**MARIPOSA COUNTY**  
**BOARD OF SUPERVISORS**  
**AGENDA**  
**ACTION FORM**  
**DATE: 11-23-93**  
**AGENDA ITEM NO.: 7-8**

**DEPARTMENT:** Planning and Building  
**BY:** Tony Lashbrook  
**PHONE:** 966-5151

**RECOMMENDED ACTION AND JUSTIFICATION:**  
(Policy Item: **Yes** _ _ **No_ X_ _)

Direct the Chairman to sign the attached response to the Scoping request from the National Park Service on the revised Yosemite Valley Housing Plan and EIS. The revised housing plan may impact Mariposa County and it is important for the County to provide input at the Scoping phase of the project. The Park Service is required to consider the County’s comments in the preparation of the revised plan and EIS.

**BACKGROUND AND HISTORY OF BOARD ACTIONS:**

County commented on original scoping and draft housing plan. Board directed Planning Department to coordinate comments on this new scoping request.

**LIST ALTERNATIVES AND CONSEQUENCES OF NEGATIVE ACTION:**

1. Approve comments and forward to National Park Service.
2. Modify comments and forward to National Park Service.
3. Do not submit comments.

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<td>C. Required additional funding</td>
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**SPECIAL INSTRUCTIONS:**

List the attachments and number the pages consecutively:

1. Draft Comment Letter
2. Review Comments

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**CLERK’S USE ONLY:**

Res. No.: 58-593  
Ord. No.:   
Vote - Ayes:  
Noenes:  
Absent:  
Approved ( ) Denied ( ) Minute Order Attached ( ) No Action Necessary

The foregoing instrument is a correct copy of the original on file in this office.

Date:  
**ATTEST:**  
MARGIE WILLIAMS, Clerk of the Board  
County of Mariposa, State of California  
By: Deputy

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**ADMINISTRATIVE OFFICER’S RECOMMENDATION:**

This item on agenda as:

- Recommended  
- Not Recommended  
- For Policy Determination  
- Submitted with Comment  
- Returned for Further Action

Comment:  

A.O. Initials:  

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Action Form Revised 5/92
November 23, 1993

Mike Finley, Superintendent
Yosemite National Park
P. O. Box 577
Yosemite, CA 95389

Re: SCOPING, REVISED YOSEMITE VALLEY HOUSING PLAN

Dear Mr. Finley:

Please consider this letter as Mariposa County’s formal comments regarding the Scoping of the revised Yosemite Valley Housing Plan.

Mariposa County is vitally interested in the proposed Yosemite Valley Housing Plan Revision. Mariposa County’s interests are directed at three levels:

1. Long term interest in the preservation and enhancement of Yosemite National Park as a natural wonder of unparalleled international importance.

2. General Impacts on County government and County residents associated with the proposed relocation of housing.

3. Specific comments related to the various identified alternatives.

The County’s comments are as follows:

1. Long term preservation and enhancement of Yosemite.

The County recognizes that preserving and enhancing the natural grandeur of the Park is of paramount importance to the long term economic and psychological well being of the citizens of the County. Deteriorating air quality and traffic congestion are the two most significant threats to the preservation of the Park and attainment of the Management Plan’s goals and objectives. However, the County does not believe that pursuit of the alternatives in the
housing plan is a cost effective means of addressing these most critical problems. According to the 1992 Housing Plan, the various alternatives range in cost from $103 million to $192 million in addition to additional on-going costs associated with transit and other new infrastructure. The source of this money is not identified in the Plan although it would be assumed to come from a combination of concessionaire contributions and Federal allocations. The County strongly believes that this level of investment could be used to more directly address the problems of air pollution and congestion. The development of a transit system serving staging areas outside the Park, carrying both employees and visitors, is one such alternative. The County recognizes that road improvements would be necessary in support of transit. This type of investment would appear to address a broader range of the problems identified within the Management Plan than does the proposed Housing Plan and would also be supportive of more recent planning efforts, such as the transportation study recently completed by the Wilderness Society.

The General Management Plan was developed based upon dated planning concepts and 15 year old public opinion. More current planning theory and public opinion would suggest that housing should be provided (or maintained) within walking distance of the work place (or if not possible, the appropriate transit station) to avoid the necessity of using the private automobile.

Mariposa County has embraced these current theories as evidenced by the County’s commitment to transit and to provisions of employee housing within remote resort development projects.

2. General Impacts on County Government and Residents.

The County’s concerns regarding the general impacts of the proposed housing plan relate primarily to the need for new and expanded governmental services to new concentrations of County residents and the relationship of the housing plan with Mariposa County’s General Plan. These concerns were expressed in the County’s response to the original scoping of the housing plan and the County’s comments on the initial housing plan (attached).

Although the County has some specific concerns regarding the on-going development of El Portal as a housing, maintenance and administrative site, it is surprising that the Park Service is seriously considering other alternatives. Millions of dollars have been spent by the Park Service
planning for relocation of facilities to El Portal and installing infrastructure to serve it. This initial investment has been followed by the construction of housing and the relocation of warehouse and maintenance facilities to El Portal. The relocation of these facilities and the associated large vehicle traffic already mandate widening of the Arch Rock Entrance. In addition, the County understands that the Department of Education and the School District are in the process of adding two classrooms to El Portal Elementary and relocating the alternative High School in Yosemite Valley to El Portal. Initiating a new effort in a previously unconsidered location such as Foresta or Wawona does not appear justified or appropriate at this time.

The housing plan identifies the cost of housing outside the Park (and El Portal) as a significant problem. Without question, housing costs on private land are substantially lower and opportunities greater on private land in the Midpines/Mariposa area than the Wawona/Fish Camp/Bass Lake/Oakhurst region. In addition, commute times from Midpines/Mariposa are much closer to the identified targets than would be possible along the Highway 41 corridor. An employee serving transit system is presently operating on a regular basis along the Highway 140 corridor. No such system is currently available along Highway 41.

Finally, all of the alternatives propose the elimination of the mobile home park in El Portal. The County recognizes the safety concerns associated with housing within an identified flood plain. However, the mobile home park does provide a significant number of scarce owner-occupied housing units in close proximity to Yosemite Valley. Elimination of this housing, without first providing replacement units, will seriously impact the availability of affordable housing in the area. Prohibiting future sale of the units will have a serious negative effect on their value, in all likelihood resulting in a rapid decline in the park and the units. The County requests that other alternatives be pursued, such as flood proofing the units and/or prohibiting the installation of new units after a certain date. This would result in preserving vital housing units and avoid the destruction of this neighborhood.

3. Specific Comments Related to the Various Alternatives.

Original Proposed Alternative and Alternative A.

The County's concerns regarding these alternatives are contained in our comments on the original housing plan and in preceding sections of this letter. This alternative
would likely have the effect of increasing traffic congestion and air pollution and should not be pursued.

**Alternatives B, C and E -**

These alternatives all propose locating some or all of the administrative facilities to El Portal along with various amounts of housing. The County's general comments about the cost and effectiveness of these alternatives are provided in the preceding sections of this letter. If a major relocation of facilities is proposed, the County is most supportive of these alternatives. The cost and visual impact of the bridge proposed in Alternative B and E must be carefully considered.

**Alternative D**

The no-project alternative. The County's general comments contained in the first section of this letter apply directly to the consideration of this alternative. It may be appropriate to look further at plans that would improve housing and reduce the physical area committed to development in the Valley.

**Alternative F**

This alternative would involve relocating administrative facilities and 200 housing units to Wawona. There is insufficient detail in this alternative to allow for constructive comments. For instance, the alternative does not discuss what other facilities and housing would be removed from the Valley or where the additional required housing would be provided.

This alternative is not at all considered in the Wawona Specific Plan that was developed and adopted concurrently between the Park Service and the County. The Wawona Plan would have to undergo a major modification to support this alternative.

The concerns about housing affordability would be exacerbated by this alternative. The private land in the Wawona, Yosemite West, Fish Camp area is the most expensive in the County. Unimproved lots can sell for well in excess of $100,000.00 in these locations.

The safety of employees regularly traveling over Chinquapin Pass in the winter time is of concern. This road travels to nearly 7000 feet and snowline conditions lead to many serious accidents each winter.
The Wawona/Fish Camp area is the most difficult and expensive for the County to provide services to. A substantial increase in population in this area could have serious fiscal impacts on government service providers, including the County and the affected school districts. Due to the lack of detail available for Alternative F, the County is unable to provide more specific comments at this time.

The County is appreciative of the invitation to be involved in this critical planning effort. We are committed to working with the Park Service towards the long term preservation and enhancement of Yosemite. Questions or requests for additional information should be directed to Tony Lashbrook, County Planning Director, (209) 966-5151.

Sincerely,

ERIC J. ERICKSON, Chairman
Mariposa County Board of Supervisors

attachment

tl/bc
cc: Senator Dianne Feinstein
Senator Barbara Boxer
Congressman Rick Lehman
Senator Dan McCorquodale
Assemblywoman Margaret Snyder
September 29, 1992

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

RE: COMMENTS ON DRAFT SUPPLEMENT TO THE FINAL EIS FOR THE GENERAL MANAGEMENT PLAN: Yosemite Valley Housing Plan

Dear Mr. Finley:

Thank you for affording Mariposa County the opportunity to comment on the "draft Housing Plan". As the document notes (page 162), the 1980 GMP contains two objectives related to coordinating NPS actions with local governments and private entities. Activities in Yosemite National Park have a direct impact on Mariposa County's economy and public services. Conversely, Mariposa County activities can have a direct impact on YNP. These functional interrelationships have resulted in practical cooperation such as mutual participation in the Yosemite Area Regional Transit program. It is with this cooperative background that Mariposa County offers its comments on the "draft Housing Plan".

Mariposa County was an active participant in the planning process that resulted in the 1980 GMP. After years of input and revision, the GMP has been utilized as the YNP "plan". However, the Concession Services Plan and "draft Housing Plan" contain "recommended alternatives" and/or "proposed actions" that appear to differ with the GMP. If Mariposa County desires to take action that conflicts with the General Plan, a formal amendment process must be conducted with public input, required findings, and similar documentation. Perhaps NPS should consider reopening the GMP public process if implementation activities that conflict with the GMP are under formal consideration.

After reviewing the "draft Housing Plan", the County is not certain that it contains sufficient information to determine
all possible impacts. In our view, movement of the proposed number of housing constitutes a formal "project".

57% of all direct employment in Mariposa County is related to tourism. Tourism, particularly visitation to YNP, dominates our local economy. Therefore, implementation of the Concession Services Plan and "Housing Plan" are very important to Mariposa County public and private sectors. I request that a more thorough analysis of "impacts on local economies" be conducted whenever any GMP implementation measure is considered.

The document (page 165) states that "Mariposa County and the State...would also be expected to incur some expenses". As you are aware, California and its Counties are in an extremely severe financial crisis. At this time it is unclear whether the County or State "can be expected to incur" any expenses. However, we do understand that should the "proposed action" be implemented there will be some County involvement in traditional public services. It is more than appropriate to request enhanced NPS cooperation and analysis if Mariposa County is expected to financially and otherwise cooperate in these matters.

The County is particularly concerned about the impact on emergency services, particularly medical response and search and rescue functions. The impact on search and rescue and emergency medical response may be significant. Note that the US Forest Service has little law enforcement and medical response capability and that the County will be expected to provide these services in the Foresta and El Portal areas.

Movement of employees further away from worksites directly and indirectly impacts housing outside YNP and local transportation. Reducing concessionaire and NPS housing increases demand on Mariposa County's already limited housing stock. In addition, uncertainty or transition in housing generally causes some affected employees to seek more stable housing in the private market. Additional employee as well as visitor reliance on automobile transportation can negatively impact Mariposa County's air quality and result in severe mitigation measures required by the Clean Air Act.

The County believes it generally inappropriate to make detailed comments on the specific Housing alternatives. However, if the proposed action is implemented several issues regarding Foresta should be considered. There is
only one "all-weather" road (Big Meadow) into Foresta. The County recommends that NPS improve the Foresta Road (from El Portal) for safety and commuting considerations. No data is available but the County believes that many "administration" employees have private housing in Mariposa County.

Improvement to the Foresta Road from El Portal will significantly reduce commute time from Midpines and other areas of the County. In addition, "carpool" and transit alternatives should be actively implemented. Safety considerations meriting improvements to Forest Road include emergency services and evacuation contingency planning as well as reduced travel on the confined portion of Highway 140 through "Arch Rock".

Again, thank you for the opportunity to comment on the "draft Housing Plan". Please feel free to contact us regarding this or any other matter.

Sincerely,

JAMES F. EVANS
Director
June 4, 1990

Mike Finley,
Superintendent
Yosemite National Park, CA 95389

Re: Scoping of Yosemite Valley Housing Plan EIS

Dear Mr. Finley:

Thank you for the opportunity to comment relative to the scoping of the E.I.S. for the Yosemite Housing Plan. At this point, the concerns of the Department are general and relate to two issues.

1. The potential costs to the County of providing services to new centers of concentrated populations.

2. The consistency of any housing proposal (particularly on private land) with the County's adopted land use plans and policies.

As more specific alternatives are developed, I would be interested in discussing potential County concerns in more detail.

I hope these comments are helpful in your scoping process. Should you or your staff have any questions, please give me a call.

Sincerely,

TONY LASHBROOK
Planning Director

TL:bc
cc: Art Baggett