

December 19, 2001

Superintendent David Mihalic
Yosemite National Park
P.O. Box 577
Yosemite, CA 95389

Re: The Lower Yosemite Falls Project

Dear Superintendent Mihalic:

The Access Fund is pleased to submit these comments on the Draft Environmental Assessment ("the DEA") for the Lower Yosemite Falls Project ("the Project"). The citations below are to the DEA unless otherwise noted.

The Access Fund is a 501 (c) 3 non-profit advocacy group representing the interests of climbers throughout the United States and is America's largest national climbing organization, with over 15,000 members and affiliates from across the country. We advocate on behalf of approximately one million climbers in the United States. The Access Fund's mission is to keep climbing areas open and to conserve the climbing environment. Preserving the opportunity to climb and the diversity of the climbing experience are also fundamental to our mission. Working in cooperation with climbers, other recreational users, public land managers and private land owners, the Access Fund promotes the responsible use and sound management of climbing resources. We encourage an ethic of personal responsibility, self-regulation, strong conservation values and minimum impact practices among climbers.

As a general matter, we strongly support the Project and the efforts of the Park Service to improve the visitor experience in Yosemite Valley. The Project represents a substantial first step towards the implementation of the Valley Plan, and we believe that it will greatly improve the visitor experience at Lower Yosemite Falls. The Access Fund has itself supported this effort by encouraging the authors of the Yosemite climbing guidebook to remove references to climbs in the Lower Yosemite Falls amphitheater from the guidebook, in order to reduce the visual impacts of climbing on other visitors to the falls.

We are concerned, however, by the proposal in the DEA to park tour buses along Northside Drive adjacent to Camp 4. We believe this will have a negative impact on the visitor experience of campers at Camp 4, and that the buses should be parked farther west on Northside Drive, between the Middle Brother rockfall and the El Capitan crossover. This issue is discussed in more detail in the remainder of this letter.

In describing the preferred alternative, the DEA states:

Until day tour bus parking can be provided elsewhere, as called for in the Yosemite Valley Plan, day tour buses would for the interim park in an existing

lane of Northside Drive, extending west of Camp 4. Day tour buses would park in the north (right) lane of the road until passengers are ready for pickup. When passengers are ready to load, buses would return to Northside Drive near Cook's Meadow for passenger pickup. Interim parking for the few overnight tour buses would be provided in existing parking areas associated with nearby lodging facilities in Yosemite Valley.

Chap. 2, page 3. We note that while the DEA describes the bus parking as "extending West of Camp 4," thereby conveying the impression that the bus parking might start west of Camp 4 and continue westward, we understand that the parking will start at the entrance to Camp 4 and extend west from there, so that buses would be adjacent to the campground, not just west of it. The DEA should be revised to accurately describe the area in which the parking is proposed and avoid the use of vague language like this which is misleading to reviewers.

If bus parking begins at the entrance to Camp 4, then the campground will be lined with buses throughout the day on every day of the prime visitor season. The DEA notes that 63 tour buses a day visit the park, Chap. 3, page 17, and we would expect this number to grow steadily, reflecting the general trend towards greater park visitation each year. There are currently 22 bus parking spaces at the Lower Yosemite Falls parking lot. Chap. 3, page 18. Park staff have told us that there are often more buses than the 22-space parking area can accommodate in the summer.

Consequently, we assume that there could be easily be 22 buses parked along North Side Drive at any one time, and possibly more. Camp 4 extends for approximately 1,200 feet along Northside Drive (scaling off the map in the Valley Plan.) Assuming each bus is 60 feet long and needs approximately 80 feet in which to park, just 15 buses would be enough to line North Side Drive for the entire length of the campground. Since this number is only one-quarter of the total number of buses that arrive each day, and less than the currently inadequate bus parking area, we have to assume that on most days during the summer season, Camp 4 would be completely lined with buses.

Moreover, the movements of these buses could be nearly continuous throughout the middle of the day. If bus parking were limited to the hours of 10:00 a.m. to 4:00 p.m. (a mitigation measure we have proposed, and one which likely reflects the actual movements of the buses anyway), and 60 day-tour buses a day arrived to visit the falls, there would be 120 bus arrivals and departures per day at the bus parking area next to Camp 4. Over our proposed 6-hour parking period, a bus would arrive or depart the parking area, on average, every three minutes.

The noise made by the arrival and departure of these buses would be a considerable irritant to campers in Camp 4. In addition, bus drivers like to keep their engines running in order to keep their air conditioners going and the bus interiors cool. This is an additional source of noise. The DEA notes that this bus parking "would temporarily increase noise levels in the Camp 4 area during certain times of the day (i.e. mid-day)." Chap. 4, page 47. No analysis of decibel levels associated with the bus parking is

presented, however. This is an important omission, since as noted above, the noise of these buses could be nearly continuous.

To minimize the impact on campers in Camp 4 from the noise of these buses' engines, the DEA proposes to limit bus parking along North Side Drive "to the time of day that would impact campers the least." Chap. 2, page 15. The DEA suggests that by limiting bus movements to the middle of the day, when Camp 4 visitors would likely be away from the campground, "the impact on visitors using Camp 4 would be minimal." Chap. 4, page 65. As further assurance, the DEA proposes to "restrict buses from idling at all times" and to staff the bus parking area "to ensure that . . . buses to do not idle while parked." Chap. 2, page 16.

We are concerned that these noise mitigation measures will not be adequate to protect the visitor experience of campers at Camp 4. The DEA characterizes this parking arrangement as "interim" but does not state how long this arrangement might continue. Since there is still no implementation schedule for the Valley Plan, the public has no way of knowing how long this use might go on. We have to assume, however, that it could be for as many as 10 years—particularly since permanent day bus parking at Yosemite Village is likely to be a low priority item for the Valley Plan and because, I believe, no funding for lower priority items has been made available. (The Valley Plan calls for permanent day tour bus parking in an area on the north side of Yosemite Village. Valley Plan Volume IA at 2-48. Presumably, this would require demolition of the Park Service's huge garage there, a further obstacle which also suggests that this permanent bus parking area will not appear soon.) Certainly, experience with the park's 1980 General Management Plan shows that needed facilities identified in the park's general plan can go unfunded for decades.

Nor are we reassured by the DEA's statements that the parking area will be staffed to prevent buses from idling or that the hours during which buses are parked will be limited to protect campers. We doubt whether the Park Service has sufficient staff to manage the bus parking area on a full time basis. We are concerned that staffing is likely to consist of an occasional pass by a ranger in a patrol car, who if he heard a bus with its engines running would have to find a place to pull off on the left side of the road, get out of his car, and walk back to the offending bus to tell the driver to turn off the engine. We think this is not likely to occur with great frequency.

Nor is the DEA's vague statement that parking will be limited to "the time of day that would impact campers the least" sufficiently specific to offer much comfort. Since the DEA offers no hard hourly limits, the implication is that the NPS will allow the parking hours to float in whatever manner proves convenient, content to assume that most buses will arrive after the early morning hours and leave before evening. The lack of specific time limits in this mitigation measure strips it of any real meaning. At a minimum, bus parking should be limited to the hours of 10:00 a.m. to 4:00 p.m. Even this limitation, however, would not prevent substantial noise impacts on Camp 4, as noted above. Moreover, no information is provided as to the numbers of visitors who are typically in

the campground during the day. While it is logical to assume that most will be out and about, no effort has been made to confirm this by surveys.

The DEA omits any discussion of the visual impacts of the parked buses on the visitor experience at Camp 4, see Chap. 4, page 61, and dismisses the intrusion of the buses on the atmosphere of the campground as "imperceptible," Chap. 4, page 58. While the buses would be parked in an inactive lane of an otherwise active and busy roadway, the visual impact of stationary vehicles is different from that of the moving vehicles they will displace. Their presence will not only block views from Camp 4 to the south towards Leidig Meadow but will change the immediate ambiance of the campground by introducing a wholly new and very disparate visual element—a solid row of large, shiny vehicles along the campground border.

Because this bus parking arrangement may last for years and, even with the mitigations proposed would have substantial noise and visual impacts on Camp 4, we propose instead a mitigation measure that will ensure no impacts on Camp 4 from interim bus parking: have the buses park farther west on Northside Drive, from the west end of the Middle Brother rockfall zone to the El Capitan crossover. This removes the buses completely from the Camp 4 area and ensures that bus parking will have no impact on campers in the campground.

A glance at the map of the Valley shows that there are two straight sections of Northside Drive that could accommodate the buses: one immediately west of the rockfall zone extending to the first major curve in the road, and the second extending from this curve to Devils Elbow, just before the El Capitan crossover. These have lengths of about 2,500 feet and 3,500 feet respectively, well more than the approximately 2,500-foot length of the parking alongside and west of Camp 4.

Accommodating the needs of bus drivers should not be an obstacle to moving the bus parking westward. Bus drivers have toilets on their buses, and would have access to the toilets of other buses or the picnic area at Ranger Rock. They can bring their lunches from home or buy a take-out lunch at a stop on the way to the park and eat it after they have left off their passengers and parked their bus on Northside Drive. They could bring a folding chair and enjoy their lunch at the Ranger Rock picnic area, El Capitan Meadows, or anyplace along the river. Asking the drivers to sit and contemplate the World's Most Beautiful Place while being paid for working should not impose too much of a hardship on them. If drivers still feel they need access to the valley's developed facilities, the tour bus companies should be invited to organize their own shuttle car that would take the drivers to the Lodge or Curry Village. In this way, the bus companies would be taking responsibility for minimizing the impacts of their operations on the Valley, rather than simply dumping these impacts on campers at Camp 4.

Our standard for judging impacts to the visitor experience at Camp 4 has been and remains, "would they do this to visitors at the Ahwahnee?" As we pointed out in our comments on the Valley Plan, we believe the Park Service has yet to recognize that camping is the form of overnight accommodation with the greatest potential to fulfill the

primary purpose of the park, which is "to promote visitor enjoyment of park resources through a direct association or relation to those resources." NPS Management Policies 8.2 (1988). Because of this potential, the camping experience at Camp 4 and other park campgrounds deserves the highest level of protection accorded to any form of park accommodation. Since we are quite certain that the Park Service would think very long and very hard before parking buses along the road to the Ahwahnee because of the impact on visitors there (wholly apart from the practical difficulties of doing so), we ask the Park Service, in what we hope will be the beginning of a slow change in its perception of camping in the Valley, to accord the same or a higher level of concern to the visitor experience of campers at Camp 4—particularly since Camp 4 enjoys special stature among the Valley's campgrounds because of its newfound historic significance.

I spoke to Chip Jenkins, Chief of Strategic Planning and Partnerships, and Marty Neilson, Chief of Business and Revenue Management for the park. Both of these officials were receptive to our idea to move the bus parking westward, and neither cited any reason why this could not work. Linda McMillan of the Alpine Club, who has been active on Camp 4 issues, also supports this proposal.

We look forward to the opportunity to discuss this issue with park staff further and, if appropriate, to meet with you in the Valley to resolve our concerns in regard to the proposed bus parking at Camp Four.

Sincerely yours,

Paul Minault

Access Fund Regional Coordinator For Northern California

cc: Sam Davidson, Executive Director

Shawn Tierney, Acquisitions and Access Director

Jason Keith, Senior Policy Analyst

Marty Nielson, Chief of Business & Revenue Management, Yosemite National Park

Linda McMillan, Vice President, American Alpine Club