Wawona are to be increased.

The only objection I have with the plan is the total elimination of "cabins without bath" at Yosemite Lodge and Curry Village. I would like this level of accommodation retained because it provides a low-cost, year-round lodging alternative that fulfills the "full range" criterion of the GMP. Tent cabins are not the same as "cabins without bath", and should not be treated as such in

RESPONSES

Letter 62

- 62 This is a representative sample of letters received that favored alternative B.

COMMENTS

RESPONSES

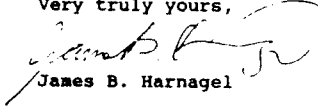
Alternative B.

Keeping the "cabins without bath" would allow folks who usually stay at Housekeeping Camp, or in the Curry Village tent cabins--most often, during the warm, busy season--to visit the park in the colder off-season. This would help mitigate congestion during peak visitation times and provide a better park experience for those visitors.

Again, this is the only negative that I have with Alternative B--and it is a rather minor one.

I wish to applaud you on a well-considered, thoughtful, and thorough job on the Draft Concession Services Plan. I enthusiastically endorse Alternative B.

Very truly yours,



James B. Harnagel

634 E. California Blvd. #1
Pasadena, CA 91106-3860

COMMENTS

RESPONSES

February 6, 1992

Secretary of Interior Manuel Lujan
18th and C Streets NW
Washington, DC 20514

Honorable Mr. Secretary:

I am writing to you on behalf of my wife and myself to express our concern over some of the items in the draft of the Concession Services Plan for Yosemite National Park here in California.

We were unable to attend any of the public meetings regarding this plan, though we wish we had been able to. We wish to register some of our feelings on the issues being examined. The most important of these include:

1. We strongly oppose the Plan's features regarding "fast food" in the Park. We see no reason to allow any of this type of business in the Park.
2. The Plan does not go at all far enough toward reducing other commercial activity within Yosemite.
3. We strongly favor a more aggressive effort to comply fully with the 1980 General Management Plan.

Our view is that the majority of concerned Americans, especially here in California, have clearly indicated similar interests with regard to the future of Yosemite. We trust that you also will agree to implement a Concession Plan which returns to the Park Service's goal of preserving the natural beauty of Yosemite for future generations. The preservation of commerce should be the concern of the Department of the Treasury and the Federal Reserve.

Sincerely,

Edward and Mary Newton-Ballman

Edward and Mary Newton-Ballman
1114 Garden Street #14
Santa Barbara, CA 93101

cc: Superintendent, Yosemite National Park

Letter 63

- 63 This is a representative sample of letters received that favored alternative A.

APPENDIX A: DEVELOPED AREA CONCESSION-RELATED GOALS

The following information does not include employee housing in Yosemite Valley, which will be considered in the *Yosemite Valley Housing Plan*. These items are quoted or paraphrased from the General Management Plan: Visitor Use/Park Operations/Development (NPS 1980).

YOSEMITE VILLAGE

Provide minimal food and banking services.

Phase out other facilities and activities that are not directly related to resource enjoyment or that exceed visitor demand.

Remove nonessential functions and facilities from Yosemite Valley.

Retain functions and facilities that are essential to the operation of the district: maintenance for Valley facilities, emergency medical care . . .

Consolidate essential functions of YP&CC.

YOSEMITE LODGE

Provide year-round visitor accommodations.

Provide food, gas, and gift sales services.

Remove facilities from flood hazard areas to avoid personal injury and recurrent structural damage.

CURRY VILLAGE

Provide several types of accommodations, primarily in the low-cost range.

Reduce the density of tent-cabins.

Provide facilities and services consistent with the historical setting of Curry Village and the natural and scenic resources of Yosemite Valley.

Remove facilities from geologically hazardous areas to avoid personal injury and structural damage.

HOUSEKEEPING CAMP

Redesign Housekeeping Camp to reduce congestion, and move facilities away from riverbank.

AHWAHNEE HOTEL

Retain the traditional Ahwahnee character and level of service, but remove outdoor activities which are not directly related to the natural resource.

OTHER VALLEY AREAS

Reduce congestion and automobile activity in Yosemite Valley.

Retain resource-related visitor activities.

EL PORTAL

Provide orientation and information/reservation system for overnight accommodations.

Provide a variety of commercial services for visitors and residents.

Create a model community for parkwide management functions, services. . . .

BADGER PASS

Provide opportunities for family-oriented downhill skiing and other forms of winter recreation with existing facilities and capacities.

Alleviate congestion and overflow parking during winter.

APPENDIX A: CONCESSION-RELATED GOALS

GLACIER POINT

Remove intrusive facilities.

WAWONA

Provide a year-round traditional overnight experience at the Wawona Hotel.

Create a historically consistent visual quality within the historic zone.

Provide housing for concession employees when housing is not available outside the park boundary.

SOUTH ENTRANCE

Provide park orientation and information/reservation system for overnight accommodations.

MARIPOSA GROVE

Provide only visitor facilities consistent with preservation of the unique ecosystem; remove all other facilities not necessary for visitor enjoyment of the resource.

TUOLUMNE MEADOWS

Provide parkwide information and reservation services for visitors entering via Tioga Pass:

Provide overnight accommodations.

Improve the quality of employee housing.

WHITE WOLF

Increase camping opportunities and overnight accommodations.

Provide adequate housing for essential employees.

CRANE FLAT

Provide adequate support facilities to accommodate existing levels of winter use.

HODGDON MEADOWS

Provide an information/reservation system for visitors entering the park along the Big Oak Flat Road.

THE BACKCOUNTRY

The concession-operated High Sierra camps offer opportunities for people who desire a different kind of backcountry experience. These camps will continue to be used.

In the GMP, all the above items are broken down further into specific action items, the subject of the plan.

APPENDIX B: AIR QUALITY

Available data for pollutants monitored in Yosemite National Park are presented graphically in this appendix.

Data collected must be checked for accuracy in a three-step process. The first data are considered "raw" data. After verification, raw data become "preliminary"; after further verification, they are certified as "final." The most recent 1991 data are not included here because they are still preliminary.

OZONE

The National Park Service monitors ozone at Camp Mather (figure 1), Wawona (figure 2), and Yosemite Valley (figure 3). The California Air Resources Board monitors ozone at Turtleback Dome, but those data are not shown.

Figures 1, 2, and 3 illustrate the typical ozone season, in which ozone concentrations are higher between April and October. Maximum recorded hourly ozone averages and monthly ozone exposures greater than 60 parts per

billion (ppb) are compared for the three NPS monitoring stations in figure 4. The national ambient air quality standard is measured in parts per million (ppm), so that 120 ppb is equivalent to the 0.12 ppm ozone standard.

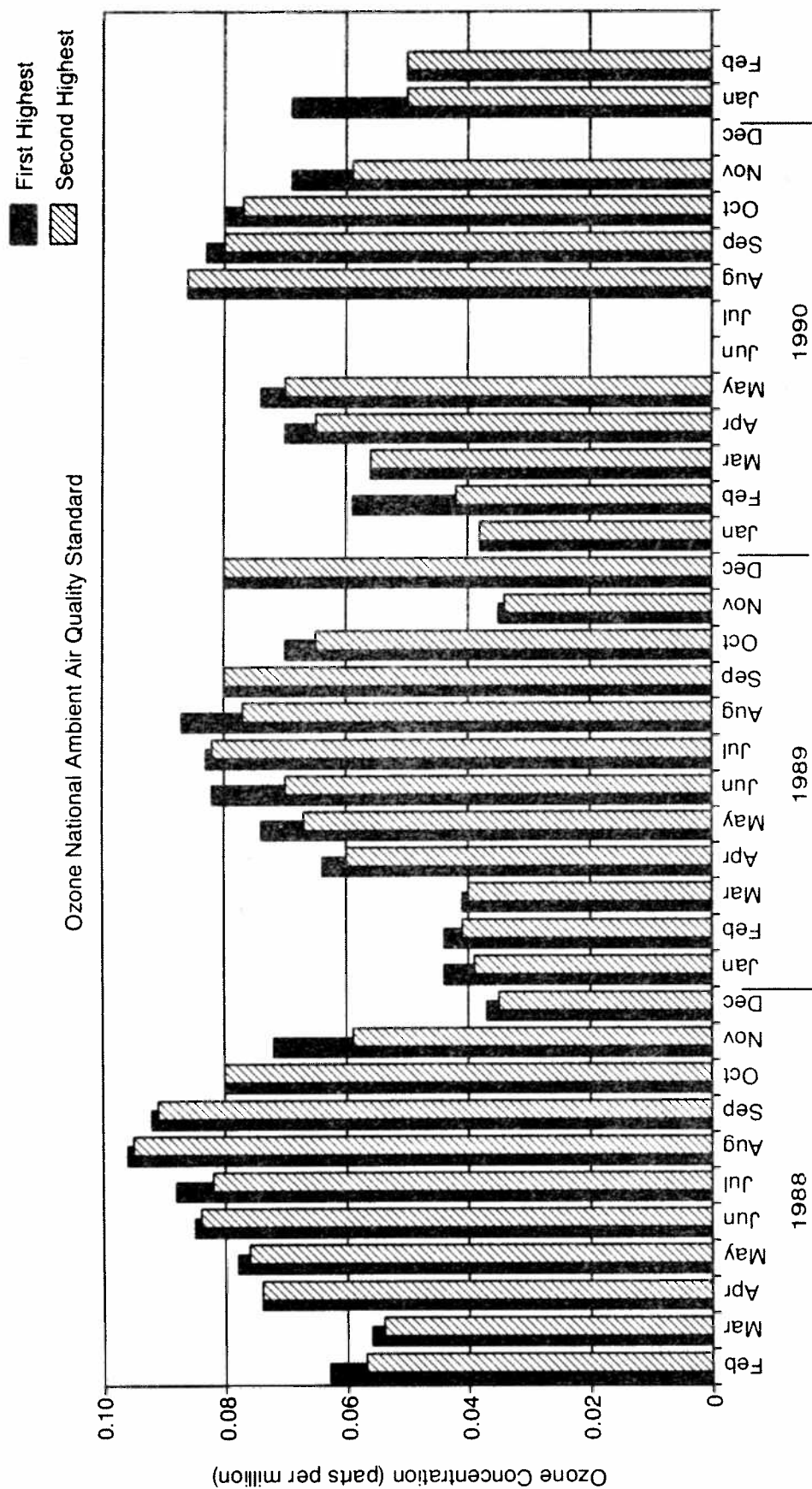
VISUAL RANGE

Park visibilities, measured as standard visual ranges, are lowest in summer because of elevated particulate concentrations (see figure 5).

PARTICULATE MATTER

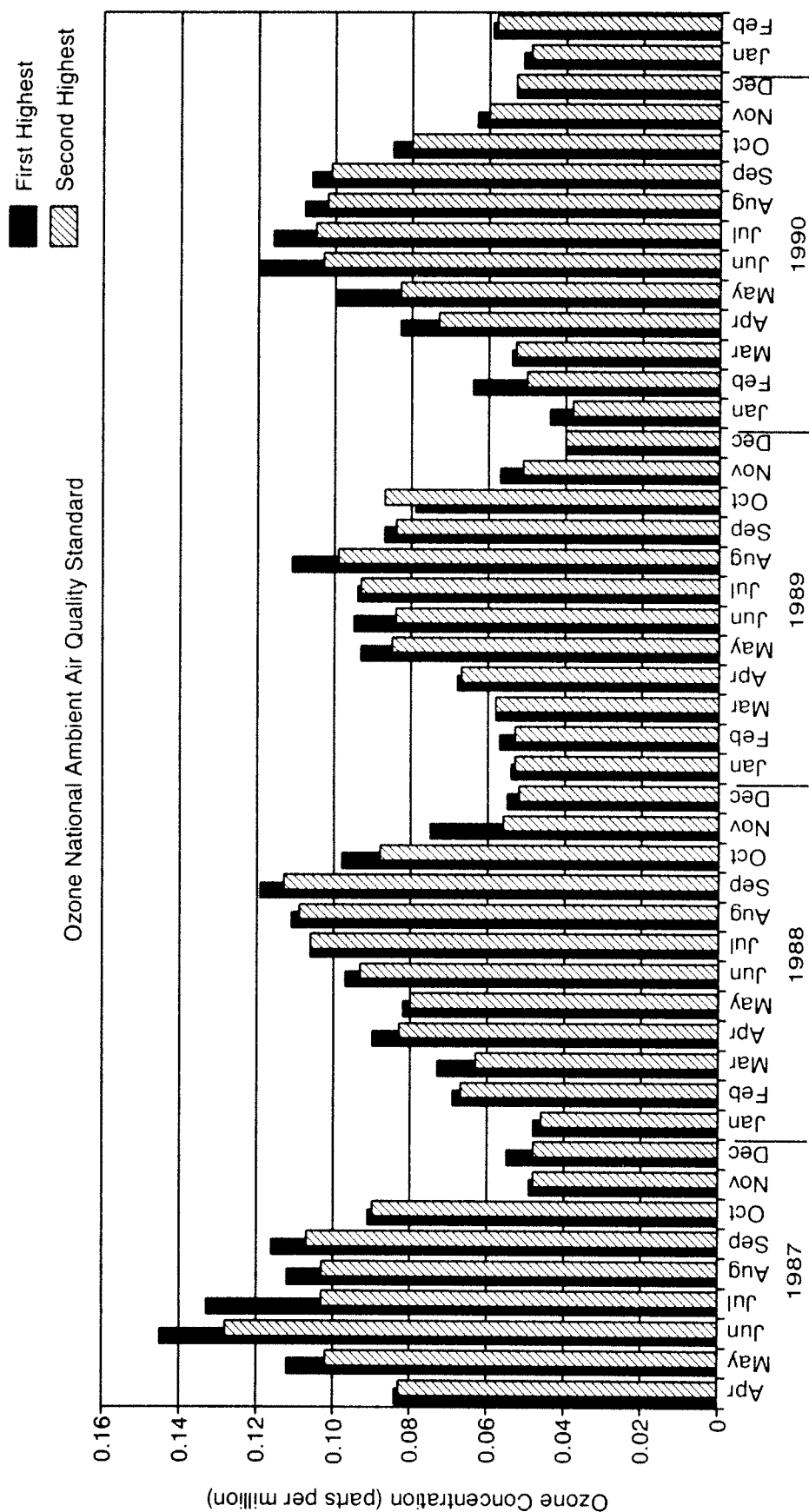
The National Park Service uses the "IMPROVE" monitor to measure fine particles that are suspended in the air (see figure 6). Such particles can cause visibility impairment or acid deposition. The major constituents of the fine particulates are organic compounds and ammonium sulfate. Levels of particulate matter in Yosemite are highest in summer and lowest in winter.

**Figure 1: Highest Hourly Ozone Concentrations for Each Month—Camp Mather
Yosemite National Park**



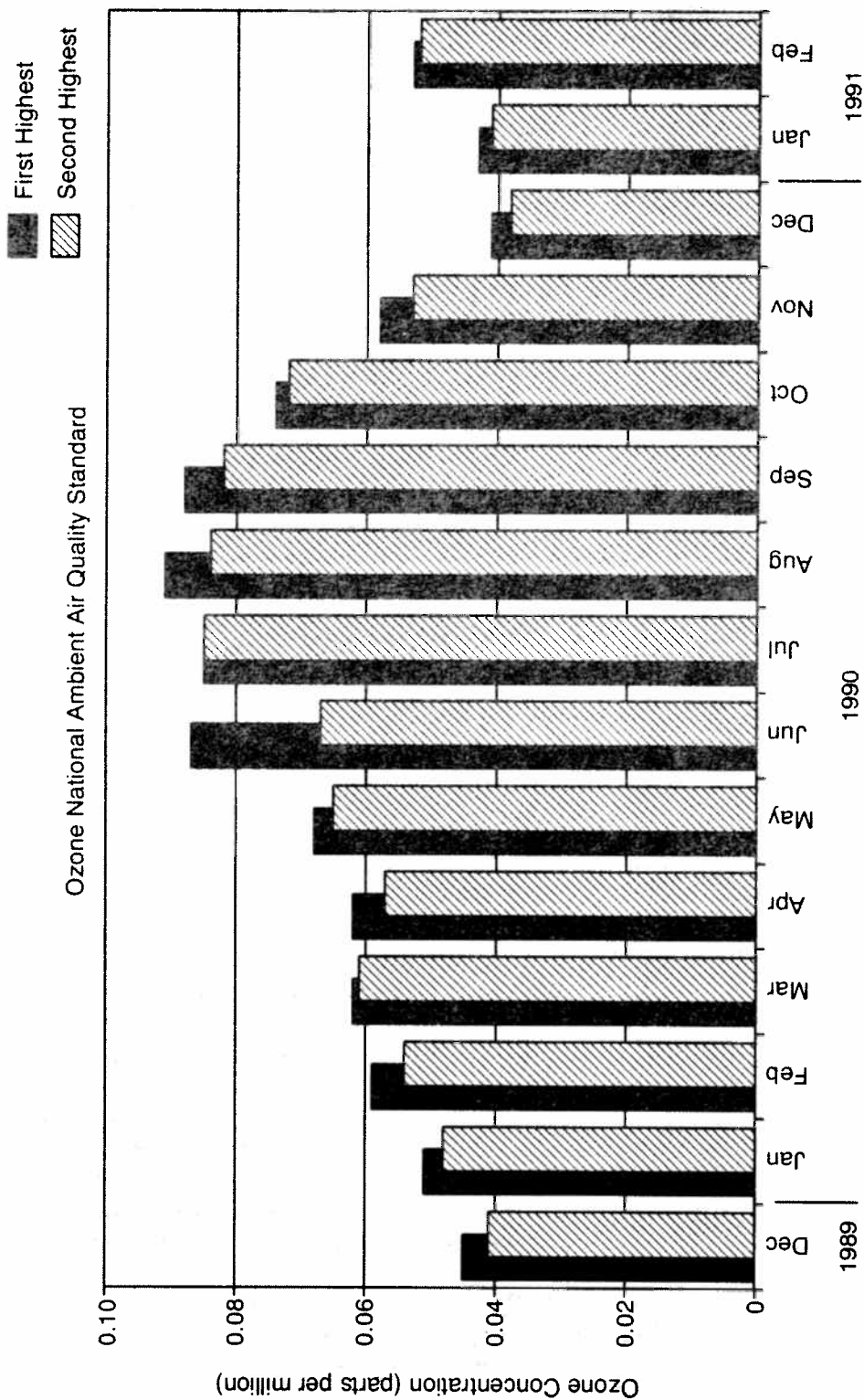
OZONE DATA ARE FINAL THROUGH MARCH 1989, AND PRELIMINARY AFTER THAT TIME

**Figure 2: Highest Hourly Ozone Concentrations for Each Month — Wawona Valley
Yosemite National Park**



OZONE DATA ARE FINAL THROUGH MARCH 1989, AND PRELIMINARY AFTER THAT TIME

Figure 3: Highest Hourly Ozone Concentrations for Each Month — Yosemite Valley
Yosemite National Park



OZONE DATA ARE PRELIMINARY

**Figure 4: Comparison of Ozone Exposures in Three Locations
Yosemite National Park**

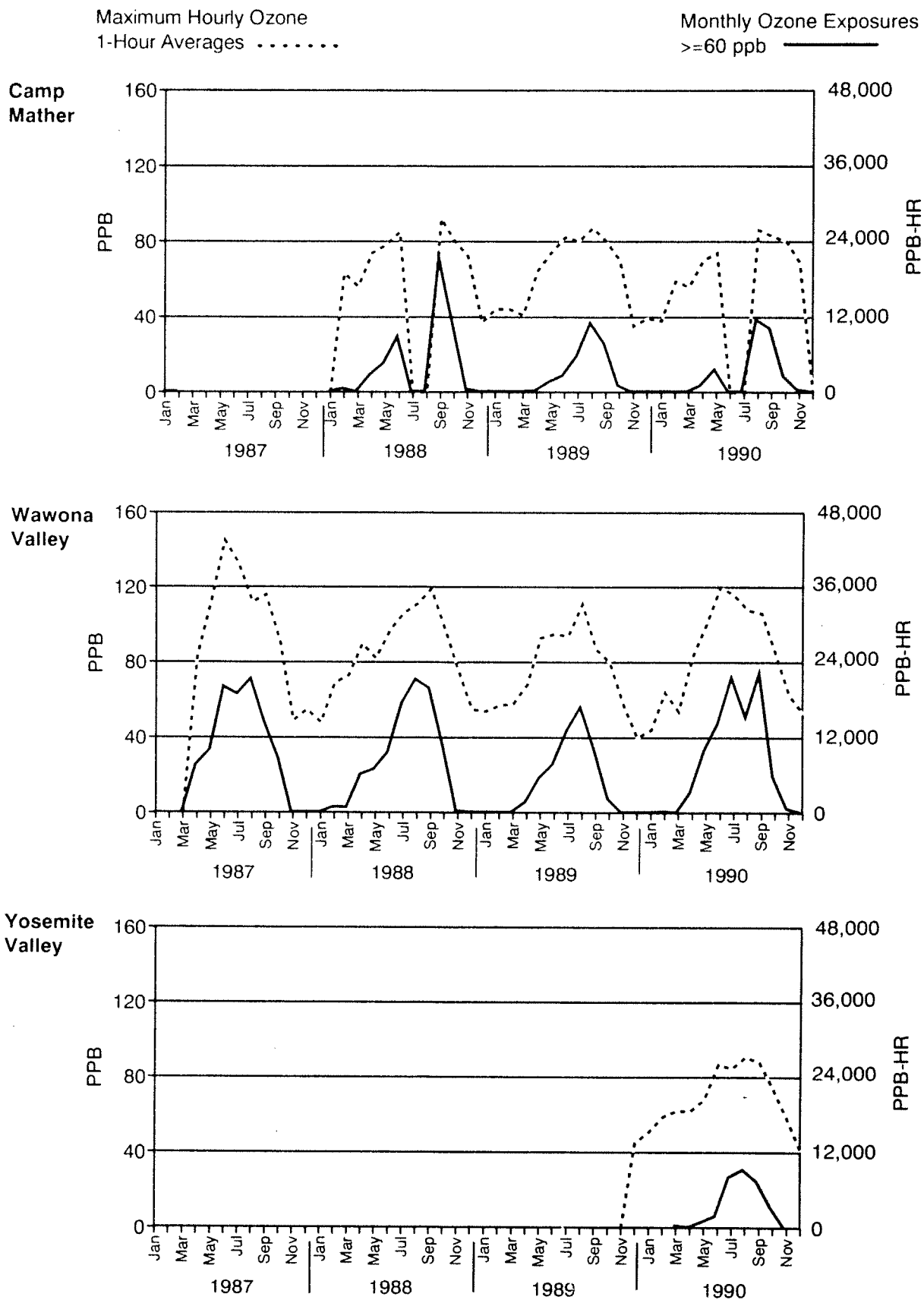


Figure 5: Standard Visual Range
Yosemite National Park
 (based on teleradiometer through October 1985; thereafter based on camera exposures and densitometry)

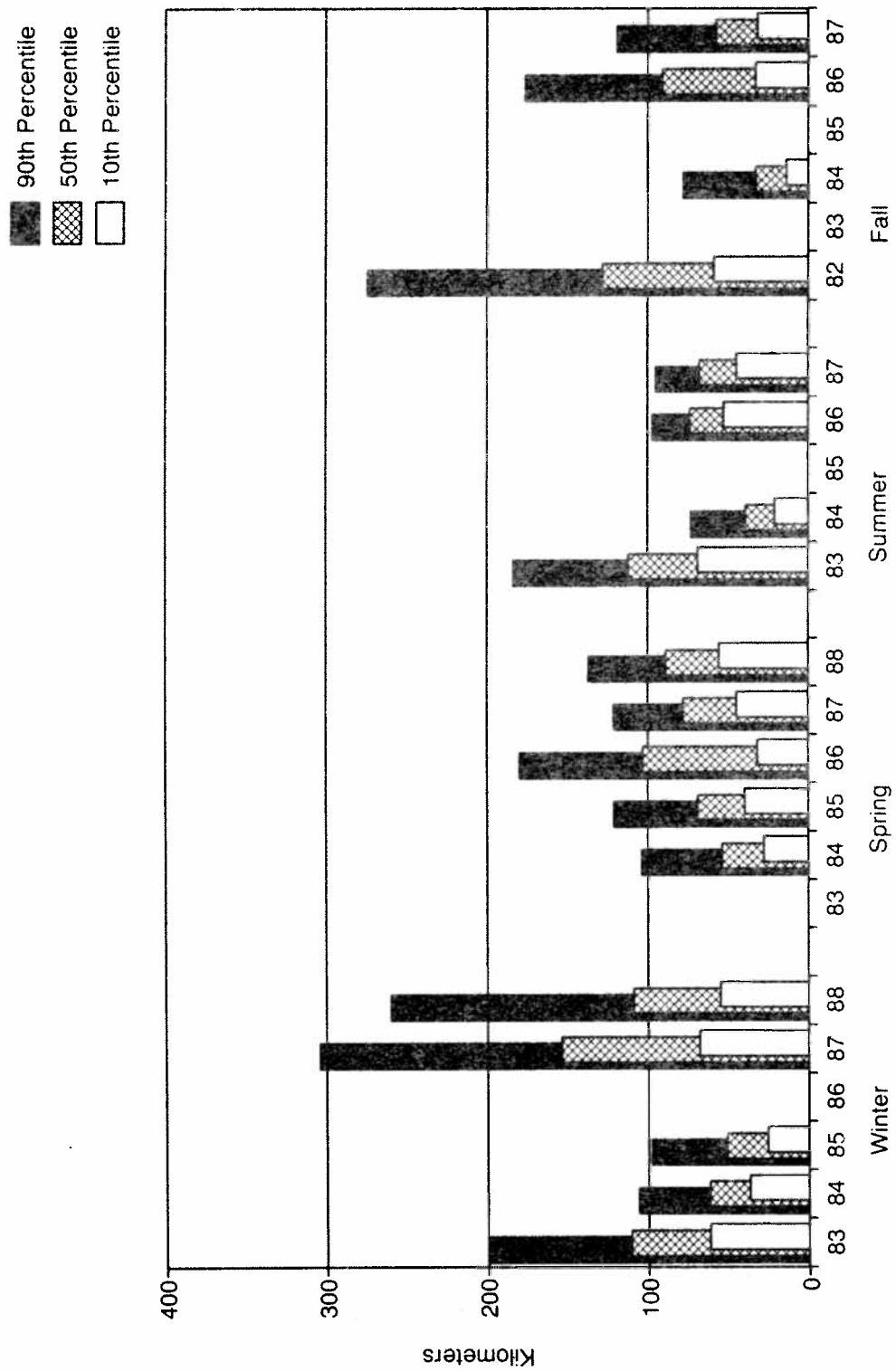
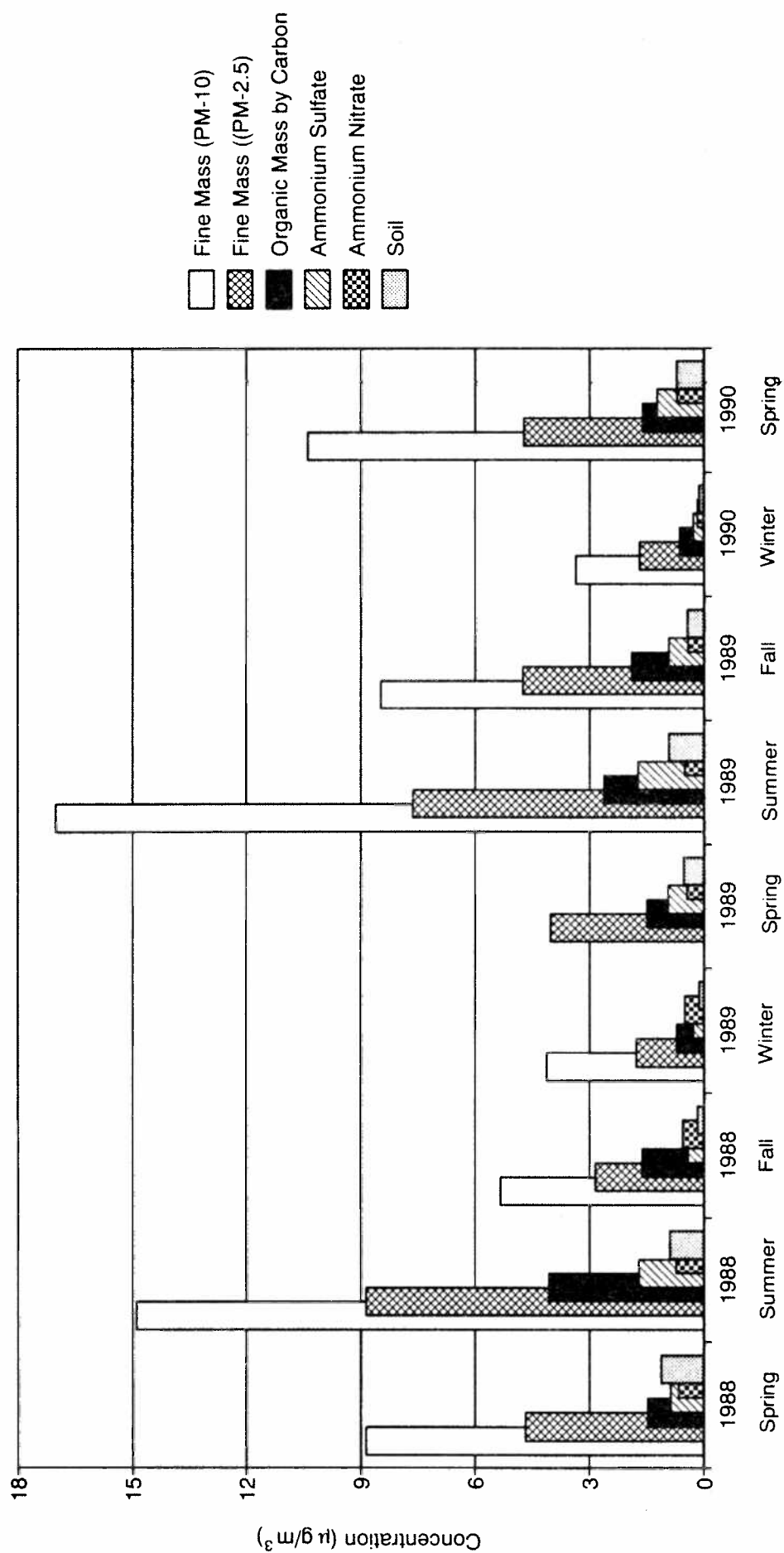


Figure 6: Particulate Matter
Yosemite National Park
(from "Improve" Monitor Sampler)



APPENDIX C: ESTIMATED WATER USE FOR CONCESSION LODGING

ESTIMATES BY TYPE OF LODGING

Estimates of water use were obtained from two sources, a publication of the Public Health Service, U.S. Department of Health and Human Services, entitled *Environmental Health Practice in Recreational Areas* (PHS 1977) and *Wastewater Engineering: Treatment, Disposal, and Reuse* (Tchobanoglous and Burton 1991). Estimates from the two sources differed for the types of establishment. The *Wastewater Engineering* estimates had no listing for hotel or motel units without baths. The developed campground estimate was substituted for calculations because campgrounds typically would have shared bath and shower facilities similar to those available for the Yosemite units without baths. All "without bath" units (hotel, motel, cabin, tent-cabin) were assigned the same estimate as "hotel without bath" in the Public Health Service estimates (table C-1).

Wastewater flows are a reasonable estimate in this case since all water used ends up in the wastewater system because there is no irrigation for landscaping. The Public Health Services estimates are higher than the wastewater estimates and should be considered a "worst-case scenario."

OCCUPANCY RATES BY LODGING AREA

An estimate of water use for all lodging units of one type in an area was obtained by multiplying the water use estimate for each type by the number of units. The result was multiplied by the average occupancy rate for each area to obtain an estimate of total water use for the type of lodging for each area. Average occupancy rates used are shown in table C-2.

TABLE C-1: ESTIMATED WATER USE FOR DIFFERENT TYPES OF LODGING
(IN GALLONS PER PERSON PER DAY)

Type of Lodging	Estimate per Wastewater Engineering	Estimate per Public Health Service Document
Cabin/cottage	40 ¹	50 ²
Campground	30 ³	50 ⁴
Hotel room	50 ⁵	40 ⁶
Hotel room without bath ⁷	30	50
Motel room	35	40 ⁸

1. Described as "resort cabin."
2. Described as "cottage with seasonal occupancy."
3. Described as "developed campground."
4. Described as "residential camp with limited plumbing."
5. Described as "resort hotel."
6. Described as "hotel with private bath."
7. No listing in *Wastewater Engineering*. PHS document refers to "hotel without private bath."
8. Described as "motel with bath and toilet."

TABLE C-2: OCCUPANCY RATES USED
TO DETERMINE WATER USE

Location	Persons per Night
Ahwahnee Hotel	2.3
Yosemite Lodge	2.4
Curry Village	2.6
Housekeeping Camp	3.5
Wawona Hotel	2.1
White Wolf	2.7
Tuolumne Meadows	3.0

WATER USE BY LODGING AREA

Use estimates for each lodging type in an area were added to obtain an estimate of total water use in each lodging area. The results are presented in table C-3.

TABLE C-3: WATER USE BY LODGING AREA
(gallons per day)

Location	1991 Existing	Alternative A: GMP Proposal	Draft Proposal Alternative B	Final Proposal Alternative B
<i>Yosemite Valley</i>				
Ahwahnee Hotel and cottages	11,868– 13,593	11,684– 13,363	11,868– 13,593	11,868– 13,593
Yosemite Lodge	41,808– 53,016	30,552– 37,680	37,416– 49,296	38,484– 46,416
Curry Village	52,052– 81,510	45,422– 70,590	35,360– 47,450	39,780– 54,600
Housekeeping Camp	29,400– 49,000	24,360– 40,600	24,360– 40,600	24,360– 40,600
Wawona	<u>8,064– 10,458</u>	<u>12,054– 14,805</u>	<u>11,508– 14,763</u>	<u>8,064– 10,458</u>
Subtotal, Yosemite Valley	135,128–197,119	112,018–162,233	109,004–150,939	114,492–155,209
<i>Areas Outside Yosemite Valley</i>				
White Wolf	4,104– 3,780	2,025– 3,375	2,025– 3,375	2,025– 3,375
Tuolumne Meadows	<u>6,210– 10,350</u>	<u>5,940– 9,900</u>	<u>5,940– 9,900</u>	<u>5,940– 9,900</u>
Parkwide Total	153,506–221,707	132,037–190,313	128,477–178,977	130,521–178,942

APPENDIX D: STATEMENT OF FINDINGS: FLOODPLAINS

The National Park Service has prepared a Concession Services Plan for Yosemite National Park to define the management of concessions. The plan focuses on means to implement the goals for concession services outlined in the 1980 General Management Plan. Based on the goal of the General Management Plan to retain a full range of accommodations, the proposals of the 1992 Concession Services Plan, and the limited availability of developable land in Yosemite Valley, the National Park Service proposes to retain the following visitor accommodations located within the 100-year floodplain of the Merced River in Yosemite Valley:

- 232 lodging units and associated facilities at Housekeeping Camp
- Pine Cottage at Yosemite Lodge
- the Ahwahnee cottages

The Yosemite Valley concession stables will be relocated out of the base floodplain. All Yosemite Lodge cabins will be removed from the base floodplain and replaced with redesigned units located out of the floodplain.

The store, post office, and gas station at Wawona are within the 100-year floodplain of the South Fork of the Merced River, as depicted in the 1980 General Management Plan. It is the intention of Yosemite National Park that these structures be relocated out of the floodplain. The development concept plan that will be prepared for Wawona will determine non-floodplain locations for these structures. If there are no feasible non-floodplain sites available, structural mitigation will be prescribed to the extent possible in subsequent design plans.

No critical actions are proposed in either Yosemite Valley or Wawona.

There is an approved flood plan for Yosemite National Park. The plan includes descriptions of meteorological conditions that indicate a potential flood emergency, and provides for warning and evacuation of park visitors and residents. The flood plan identifies winter and spring as the seasons subject to flood hazard. Yosemite Valley and Wawona are not subject to flash-flooding nor are they otherwise high hazard areas.

The Housekeeping Camp units were constructed in the 1960s to replace older structures. Based on hydraulic and floodplain data obtained from the Army Corps of Engineers, the water surface elevation of the flood is estimated to be approximately between 3966.5 and 3967.9 feet. The elevations at Housekeeping Camp are between 3960 and 3970 feet. Channel velocities at the left bank where the camp is located are estimated to be between 2 and 3 feet per second.

Although Housekeeping Camp is primarily used during the summer when the flood hazard is low, guests may be present from April to December. The Yosemite Flood Plan identifies Housekeeping Camp as a critical location based on previous flood behavior. Evacuation and, if possible, removal of furnishings, are non-structural mitigation actions prescribed for Housekeeping Camp in a flood emergency.

Structural mitigation of flood hazards to housekeeping units will be evaluated during the redesign of Housekeeping Camp. Due to the predicted depth of floodwaters at Housekeeping Camp, structural mitigation of the flood hazard may not be possible. Property loss from flood damage at

Housekeeping Camp would be minimal because the structures are poured concrete with inexpensive furnishings.

Pine Cottage was constructed in 1950. It survived floods in late 1950, 1955, 1964, and 1980. The lodge is located on the edge of the floodplain at approximately the same elevation as the surface water elevation of the 100-year flood, estimated to be 3963 feet. The velocity of the flood waters on the right river bank is estimated to be about 1.5 feet per second.

In response to public comments, the National Park Service revised the Concession Service Plan to include retention of Pine Cottage. By retaining the cottage, new construction will not be required to replace accommodations lost in this economy price range.

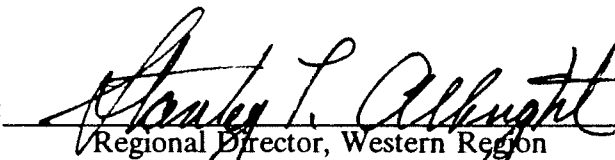
The Ahwahnee cottages were constructed in 1928. The cottages are at about 3974 feet elevation. The surface water elevation of the 100-year flood is estimated to be 3975 feet. No estimates of flood water velocity at this location were available from the Corps of Engineers.

There are no practicable alternative sites in Yosemite Valley for Housekeeping Camp, Pine Cottage, or the Ahwahnee cottages. Developable space in Yosemite Valley is limited by the extent of the 100-year floodplain, geologic hazards (rockfall zones), meadows and wetlands, sensitive species, and the extent of existing development. No new construction of lodging in undisturbed areas of the valley will be allowed. There are no previously disturbed areas in Yosemite Valley suitable for construction of replacement lodging that are of adequate size and have sufficient infrastructure available. Because reducing congestion in existing valley developed areas is a goal of the General Management Plan, relocating lodging to other developments is not acceptable.

Both the Pine and Ahwahnee cottages may require floodproofing to meet the Standards and Criteria of the National Flood Insurance Program (44 CFR 60). Structural floodproofing measures to meet program requirements will be evaluated as part of the Yosemite Valley redesign planning currently underway. Depth and velocity of floodwaters and impacts of various mitigation strategies on floodplain values will be considered during selection of a structural mitigation method.

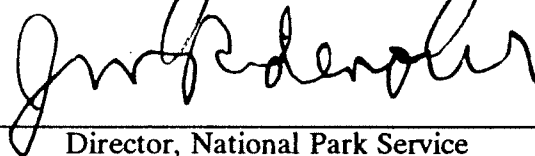
In summary, the National Park Service has determined that the existing locations are the only practicable alternatives for Housekeeping Camp, Pine Cottage, and the Ahwahnee cottages. Non-floodplain locations for the Wawona store, post office, and gas station will be evaluated in a development concept plan. The risks to life and property will be minimized by implementation of the emergency evacuation plan and warning signs. Where feasible, structures remaining in the floodplain will be floodproofed. There will be minimal effect on natural and beneficial floodplain values.

Recommended:


Regional Director, Western Region

JUN 2 1992
date

Approved:


Director, National Park Service

6/16/92
date

REFERENCES

- Beedy, Edward C., and Stephen L. Granholm
 1985 *Discovering Sierra Birds*. N.p.: Yosemite Natural History Association and Sequoia Natural History Association.
- California. Department of Fish and Game. Wildlife Management Division
 1986 *The Status and Distribution of the Willow Flycatcher in California, 1986*, by John H. Harris, Susan D. Sanders, and Mary Anne Flett. Administrative report 88-1. N.p.
- 1982 *The Status and Distribution of the Willow Flycatcher (Empidonax traillii) in Selected Portions of the Sierra Nevada, 1982*, by Melody Serena. Administrative Report 82-5. N.p.
- Gaines, David
 1988 *Birds of Yosemite and the East Slope*. Lee Vining, CA: Artemisia Press.
- Gramann, James H.
 1992 "Visitors, Alternative Futures, and Recreational Displacement at Yosemite National Park." Report prepared for Western Regional Office, National Park Service by Department of Recreation, Park and Tourism Sciences, Department of Rural Sociology, Texas Agricultural Experiment Station, Texas A&M University, College Station, TX.
- Greene, Linda W.
 1987 *Historic Resource Study: Yosemite: The Park and Its Resources*. 3 vols. Denver: National Park Service, Denver Service Center.
- Hall, E. Raymond
 1981 *The Mammals of North America*. Second edition, 2 volumes. New York: John Wiley and Sons.
- Hayes, Marc P., and Mark R. Jennings
 1988. "Habitat Correlates of Distribution of the California Red-legged Frog (*Rana aurora draytonii*) and the foothill Yellow-legged Frog (*Rana boylei*): Implications for Management." In *Management of Amphibians, Reptiles, and Small Mammals in North America: Proceedings of the Symposium, July 19-21, 1988, Flagstaff, Arizona*. 144-158. General Technical Report RM-166. Fort Collins, CO: Rocky Mountain Forest and Range Experiment Station, Forest Service, U.S. Department of Agriculture.
- Leigh, Scott & Cleary, Inc.
 1991 *Yosemite Transportation Study: Final Report*. Denver: Leigh, Scott & Cleary, Inc. Prepared under contract for the National Park Service, Denver Service Center, for the *Yosemite Housing Plan/Draft Supplement EIS*.
- Moratto, Michael J.
 1981 *An Archeological Research Design for Yosemite National Park, California*. Publications in Anthropology 19. Tucson, AZ: Western Archeological and Conservation Center, National Park Service.

REFERENCES

National Park Service

- 1978 *Draft Environmental Statement: General Management Plan: Yosemite National Park, California.* Denver.
- 1980a *Final Environmental Impact Statement: General Management Plan: Yosemite National Park, California.* Denver.
- 1980b *General Management Plan: Visitor Use/Park Operations/Development: Yosemite National Park, California.* [Denver].
- 1983 *Interpretive Prospectus: Yosemite National Park.* Harpers Ferry, WV.
- 1985 *Environmental Assessment: Reconstruct Water System, Wawona Area: Yosemite National Park, California.* Denver.
- 1987 *Project Summary: Yosemite Valley/El Portal Comprehensive Design.* Denver.
- 1989a *Road System Evaluation: Parkwide Road Engineering Study: Yosemite National Park, California.* N.p.
- 1989b *Wastewater Engineering Study: Tuolumne Meadows: Yosemite National Park, California.* Denver.
- 1990 *Yosemite National Park Merced River Restoration Strategy: Workshop April 24-26, 1990: Proceedings.* N.p.

Public Health Service, U.S. Department of Health and Human Services

- 1977 *Environmental Health Practice in Recreational Areas.* Prepared by Centers for Disease Control. N.p.

Smillie, Gary, and Larry Martin

- forth- *Draft manuscript for a report in the National Park Service Water Resources Division coming report series.*

Stebbins, Robert C.

- 1985 *A Field Guide to Western Reptiles and Amphibians.* Peterson Field Guide Series. Boston: Houghton Mifflin.

Tchobanoglous, George, and F. L. Burton

- 1991 *Wastewater Engineering: Treatment, Disposal, and Reuse.* Series editors, Metcalf and Eddy, Inc. New York: McGraw-Hill.

Wilson, Don E.

- 1982 "Wolverine." In *Wild Mammals of North America: Biology, Management, Economics*, edited by Joseph A. Chapman and George E. Feldhamer, 644-652 (ch. 32). Baltimore: Johns Hopkins University Press.

PREPARERS AND CONSULTANTS

PREPARERS

Name	Position ¹	Education	Years With NPS	Area of Contribution to Plan
Bonnie Campbell	Park Planner/ Team Captain	MS, Sociology	20	Summary; Purpose; Consultation
Susan Overson	Landscape Architect	MA (candidate), Landscape Architecture	1	Maps
Aida Parkinson	Natural Resource Specialist	MA, Zoology	6	Affected Environment; Environmental Consequences
Catherine H. Spude	Archeologist	Ph.D., Anthropology	16	Affected Environment; Environmental Consequences
Frank Williss	Historian	MA, History	14	Affected Environment; Environmental Consequences
Robert Yearout	Concession Analyst	MA, Government	26	Alternatives; Affected Environment; Environmental Consequences

1. All these National Park Service Employees are based at the Denver Service Center.

CONSULTANTS

Annette Catamec, Concessions Management Specialist, Yosemite National Park
 Stephen G. Crabtree, Chief, Concession Program Management Division, Western Regional Office
 Doug Denio, Environmental Engineer, Denver Service Center
 Michael Finley, Superintendent, Yosemite National Park
 Jim Hammett, Natural Resource Specialist, Denver Service Center
 Jacob Hoogland, Chief, Environmental Quality Division, Washington Office
 James R. Huddlestun, Environmental Protection Specialist, Western Regional Office
 Kheryn Klubnikin, Coordinator, Western United States & Pacific, Environmental Quality Division, Washington Office
 Mike Morelli, Landscape Architect, Denver Service Center
 Maurice Miller, Section Chief, Planning Branch, Western Team, Denver Service Center
 Bob Moody, Chief, Planning and Operations Branch, Concessions Division, Washington Office
 Martin Nielson, Chief, Concessions Management Division, Yosemite National Park
 Shelley Wells, Civil Engineer, Denver Service Center
 Ron West, Natural Resource Specialist, Denver Service Center
 Yosemite National Park Management Staff



As the nation's principal conservation agency, the Department of the Interior has responsibility for most of our nationally owned public lands and natural and cultural resources. This includes fostering wise use of our land and water resources, protecting our fish and wildlife, preserving the environmental and cultural values of our national parks and historical places, and providing for the enjoyment of life through outdoor recreation. The department assesses our energy and mineral resources and works to ensure that their development is in the best interests of all our people. The department also promotes the goals of the Take Pride in America campaign by encouraging stewardship and citizen responsibility for the public lands and promoting citizen participation in their care. The department also has a major responsibility for American Indian reservation communities and for people who live in island territories under U.S. administration.

Publication services were provided by Joan Huff, visual information technician; Lou Layman, editor; Jan Stickland, visual information technician; and Robert Todd, cartographic technician, of the Branch of Publications and Graphic Design, Denver Service Center. NPS D-375A August 1992

UNITED STATES DEPARTMENT OF THE INTERIOR / NATIONAL PARK SERVICE