

April 30, 2013

Don Neubacher, Superintendent  
Yosemite National Park  
P.O. Box 577  
Yosemite, CA 95389

Sent Via Email

Please Confirm Receipt

**RE: COMMENTS—MERCED RIVER PLAN DRAFT ENVIRONMENTAL IMPACT STATEMENT**

Superintendent Neubacher, Kathleen, and Planning Team:

After being actively involved and active for 33 years with various planning teams on various issues and projects, this one is even more discouraging, especially in light of the perceived “partnering” that was supposed to distinguish itself from the others and approximate 3000 pages of documents to waddle through. Attempting to review the MRP online became pointless by a longshot. Hard copies had to be requested to even begin the review. The size of the plan pushed away the most avid interested party, almost to say that staff intended or preferred intimidation. Trying to use the summary only further discouraged review of the documents because the campground count is misleading and with great and misleading error, which created the opinion that the “books have been cooked” so why bother going deeper. That said, perseverance ensued and the comments are hereby provided.

As with past comments, these come with very impassioned purpose after the expense of much time, costs, and resources motivated by and representing millions of campers’ frustration that have been disenfranchised from the results of this and previous plans by the hands and minds of a select and few YNPS staff. It is unfortunate that so little time has been given to the public to respond, especially the Yosemite Valley campers.

We hope that you will spend the time to thoroughly read our comments with equal intensity and that you may have an epiphany and take our comments to heart for modifications to the MRP DEIS that represents and concerns Yosemite Valley campers, affordable access to our Park, and common sense.

Sincerely,

*Brian H. Ouzounian*

Co-Founder  
Yosemite Valley Campers Coalition  
Email: brian.oci@sbcglobal.net

Yosemite Valley Campers Coalition (YVCC)  
www.yosemitevalleycampers.org  
Comments to the New MRP  
By Brian H. Ouzounian Co-Founder  
04-30-13

The following comments and requests for the New MRP to the Yosemite National Park Planning Staff (YNPS) represent over 20 million Yosemite Valley campers:

1.0 First, the letter by retired Congressman from California, Tony Coelho, which justifies a complete and thorough investigation of the DOI planning actions in Yosemite from the 1980 GMP to present, including its misuse of public funds; it is provided as follows:

*TONY COELHO*

*51 Baltimore Ave #2*

*Rehoboth Beach, DE 19971*

*April 13, 2013*

*Mr. Jon Jarvis*

*Director National Park Service*

*1849 C Street N.W.*

*Washington D.C. 20240*

*Dear Mr. Jarvis:*

*I am Tony Coelho, retired Congressman from California. I am the author of the legislation that included the Merced River in the Wild and Scenic Rivers Act (WSRA)*

*I have been asked to clarify the legislative intent of this action. The WSRA was never intended to apply to the Merced River within Yosemite National Park at all. The Merced River within Yosemite National Park is protected and regulated by the National Park Service (NPS) and has never needed an overlay of inconsistent and confusing regulation. The WSRA designation was intended to apply to the Merced River outside the Park to the west.*

*The Merced River in Yosemite Valley has been recreational for almost 150 years. Yosemite Valley has never been wilderness. Any plan which proceeds under the WSRA should not change any infrastructure, or ban any activities traditionally carried on in Yosemite Valley such as bicycle rental, raft trips, daily horseback rides, or removal of the ice rink or swimming pools, nor should it require removal of historic bridges. I oppose any such measures. Yosemite Valley should be left as it is under any Plan required by the WSRA, subject only to traditional management by the NPS.*

*There is a simple and reasonable way to accomplish this. That is to remove the Merced River within Yosemite Valley (which has been designated recreational) from any Plan required by the WSRA in the same manner the preexisting Hetch Hetchy Dam has been removed from the Tuolumne River Plan. This will end litigation and acrimonious controversy and allow Yosemite to be enjoyed by the public in the traditional manner, as intended in the original grant and the Organic Act of 1916 establishing National Parks.*

*I urge this action to allow the 3,000,000 visitors per year to continue enjoying Yosemite.*

*Sincerely,*

*Tony*

2.0 YNPS, in a consistent and substandard form, did not reached out to the deep data base of campers to involve them in the process and allow them to respond and as a result have breached and skewed the process by which it heralds to be a champion. Limiting the outreach to campers mitigates their input, which, judging by our petition on our website would be overwhelming in opposition (ref: [www.yosemitevalleycampers.org](http://www.yosemitevalleycampers.org)). It is our opinion that the YNPS purposely refused to reach camping respondents knowing full well that it would invite huge and impassioned responses in favor of valley camping as a priority that the planners did not want to address.

3.0 In 1864 President Abraham Lincoln and the U.S. Congress passed the Yosemite Grant of 1864. The President commissioned the Park to the State of California via the famous architect Frederick Law Olmstead who authored Yosemite and the Mariposa Grove: A Preliminary Report, 1865. The basic intent for access to the Park is true today as it was in 1865 with reference to pages xvi and xvii of the introduction and page 12 as follows:

Page xvi and xvii:

“He describes the beneficial effect of natural scenery upon the human mind, and claims that a republic owes this benefit to its ordinary citizens.

*If we analyze the operations of scenes of beauty upon the mind, and consider the intimate relation of the mind upon the nervous system and the whole physical economy, the action and reaction which constantly occurs between bodily and mental conditions, the reinvigoration which results from such scenes is readily comprehended.*

He argues that British statesmen remain very active into old age because they retreat regularly to their private parks or the mountains. But in America, he believes, this invigorating contact with natural scenery should be available to all citizens. Therefore, it is the duty of a republican government to safeguard its most impressive scenic areas for the use of its citizens.....His first recommendation is preservation: .....His second recommendation is public access. Only those travelers who were able to afford a lengthy trip by pack train could visit the Yosemite Valley in Olmstead’s day. [“As long as the present arrangements continue, he wrote, Yosemite “will remain, practically, the property only of the rich.”].

Page 12:

“It is a scientific fact that the occasional contemplation of natural scenes of an impressive character, particularly if this contemplation occurs in connection with relief from ordinary cares, change of air and change of habits, is favorable to the health and vigor of men and especially to the health and vigor of their intellect beyond any other conditions which can be offered them, that I it not only gives pleasure for the time being but increases the subsequent capacity for happiness and the means of securing happiness. The want of such occasional recreation where men and women are habitually pressed by their business or household cares often results in a class of disorders the characteristic quality of which is mental disability, sometimes taking the sever forms of softening of the brain, paralysis, palsey, monomania, or insanity, but more frequently of mental and nervous excitability, moroseness, melancholy, or irascibility, incapacitating the subject for the proper exercise of the intellectual and moral forces.

It is well established that where circumstances favor the use of such means of recreation as have been indicated, the reverse of this is true.”

This book is available (U.S. \$7.00) via the Yosemite Association, PO Box 545, Yosemite National Park, CA 95389 and is made a part of this comment memorandum in its entirety.

4.0 YVCC submits its current petition and the associated comments found on its website [www.yosemitevalleycampers.org](http://www.yosemitevalleycampers.org) , which was submitted with lesser signers via certified mail and by hand delivery to the Superintendent (Tollefson) at past opportunities with planning teams. Also as part of this submittal are approximately 500 hand written petitions that have been scanned into a DropBox as well as previous comments and previous information supplied to the Yosemite National Park Service planning teams:

<https://www.dropbox.com/sh/vepo8fd550pev2v/NhiqyG0s2l>

5.0 After receiving large scale maps provided by the MRP planners, YVCC submitted a red marked up copy, dated December 13, 2011, shortly after the MRP Alternatives Workshop, making specific recommendations and commenting on the previous Scoping Plan. We request it be re-entered into this comment session. The planning staff has it on hand and we hold a duplicate.

6.0 YNPS, in their planning efforts, localized their outreach and provided minimal efforts aside from local regional communities and is a failure in public outreach. In counting the participants at each venue and in total, this process has not reached the public scrutiny commensurate of the weight this study carries and the national precedent it sets. It is estimated that maybe there were

250 attendees, all within a short radius of the Park, save San Francisco and Los Angeles. We requested a venue in Orange County so that respondents in San Diego would have an opportunity but it was denied and held in Los Angeles, 3 hours from San Diego plus traffic delays during a weekday rush hour. U.S. Representative Tom McClintok requested a 90 day extension and 12 days were granted. How absurd!

7.0 The Plan is so voluminous it intimidates and deters the reader from being informed, as though it is a tactic of deterrence. Even the most knowledgeable public reader cannot make sense of it. The summary is too brief and misleading and has conflicting statements or leading statements with no backup, especially the statements of “adding more camping,” which is an outright lie.

8.0 The open house presentations spent too much time “selling the accomplishments of the YNPS” versus the opinions and accomplishments that the plan was mandated to do and it failed miserably in listening to those who took the time and trouble, often from far away, to come to the various events. This has been consistent behavior dating back to the 2000 MRP whereby the public was only given 3 minutes to speak with green/yellow/red light devices to limit their time as well as a court reporter taking testimonies. This method intimidated the respondents enough to mitigate their testimonies. It repeated this error at public meetings over many years.

9.0 There were no surveys of Park visitors to support public demand and preferences. Every opportunity was afforded them to walk and talk to visitors yet they chose not to do so. The public has to rely upon the Park’s charts and figures of their best guesses as described by Kathleen Morse in her presentation. This omission is quite to the contrary of representations made by planners; a double cross, if you will, plus it is not sound practice nor should it be tolerated for this level of planning.

10.0 After submitting nearly 2400 petitions to the planning staff and the Superintendent on numerous occasions, planning staff omitted their cry for at least one alternative in the Alternative MRP Study in spring 2012, which was to repair the flood damaged campgrounds and campsites.

**11.0 THIS IS WHAT WE CAMPERS WANT: AFFORDABLE FAMILY FRIENDLY AUTO BASED DRIVE-IN CAMPING IN YOSEMITE VALLEY. FIRST, RESTORE THE FLOOD DAMAGED CAMPGROUNDS TO INCLUDE LOWER PINES, UPPER RIVER, LOWER RIVER, AND GROUP CAMPGROUND, NORTH OF TENAYA CREEK. ALL THIS LAND IS CLASSIFIED AS DAMAGED CAMPGROUNDS IN NEED OF REPAIR (from the flood). POST FLOOD, CONGRESS GAVE THE YNPS FUNDS TO REPAIR THE DAMAGED CAMPGROUNDS (\$17 MILLION) AND IT WAS SPENT ON OTHER THINGS AND NOW THERE IS NO MONEY LEFT. ADDITIONALLY, WE WANT THE PARK TO PROVIDE THE SAME TYPE OF CAMPGROUNDS TO MEET THE PRE-1980 GMP LEVELS:**

**872 DRIVE-IN SITES  
58 WALK-IN SITES  
14 GROUP SITES**

12.0 The campgrounds, pre-1980 GMP, are historical landmarks just as the bridges and certainly predate Camp 4, known previously as the “dog camp” as it was the only campground that allowed dogs. It was awarded historical status after the climbers filed a lawsuit, via a settlement with the DOJ, as a place on the Register of Historical Places after a court battle. Does the public have to

sue our government to get the other campgrounds on the Historical Registry? All the campgrounds are historical back to the early 1900's when they had numbers (i.e.: North Pines was Camp 12).

13.0 Leave all the landmark and historic bridges alone and use engineering methods to mitigate hydrological problems that exist. Regarding Sugar Pine and Stoneman Bridges, what construction / engineering methods have been considered to salvage these historic bridges, which predate WSRA and provide Valley circulation, access, and emergency egress?

14.0 Do not remove any campsites from North Pines Campgrounds, especially along river's edge. Rather, add riverside campsites. Camping along the Merced River is a very specific ORV, unlike the other sites inland, and are the most sought after sites in the Park. River sites as they were in pre-flood conditions need to be repaired and more installed since there is no definitive damage caused by them. (Ref: ORV Baseline Condition Assessment Report) and for its significance in visitor experience and resource appreciation. Riverside camping has always been a recreational ORV.

15.0 Remove the split-rail fencing along the Merced River at North Pines Campground and all other campground locations to allow free flowing public access. This is what the land was granted for. Their installation cuts and destroys the natural tree root system and concentrates or compresses visitor access to river banks at the fence ends creating an unnatural experience.

16.0 Camping in the Valley is more than a recreational ORV; it is a traditional, social, and cultural ORV, in line with the Native Americans who first camped in the Valley. "Dwellers in a Deep Grassy Valley" equals "Ahwahneeche." We believe that affordable family friendly auto based drive-in camping is an endangered activity in Yosemite Valley. If this terrible plan is implemented, it will set the same precedent for planners of every study undertaken in our country for the WSRA compliance with a false basis of measurement.

17.0 It is apparent to the public that the YNPS believes that campers adversely impact the river as well as degrade it, even though they cannot prove it; is this via science or management discretion? Yet, in fact, the ORV Baseline Condition Report states to the contrary and that it is the river flooding that adversely impacts the river. Why does the YNPS plan use untruths? Repair the flood damaged campgrounds back to pre-flood conditions.

18.0 Campers enjoy the challenge of rustic living as it provides a calm and challenging method of fending for ourselves and a challenge of creativity, which lends itself for more appreciation of the Park's surroundings, other ORVs, and its resources. Visitation via camping is the opposite of fixed roof accommodation visitation and natural to the precious resources Yosemite has to offer.

19.0 Encourage and allow personal watercraft to the maximum extent possible **WITHOUT PERMITS!** Rafting in itself is an ORV. It will self-regulate and it does not create concentrated degradation as does concessions rafting. Plus, there will not be the need for diesel buses to circulate the Valley to pick rafters. There will not be the need for two rafting diesel bus depots to ferry the rafters from down-river to up-river locations. Can't the CNG shuttle buses provide this service for private rafters who carry small rafts? (Note: we cannot have campfires longer due to airborne particulate pollution but we can have circulating diesel buses for rafters?) Infrastructure support to maintain this activity would be eliminated such as raft repair, bus repair, personnel support, etc. The pool type ropes can be removed from the banks of the river too. This would maintain a safer and more pleasurable river environment, lessening the crowds in the river and less haul-out damage to riverbanks. By scooting a few fallen trees aside parallel to the flow of the river,

this can and will facilitate safer rafting as well as enhance the resources of the park and the ORV's, which we have requested for decades.

20.0 Campers bring their own bikes, fend for their own repairs and have done this for decades. Campers do their grocery shopping on their own bikes as well as travel throughout the Valley without the need for their cars. Campers basically park, camp, and ride. Campers use the Valley Shuttle Buses and buses to out of the Valley locations. We do not need bike rentals. But, improve the bicycle circulation paths throughout the valley, reaching to the west Valley end as well to such destinations as Bridalveil Falls. This will encourage even more private bicycle use. A bicycle circulation plan is recommended.

21.0 Install ice and wood vending stations at each campground whereby reducing auto trips to the market and mitigating firewood salvage from the Valley floor. The dry wood for sale is much better for air pollution management so those scalping wet or green wood would be less inclined to do so.

22.0 The demand for campsites is so high that it only takes one minute from the start of the reservation opening for all the sites for the month to be swallowed up. This has crept into the shoulder months of the summer and is creeping to the spring and fall months as well. US residents and taxpayers have to compete with the world, via the web, for sites they paid for. It is a technical race unequalled to anything imaginable. Reservation day is the worst day of the year because just the thought of failure to get a reservation is very discouraging. You have to face your family and say "not this time!" Tears flow.

23.0 The Comprehensive River Value Analysis openly states that with Alternative 5 (page 8-445) there is a "reduction in available day-use parking, and implementation of an East Yosemite Valley Day-use Parking Permit system." Don't even think about having campers pay for a parking permit also while camping!

24.0 The lack of group camping has caused campsite density to swell beyond the maximum of six (6) per site creating a diminished visitor experience. Campgrounds are bulging at this abuse of the rules and the staff and volunteers are not enforcing the rule.

25.0 Nowhere in the YNPS documents is the former Group Campground mentioned. Why not?

26.0 Do NOT install more walk-in sites. They create blight via the parking lots that must be created for the cars associated with them (as does Camp 4's lot). They discriminate against the young, elderly and the disabled. They do not support affordable family friendly auto based drive-in camping. Few, if any, want to go camping by way of a tour bus. See the YVCC study on Auto Based Camping visitation versus Tour Bus Visit, dated 05-06-2008 (2008-05-06) in the Drop Box link above.

27.0 Auto based camping is wise and supported due to the regulation emissions on autos versus the unregulated massive polluting diesel buses that now transport visitors to the Park. Auto based visitation is more eco-friendly. Besides, the roads in the Park are NOT engineered/designed for buses but rather autos and light trucks. Using CNG buses is precluded by the Park not being able to establish CNG filling stations for the busses. Moreover, the weight balance is upset as luggage needs to be loaded beneath the passengers but CNG busses have their tanks and mechanics below the passengers leaving luggage loading and storage to the top of the vehicle that won't facilitate safe travel through the roads as they would be top-heavy.

28.0 Lower Pines Campground, what is left of it after the 1997 Flood, is mostly being used or reserved for volunteers. Stop this use and open it up to the public. This is where OPRAH stayed, remember? Didn't the YNPS select this sight for her due to the good view along the river?

29.0 Realize that of the 81 miles of Merced River, we campers want our ORV to be only along a couple of miles. Can't there be a reasonable balance?

30.0 Every time there is a change in the park, campers bear the burden of the change. Campfires have all but been eliminated. No burning between the hours of 10PM and 5PM, every day. Ranger cops roam the campgrounds 24/7 writing citations and imposing worry on campers. We want to awake and warm ourselves by a campfire. We have not been able to do this for decades.

31.0 At the urging of U.S. Senator Dianne Feinstein, she being a camper, we started a petition to gather support for repairing the flood damaged campgrounds as funded by Congress. First we had 500 hand-gathered petitions then we started an electronic petition with places for signers to speak to their opinions. It can be viewed at our website: [www.yosemitevalleycampers.org](http://www.yosemitevalleycampers.org). The opinions expressed exemplified a message that is not of science or management practices or flippant chats but of a love affair and legacy for the Park beyond what one person can say. There are about 2000 signers and maybe 1400 testimonies. This has been submitted to the YNPS on more than one occasion for their review and consideration, but especially in the comment period for the Scoping Session of this plan. Unfortunately, no alternative was studied or made the cut for the scoping plan, which was the basis for this new MRP and the alternatives. What must we campers do to be taken seriously! Almost all planning meetings were attended and the information reiterated multiple times in each session. Comments were mailed in and hand delivered. By this memo, again we submit it to YNPS for the same. During scoping, we submitted a published book on the value of camping in Yosemite Valley titled "Yosemite" written by Vilija and Robert Deutschman and it went into the record. Unfortunately, the Plan does not exemplify nor take to heart these testimonies, which is most discouraging. In fact, it breaks the love affair and legacy that has been passed on by generations of Valley Campers.

32.0 Camping does not have adverse effects on the Merced River. Point of fact, the YNPS Baseline Assessment Report states that it is non-conclusive that visitors impact the river; however, flooding does impact the riverbanks, scouring its banks and plains. Campgrounds are easily repaired after each spring flood. BBQ's tucked back in, picnic benches rearranged because they are chained in place. All is recoverable. But not so with fixed roof lodging where huge costs are run up from water damages. So why is there not more camping and less fixed roof lodging?

33.0 The YNPS behavior is deceptive, divisive, and disingenuous. They encourage comments and pledge attention to them when all the while pacifies the public with little evidence of action. This was supposed to be a new plan with a different team, one that would partner with us campers to work out a solution. Passionate pleas were made at the open houses from Kathleen Morse that "We want your input so we can work out the bugs and tweak the plan." This could not be further from the truth. All she has done is waste the public's time and appease the participants to look good to the court. The YNPS only gave an impression of partnering and cooperation. They have no shame.

34.0 What has been observed over the years is a systematic elimination of affordable family friendly auto based drive-in campsites since the planning of the 1980 GMP. All six alternatives in this MRP DEIS are unacceptable and contribute to this plan of elimination. Affordable family friendly auto based drive-in camping in Yosemite Valley is an endangered activity. Stating just lip

service, Kathleen Morse stated “Camping is an ORV.” However, it is becoming quite obvious that visitors will have to “pay-to-play” in the Park. We have become aware that this plan is a profit and revenue motivated plan, funded by various groups as the Yosemite Conservatory and the Yosemite Fund, which is run by Superintendent Mike Tollefson and a large commitment of funds has been committed. We see a large conflict of interest in this association. It is also quite clear that a plan to maximize profits means to maximize demand, which in turn is to minimize vacancies in fixed roof lodging. If the concession lodging was at 100% capacity 365 days a year that would be a mission accomplished by the concessionaire and the YNPS who gets 15 % of the concessionaire’s revenue, funneled by private so called “charities.” It is much more profitable for the visitors to ride the buses to and from the park, and use all the concessions rather than wait for campers to buy provisions when in fact they bring most of theirs into the Park. The pair want to maximize the use of fixed roof lodging and the concessions in order to visit and enjoy our beloved. This would break up our love affair with the Park because our Yosemite is one that we enjoy by sleeping outdoors, hearing the Merced River flow by in the morning and at night, smelling the bacon cooking and hear the birds chirping, seeing the deer stopping curiously by, seeing the stars at night, hearing the wolves howling, telling our grandkids stories by the campfire while we roast marshmallows, peacefully floating down the river as we gaze up at our creator’s creation....awestruck.

35.0 Affordable family friendly auto based drive-in camping in Yosemite Valley is nature-focused that is regarded by millions of visitors as the ultimate family camping experience that imbeds a life-long ethic of resource preservation for all ages. Springing from this experience in the Valley is born the future climbers, backpackers, hikers, and conservationists, regardless of ethnicity or income level; an indiscriminate ORV. Where fixed roof facilities need multiple auto or truck trips for daily support year round, camping skills are developed for self-containment and comfort that needs minimal infrastructure support and can be enjoyed at entry level costs. Where fixed roof facilities are permanent year-round land impositions, campgrounds are only seasonal allowing regeneration of the land and many months of open space. *“Camping brings the visitor into a direct relationship with park resources and distances the visitor from the commercial values of comfort and convenience and the expression of social status. Thus, camping brings the visitor closer to the very natural attributes for which national park were set aside and protected.” (NPS 2006m)*

36.0 The 1980 GMP recognized the value of camping as a resource-focused activity. It proposed reducing the number of campsites in the Valley from 872 to 756 of which there would be 684 “family friendly” auto campsites, 58 walk-in sites, and 14 group campsites. In 1992, the Concession services Plan documented the existence of 7 campgrounds in Yosemite Valley for a total of 817 campsites- it would seem that this number would be the baseline for the number of campsites that existed at the time the Merced River was designated Wild and Scenic in 1987; however, it appears the Revised ORV Baseline Conditions Report is using 872 from 1980 as the baseline number. The flood of 1997 severely affected the Upper and Lower River Campgrounds as well as the lower portion of Lower Pines Campground (as well as the Group Campground north of Tenaya Creek) reducing the number of available campsites to 466 in the DEIS: however, the Park’s Report appears to be using 436 (The documents’ numbers don’t match and such discrepancies raise doubts as to the accuracy of any numbers used in the DEIS.) Doing the math, there appears to have been a 43-50% decrease in camping opportunities since the 1987 designation; and using the Report’s numbers, there has been nearly a 54% decrease in the number of “family friendly” auto based drive-in campsites since the 1987 designation.

Within one of the webinars (possibly Feb.14<sup>th</sup>), it was stated that camping was an ORV by Kathleen Morse. Regarding ORVs, the 1982 Guidelines state that “each component will be managed to protect and enhance the values for which the river was designated, while providing for public recreation and resource uses which do not adversely impact or degrade those values” (aka



the Nondegradation standard). WSRA then provides examples of possible River values such as scenery, recreation, fish and wildlife, geology, history, culture, and other similar values- though the primary emphasis still rests with the esthetic, scenic historic, archaeological, and scientific features. That being the case, there would seem to be no doubt that available camping opportunities in Yosemite Valley are in desperate need of protection and enhancement, especially considering the 54% loss of “family friendly” auto based drive-in campsites.

Though the preferred alternative proposes to increase Valley campsites from the No-Action Alternative number of 466 to 640, the mix of sites is suspect. Of that increase, 175 would be walk-in sites with presumably large parking lots, 36 are RV sites (more like the old “drive-in movie” experience), and only 19 would be auto based drive-in tent sites; the latter does very little to remedy the 54% loss of the “family friendly” auto based campsites from the baseline number at the time of the River’s designation. It also flies in the face of the more than 17 million dollars awarded by Congress to repair and put back the campsites that were lost in the 1997 flood.

The following chart attempts to track the erosion and reconfiguration of camping in Yosemite Valley:

	Pre-GMP	GMP	CSP	ORV BCR*	DEISexisting	2013MRP(Alt.5)
Total	<b>872</b> (859*)	<b>756</b> (743*)	<b>817</b>	<b>436</b>	<b>466</b>	<b>640</b> (642*)

[\*denotes Revised ORV Baseline Conditions Assessment Report. The Report’s 2012 number groups campgrounds together rather than delineating individually. The final number is less than what is documented in the MRP DEIS. The bolded totals are the official count per the Plan(s); the numbers in parens are the trackable ones. The concession Services Plan (CSP) only lists total sites in Yosemite Valley rather than delineating individually. The 1980 GMP authorizes 684 auto sites, 14 group sites, and 58 walk-in sites; there is no mention of Backpackers campground taking over Group Campground; it just seems to have suddenly app eared.]

37.0 What financial commitments or pledges or kickbacks have been made from the non-profits below and shouldn’t they be exposed to the public?

NATURE BRIDGE (formerly Yosemite Institute)

YOSEMITE CONSERVANCY (formerly Yosemite Fund, Yosemite Association)

UNIVERSITY OF CALIFORNIA, MERCED

DELEWARE NORTH COMPANIES (the current concessionaire)

38.0 The primary goal of the ones who pull the strings in the big picture with Yosemite (those above possibly), the money takers, is to maximize profits by having 100% occupancy in all the concession accommodations, 24 hours a day, 365 days a year, and by visitors bussed in, housed, and fed. There is no real regard for the environmental tenants or socioeconomic values of the plan. This is quite clear.

39.0 Harold Ickes (Secretary of the Interior, 1933-1945) was prophetic in stating: *"I think the parks ought to be for people who love to camp and hike ... and have renewed communion with nature. I am afraid we are getting gradually alienated from that ideal. We lie awake at nights wondering whether we are giving the customers all of the entertainment and all of the modern improvements that they think they ought to have. But let's keep away from that, because once we get started, there will be no end."*

40.0 This plan is NOT APPROVED in any way or alternative. If the YNPS really wants to correct the plan, repair the flood damaged campgrounds and sites to pre-flood (872 campsite) conditions and then add more affordable family friendly (regulated) auto based drive-in campsites.