



COUNTY of MARIPOSA

P.O. Box 784, Mariposa, CA 95338 (209) 966-3222

GARRY R. PARKER, CHAIRMAN
DOUG BALMAIN, VICE-CHAIRMAN
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ROBERT C. STEWART
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DISTRICT IV
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MARIPOSA COUNTY BOARD OF SUPERVISORS

MINUTE ORDER

TO: JEFF GREEN, County Counsel
FROM: MARGIE WILLIAMS, Clerk of the Board *MW*
SUBJECT: Board's Comments on the "Draft Yosemite Valley Plan"; Res. 00-245

THE BOARD OF SUPERVISORS OF MARIPOSA COUNTY, CALIFORNIA,

ADOPTED THIS Order on June 27, 2000

ACTION AND VOTE:

Approve Letter of Response to the Yosemite Valley Plan (County Counsel)

BOARD ACTION: Discussion was held and Jeff Green, County Counsel, advised of typographical corrections. Board members provided input on concerns and changes they would like to see to the draft letter of response, and reviewed input that was received from others. Board concurred with County Counsel working with the Board committee to make changes to the response. (M)Pickard, (S)Balmain, Res. 00-245 adopted approving the letter of response with changes as discussed and authorizing Chairman to sign the letter. Pierce Loberg commented on the letter from the attorney on behalf of the Wawona Area Property Owners Association, and he emphasized the public process; and he suggested that the Board request an extension of time to respond. Motion was amended, agreeable with maker and second, to include a request for extension in the letter/Ayes: Unanimous.

cc: Supervisor Reilly
Supervisor Pickard
File

Mariposa County Board of Supervisors

District 1.....PATTI A. REILLY
District 2.....DOUG BALMAIN
District 3.....ROBERT C. STEWART
District 4.....GARRY R. PARKER
District 5.....BOB PICKARD



JANET HOGAN
County Administrative Officer

MARGIE WILLIAMS
Clerk of the Board

P.O. Box 784
MARIPOSA, CALIFORNIA 95338
(209) 966-3222
1-800-736-1252

FAX (209) 966-5147

July 6, 2000

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

Re: Mariposa County Board of Supervisors Comments on the "Draft Yosemite Valley Plan"

Dear Superintendent Mihalic:

Thank you for providing the County of Mariposa with the "Draft Yosemite Valley Plan," hereinafter referred to as "Valley Plan," and the opportunity to comment on the contents. The Valley Plan consists of four voluminous documents together with one document consisting of maps, which relates to the various alternatives in the Valley Plan. As we stated in our letter dated March 23, 2000 to your office relative to the "Merced Wild and Scenic River Plan," we believe that the fast tracking of the Valley Plan that the Federal Government has established for public review and adoption is far too compressed to allow either the Board of Supervisors or the general public sufficient time to review the documentation and make meaningful comments. We therefore request that the Park Service extend the deadline for public comments to be received by a minimum of 90 days.

The Mariposa County Board of Supervisors shares the Park Service's desire that visitors to Yosemite National Park have the best experience possible while still maintaining the integrity of the Park. The County has always been committed, and the Board hereby reaffirms its commitment to cooperate with the Park to ensure that visitors to Yosemite do in fact have the best possible experience while still maintaining the integrity of the Park. As part of that commitment the County will continue to do what is economically feasible to help provide public transportation to and from the Valley.

We strongly believe that the Park Service cannot fulfill its mission without consideration of, and cooperation with, the gateway communities that provide all of the amenities that the Park is unable to provide to its visitors. We make these comments in the spirit of that cooperation between the County of Mariposa and the National Park Service and urge the National Park Service to give serious consideration to our comments.

1. RIVER PLAN

We believe that the preparation of the Valley Plan should have awaited a final review and adoption of the "Merced Wild and Scenic River Plan." We believe that a plan which shapes the future of Yosemite Valley by necessity must be in accord with the adopted plan for the Merced River. To embark upon an in-depth planning process for Yosemite Valley without the benefit of an adopted Merced River Plan seems ill advised.

2. ALTERNATIVES CONTAIN TOO MUCH DISCRETION FOR FUTURE ACTIONS

It is our opinion that all of the alternatives, including the preferred alternative, as was the case with the "Merced Wild and Scenic River Plan," contain too many unknown discretionary actions which

may be taken by the Park Service. Because of the numerous discretionary actions contained within each alternative, it is very difficult for the public to comment meaningfully on the alternatives. As an example, it is unclear when and under what circumstances historic structures may or may not be removed. We respectfully request that the alternatives be tightened up in terms of discretionary activities which may occur in the future but which are not sufficiently delineated at the present time for the public to adequately comment on.

3. PARKING AND OVERNIGHT ACCOMMODATIONS

We believe it is in the public interest to have as much visitor parking and overnight accommodations in the Valley as possible within environmental constraints. It enhances the visitor experience for visitors to be as close as possible to the visitation areas and services. We note in the "Preferred Alternative" of a one-time expenditure of \$343 million in capital and planning efforts, roughly \$5.45 million in annual operating cost increases, and \$11 million annually for operation of an internal transit system. This level of funding assumes 550 parking spaces in the Valley to accommodate all required day use parking during low visitation days from approximately November through February. It has been our experience that there is a problem with traffic congestion in the Valley on several days each year during the peak season. We believe that by increasing the level of parking in the Valley that traffic congestion would be reduced. Further, increasing the level of parking in the Valley should serve in reducing the cost of the expanded transit system.

Additionally, we note in the "Preferred Alternative" that the new baseline for camping facilities is the postflood number of campsites available and not the preflood number of campsites available. It is our opinion that the figures that should be used in the Valley Plan are preflood numbers of campgrounds and campsites. Generally speaking, campers are individuals who prefer to experience nature up close and personal, particularly in a location as beautiful as Yosemite Valley. Additionally, a larger number of campsites assure that individuals with lower median incomes can appreciate the Park on other than a day use basis. We therefore respectfully submit that the Valley Plan should provide for as much visitor parking and overnight accommodations as is possible within the environmental constraints of the Valley. Specifically, we request that the baseline figures for camping be considered preflood rather than postflood.

4. SOCIO-ECONOMIC IMPACTS OF EMPLOYEE RELOCATION

The Valley Plan lacks a complete analysis of the socioeconomic impacts of relocation of personnel to Foresta, El Portal, Wawona and surrounding communities. Additionally, there is a lack of analysis and a failure to recognize that some of those relocated employees will impact other communities. It is not enough to say for example, that law enforcement needs will increase, the Valley Plan should also analyze the way in which the Park Service and the affected local entity acting together can provide the funding needed for additional services. The failure to properly analyze the effects of relocation on surrounding communities indicates a lack of understanding of the services provided to County residents. We believe that, while some of the impacts are addressed, the conclusions contained in the Valley Plan relative to the socioeconomic impacts of relocation are minimized due to the inadequate understanding of the nature of the communities and how services are delivered. By way of example, relocating a significant number of individuals to the El Portal community will significantly impact library services provided by the School District and the County of Mariposa. The library is currently located in school facilities, and any significant increase in use will create conflicts between library users and school

operations. We also believe that by relocating essential services outside of the Valley it exacerbates the very problem that the Park Service is attempting to solve. For example, not having fuel in the Valley requires more, not less, vehicle travel through the Valley. Additionally, failure by the Park Service to provide medical facilities in the Valley will tend to increase traffic flow into and out of the Valley, not decrease traffic flow.

5. WORKSITE RELOCATION

We believe that relocation of employees should coincide with relocation of the worksite itself. There should be an analysis of this type of relocation. Prudent planning directs that employees live close to worksites. Because of the Park Service's desire to relocate a significant number of employees from the Valley, there exists an opportunity to relocate worksites, particularly National Park Service and Concession administrative worksites outside of Yosemite Valley. Such a relocation of worksites and employees would reduce commute time and provide private housing and economic opportunities for surrounding communities. We further believe that with few exceptions, there are no worksite opportunities in Foresta, El Portal and/or Wawona. Relocating employees to these areas will create more circulation problems than currently exists, particularly in inclement weather. We believe that the Valley Plan should identify those jobs and worksites that need to specifically remain in the Valley as well as those jobs and worksites that can accommodate a move outside of the Valley. Additionally, the Valley Plan fails to adequately analyze whether there is sufficient space and infrastructure in Foresta, El Portal or Wawona for appropriate relocation of either employees and/or worksites. In March of 1997 the Mariposa County Board of Supervisors commented on the 1996 "Yosemite Valley Housing Plan." Relative to relocation issues raised in the Housing Plan the County in its comments stated as follows:

"We are also concerned that additional intensity in El Portal will result in unreimbursed, ongoing expenses to the County, including road maintenance, fire protection services, law enforcement, animal control, parks and recreation, and library services."

We believe that the concerns raised in 1997 relative to the Housing Plan are as valid today as they were in 1997. The proposed Valley Plan raises many of the same issues as was raised in the Housing Plan. The County provides, and is required to provide, public services in Foresta, El Portal and Wawona. Additionally, the County provides public services to private properties located in Yosemite West and the Midpines area which lie outside of Yosemite National Park but are nevertheless affected by activities in the Park and will be affected by relocation proposals in the Valley Plan. We believe that the Valley Plan fails to appropriately analyze the processes which county government must follow when Park Service decisions result in actions by county government which are caused by National Park decisions. We submit that the relocation proposals contained in the Valley Plan do not adequately take into consideration the effects such relocation will have in the local communities of Foresta, El Portal and Wawona. Additionally, the Plan does not analyze the effects that will be felt in surrounding communities such as Fish Camp, Midpines and Yosemite West.

6. HOUSING

The Valley Plan proposes relocation of employees to communities surrounding and within the Park boundaries but fails to appropriately analyze the type of housing needed, the cost of the housing, and the effects the additional housing will have on the affected communities. The relocations as proposed appear to place the burden on the National Park Service and the federal

government for establishment of additional housing outside the Valley. We believe that every opportunity should be taken to provide employees with an opportunity to choose private housing outside the Valley and outside the communities of Foresta, El Portal and Wawona and to allow the private sector to respond to the demand, as is conventional in local economies. Private housing would remove the burden of providing costly housing by the Park Service and would additionally help mediate impacts on the Park communities. By way of example, the Park Service proposal contained in the Valley Plan for multiple family housing to be relocated to Wawona is inconsistent with the goals and objectives of the Wawona Specific Plan that the Park Service participated in preparing and approving. Specifically, the adopted goals include: "to provide for a limited and controlled...expansion of the community of Wawona; to provide for limited...residential development...; to ...protect the residential environment of the community; and to maintain the mountain, small community atmosphere of Wawona..." In January of 1990 the Mariposa County Board of Supervisors commented on the "Yosemite General Management Plan Update" relative to the Wawona area. The following comments regarding Wawona were contained in the letter of January 1990.

"The Wawona area has a Plan for the private property within Section 35. The Park Service should consider a similar Plan for its Wawona property within Section 35 for consistency of land use, setbacks, parking and other planning and development requirements. These areas are communities as well as places for 'relocation' of structures. The Park Service should encourage and permit the diversity of ages and interest that are necessary to be healthy viable places to live."

We believe that the Valley Plan does not contain an adequate analysis of the effects upon either the Park communities or communities lying outside of the Park relative to housing for relocated employees. By way of example, increased congestion in El Portal or Wawona would compromise important natural and cultural resources and result in a significant change in the community's character. We suggest that the same degree of effort that was used in assessing impacts in the Valley be used to assess the impacts of decisions that affect the Park communities.

7. PHASING OF PROPOSED PROJECTS

We believe that projects, which will be undertaken if the Valley Plan is approved, should be accomplished in a phased manner in such a fashion that the projects do not disrupt the visitor experience. This would include but not be limited to the Park Service completing a phase prior to the commencement of an additional phase.

8. HISTORIC STRUCTURES

We do not believe that any of the alternatives contained in the Valley Plan establish a compelling reason to remove any historic structures from the Valley. The stone bridges, the superintendent's house, and the apple orchard are examples of structures with a long important cultural history in the Valley. We believe that maintaining these structures will enhance the visitor experience and the cultural historic values of the Park and strongly oppose removal of any of the historic structures in the Valley.

9. FUNDING FOR IMPLEMENTATION OF PLAN

We are concerned about the funding necessary for implementation of the Valley Plan. Needless to say, if only partial funding is available, the effectiveness of the Valley Plan could be

David Mihalic, Superintendent
Yosemite National Park
July 6, 2000

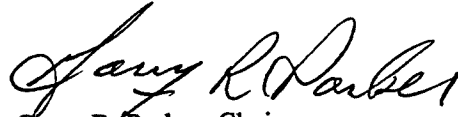
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severely compromised. With this in mind, our previous suggestions to look to the private sector to provide housing (and worksite locations) merit consideration. For example, the Park Service should concentrate on working with local communities for relocation purposes where infrastructure currently exists which would accommodate the required relocation. Additionally, it would be prudent to develop a phased implementation where each phase "stand on its own," to achieve portions of the Valley Plan's goals.

CONCLUSION

The Board of Supervisors appreciates the opportunity to comment on the Valley Plan and respectfully requests that the Park Service give serious consideration to our comments. Mariposa County stands ready, willing and able and invites the Park Service to partner with Mariposa County to help address the socioeconomic impacts of the Valley Plan as stated in this letter.

Very truly yours,



Garry R. Parker, Chairman
Mariposa County Board of Supervisors

rs

cc: Congressman George Radanovich
Board of Supervisors
County Administration
Planning Commission
El Portal Town Planning Advisory Committee
Wawona Town Planning Advisory Committee
Fish Camp Planning and Advisory Council
Lisa Edelheit, SEIU