MARIPOSA COUNTY BOARD OF SUPERVISORS

MINUTE ORDER

TO: ED JOHNSON, Planning & Building Director
FROM: MARGIE WILLIAMS, Clerk of the Board
SUBJECT: YOSEMITE HOUSING PLAN RESPONSE

THE BOARD OF SUPERVISORS OF MARIPOSA COUNTY, CALIFORNIA,

ADOPTED THIS Order on March 18, 1997

ACTION AND VOTE:

10:09 a.m. Ed Johnson, Planning & Building Director;
   A) Yosemite Housing Plan Response (No Folder) (Supervisors Reilly and Parker)
(Continued from 3/4/97)

BOARD ACTION: Discussion was held and the comments from the Midpines
Community Advisory Committee and from citizens of El Portal were considered -- Board
concurred that the communities could forward their comments directly to the Park
Service. Ed Johnson advised that he also has changes to incorporate in the response from
Bruce Daniels, consultant. Discussion was held relative to consideration of impacts from
the recent flood disaster with regards to the proposed housing plans. Carol Davis,
Midpines Community Advisory Committee, expressed concern with isolation of the El
Portal area for additional housing, and thanked the Board for being able to forward the
Advisory Committee's comments directly to the Park Service. Charles Lammers,
Midpines Community Advisory Committee, expressed concern with changes that occurred
in the last 25 years since the original planning that has led to the proposed Plan, and with
the changes as a result of the flood disaster, especially with the south side of the River,
and stated he felt these changes should be considered in the proposed Plan; he does not
want to see the Park Service in the housing construction business as he feels the Park asks
how much is wanted versus how much is needed; and he stressed the isolation of El
Portal. Discussion was held relative to the rough estimates for cost impacts on County
services. Further consideration of the response was continued to March 25, 1997.

cc: Supervisor Reilly
    Supervisor Parker
    File
March 25, 1997

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

Dear Superintendent Griffin:

Thank you for the opportunity to comment on the Park’s 1996 “Yosemite Valley Housing Plan.” We appreciate your willingness to extend the original comment period so that we and our constituents could have additional time for review and comment.

The comments previously submitted by the County from 1990-1993 remain applicable to this most recent 1996 Housing Addendum and we are re-submitting those comments for the record, attached.

The basis of our concerns still remain the same. They are as follows:

Process

The 1996 Housing Plan is an addendum to the Final Environmental Impact Statement for the General Management Plan. This FEIS was proposed in the late 1970’s. Somewhere prominent in the documentation, there should be a discussion or analysis of whether the goals and data from the late 70’s are still valid today, 20 years later. At some point, the 1980 FEIS may no longer be adequate as an environmental determination for actions taken today or in the future. The President’s Council on Environmental Quality advises agencies to carefully evaluate any EIS over five years old, and this one is now 17 years old.

We appreciate your efforts to seek comments on the Housing Plan, and urge you to continue to include the gateway communities and the County in every step of this and other General Management Plan Implementation actions.
Data

It continues to be difficult for us to understand the numbers in the Housing Addendum. A clear, concise explanation of who needs housing where would be welcome. This would also help in determining possible housing locations.

It is also not clear to us whether the “Additional Housing Needs” numbers in Table 3 are still valid. They were based on the perceived need for existing employees and a rather ambitious expansion. However, the recent flood has changed this equation, possibly reducing the number of employees rather than expanding the number. The housing needs should be re-examined in light of these significant new factors.

Assumptions

The Housing Addendum assumes that a commute time exceeding 30 minutes is unacceptable. However, expanding this commute time to 45 minutes would increase housing location opportunities. Also, since some people will be working in El Portal, a commute time of 45 minutes to El Portal also seems viable. These changes in assumptions open new alternatives for housing in Midpines and Mariposa.

Private-Public Partnership

The Housing Addendum welcomes private sector participation, but stops there. A new, fully developed section should be added to the addendum exploring private-public partnerships in providing housing. Additional private-public partners could provide assistance in both funding and site selection. This would significantly reduce the cost of housing.

Funding

Private sector partners could coordinate public and private resources to reduce the overall costs of providing housing. For example, the Draft Addendum on page 118 lists Federal agencies consulted. Neither the U.S. Department of Housing and Urban Development nor the U.S. Department of Agriculture Rural Housing Assistance offices were given an opportunity to review. These sister agencies have considerable financial and technical assistance resources which should be aggressively pursued to reduce housing costs and provide greater economic opportunity. In addition, of the State of California agencies consulted, the California Housing Finance Agency, another important source of funding, was omitted.

Local housing authorities provide another mechanism for financing, developing and managing low and moderate income housing. Created by State law as a quasi-governmental corporation, local housing authorities administer funding from the U.S. Department of Housing and Urban Development (HUD). Most recently, these funds are channeled through the HOME and HOPE programs although Section 8 housing was its
predecessor. Housing authorities also have bonding authority for housing development that exempts the unit of general local government (e.g. Mariposa County) from incurring any liability.

Other sources of private/public funding could include Community Development Block Grant Programs, tax credit investor financing, and Community Reinvestment Act financing through local lenders.

Site Section

The Draft Addendum does not include Mariposa, Midpines or other sites within a one-hour commuting time either in Mariposa County or elsewhere as viable alternatives. The Yosemite Valley Housing Study, in comparing Yosemite Park with major resort areas, states that,

"Commutes of up to 30 minutes were not thought to be a problem for the employee or the company, and commutes of about 60 minutes were tolerable."

Why shouldn’t these commute times apply to Yosemite also?

Mariposa County could undertake an inventory of available, developable sites in conjunction with property owners and facilitate a proposal to the National Park Service. This proposal should be included in a revised National Park Service document.

The 1996 Draft Addendum reconsiders Wawona as a potential housing site even though it is “further than a 40-minute commute from the Yosemite Valley” because the administrative headquarters of the Park Service and the primary concession could be relocated there along with housing for employees working in those offices. If this is the case, then the same analysis should be provided for relocating the administrative headquarters and primary concession to Mariposa.

The feasibility of housing employees in nearby communities has not been determined. If a cooperative NPS/County initiative were undertaken with potential funding sources identified, the private market would most probably respond to this unprecedented economic opportunity. Site and neighborhood standards adopted by the U.S. Department of Housing and Urban Development (HUD), a sister agency to the National Park Service, or the Farmers Home Administration (Department of Agriculture) should be employed in the housing study.

The Park Service should not approve the Addendum until a comprehensive private-public partnership is fully developed.
Regional Coordination

Several other components of the General Management Plan have been discussed recently and will be decided upon soon. This includes the Alternative Transportation Modes Feasibility Study and the Valley Implementation Plan. It is difficult to view housing absent these other two key areas. All of these areas should be studied together as they all interrelate. Better coordination of these efforts needs to be incorporated into the housing planning process.

Transit

The location of employee housing and transportation for the employees are two issues that go hand-in-hand. The Housing Plan should include a component that addresses transit. The County has been working diligently for several years in this area including subsidizing bus operations into Yosemite Valley and participating in the YARTS regional planning efforts.

Also, recent events have seen the County become even more involved with transit into the Park. This would include transporting not only employees, but also overnight visitors staying outside the Park and day users.

Because Mariposa, MIdpines and other locations outside of the park were not considered as housing alternatives, no comprehensive, systematic transportation analysis is provided. Before any portion of the housing plan is adopted, a comprehensive, integrated analysis of transportation and its physical, economic and management impacts on housing, commercial and administrative facilities should be first undertaken. The transportation analysis should consider alternatives for reducing capital and operation costs as well as enhancing revenues. Other factors to be included in the analysis should be reduction in emissions, odors, noise, energy consumption and traffic congestion.

Management solutions are preferable to capital solutions if they are cost effective. For example, the organization and coordination of existing transportation resources utilizing the NPS, YCS, County, other local governments, school district, lodging and private providers is more desirable than investing in major public improvements.

Better coordination of these efforts needs to be incorporated into the housing planning process. The County invites the NPS to join with us in this transportation planning effort.

Specific Locations

With regard to specific recommendations in the Housing Addendum, the County is pleased to see that Foresta and Wawona are not being recommended for development. This is consistent with our previous comments.
However, we do have very serious concerns about the intensity of development proposed for El Portal. In particular, the Riverside housing area seems ill advised given that it is in the floodplain and sustained damage in the recent Merced River flood. There is also testimony in the record that this area has important archeological sites, including burial sites.

Other environmental concerns include the possibility that a bridge across the river as proposed could affect deer winter range habitat and migration routes and black bear habitat by providing a new access linking the north and south sides of the river. Nearby habitat areas that could be impacted have been identified as Areas of Special Biological Importance by the California Department of Fish and Game.

Also, El Portal does not have sufficient land to provide services for the proposed housing intensity. Existing public utilities and infrastructure are barely adequate to support the current population levels and would be significantly stressed by the housing proposal. There is also concern that new development could impact and threaten buildings of historical significance.

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

The County suggests that other alternative locations can be found to relieve this level of density by doing the following:

- increase the minimum acceptable commute time to at least 45 minutes.
- consider a commute time of 45 minutes to El Portal, not Yosemite Valley.
- initiate a private-public partnership to find acceptable sites and for joint venture construction.
- further decentralize administrative functions and relocate non-essential functions to Mariposa.
- consider the use of transit when analyzing location and commute time.
- join with the County in implementing a coordinated transit system.

Conclusion

The County is willing to provide assistance in initiating an historic, private-public partnership to achieve our mutual goals in housing and transportation. We should consider this to be an unprecedented opportunity to work together on innovative and cost efficient solutions. Yosemite deserves no less.

Thank you for considering our comments. Although time is of the essence in providing housing to Yosemite employees to facilitate re-establishing full operation in the Park, we believe these efforts should proceed in a well coordinated fashion so that all parties will benefit.
March 25, 1997

Superintendent, Yosemite National Park

We request a meeting with you and your staff at your earliest convenience to explore these most important issues further. We will call you to schedule the meeting.

Sincerely,

ROBERT C. STEWART
Chairman, Mariposa County Board of Supervisors

enclosures

cc w/o enc.
Representative George Radanovich
Senator Barbara Boxer
Senator Dianne Feinstein
Governor Pete Wilson
Senator Richard Monteith
Assemblyman George House
Bruce Babbit, Secretary of the Interior
John Garamendi, Deputy Secretary of the Interior
May 26, 1994

Jerry Belson, Acting Superintendent
National Park Service
P.O. Box 577
Yosemite National Park, CA 95387

RE: Environmental Assessment Employee Housing, Phase IV El Portal

Dear Mr. Belson,

Thank you for the opportunity to comment relative to the environmental assessment for the fourth phase of NPS employee housing in El Portal.

The purpose of this response is to re-affirm Mariposa County's general concerns regarding Yosemite National Park's employee housing plan, as incremental development has definite cumulative impacts. These concerns have been addressed in detail in past County correspondence to your organization. A summary is provided:

- The County is generally supportive of NPS plans to relocate park and housing facilities to El Portal, if a major relocation of facilities is proposed. This is based in part on current planning theory which suggests that housing should be provided within walking distance of the work place (or, if not possible, the appropriate transit station).

- The County remains committed to the VIA Highway 140 Express transit system, and has subsidized this program since its inception (currently averages $15,000/month). This program provides a direct service to many park service employees who live El Portal. Additional housing facilities in El Portal have the potential to impact these services.

- The County has some concerns regarding the impacts of new housing on other governmental services which are the responsibility of the county, in particular provision of emergency services.

Again, thank you for the opportunity to comment on this project.

Sincerely,

Edward J. Johnson
Planning Director
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
TESTIMONY OF ARTHUR G. BAGGETT, JR.
TO THE U. S. DEPARTMENT OF THE INTERIOR
MAY 30, 1991
YOSEMITE NATIONAL PARK
Mr. Chairman and Members of the Committee:

My name is Art Baggett. I am Chairman of the Mariposa County Local Transportation Commission. I also serve as the Supervisor of the 1st District of the County of Mariposa, representing the Eastern portion of Mariposa County, which includes Yosemite Valley, Yosemite West, Wawona, Fish Camp, El Portal and Midpines.

My family and I have lived in El Portal for fourteen years, where my wife teaches at El Portal School. Prior to that I lived in Foresta for three years and Yosemite Valley for approximately one year. I am a building designer and licensed contractor and also hold a graduate degree in Environmental Studies and Solar Design.

I would like to welcome you to Mariposa County on behalf of the Board of Supervisors and the people who live and work in the communities of the Yosemite area. We very much appreciate your taking time out of your Holiday weekend to come and hear concerns which are so critical to Yosemite National Park, to its visitors and to its workforce.

Housing

Quality housing and community life for employees is essential to the preservation of Yosemite, as it directly affects morale and attitudes both toward the public and toward the park resource. The issues of day care, schools, quality medical care, and recreational opportunities for employees and their families are just as
important here as in any other community in the United States. Yosemite is not exempt from the challenges of the aging workforce, single parent families, and homes with two working parents. I would like to comment on specific areas around and in Yosemite National Park.

1. Yosemite Valley: Housing in Yosemite Valley is essential for employees who have front line jobs in Yosemite Valley. The Park entrances to Yosemite Valley are frequently closed due to natural disasters or weather conditions. When this happens, the guests who remain in the Valley still need food, law enforcement and emergency services. The doctors and medical staff must remain close to the clinic as currently is the case. Front line law enforcement and rescue rangers, as well as concession employees, must also maintain residence in the Valley along with essential management personnel.

Something must also be done to upgrade the housing of the hundreds of front-line employees living in tent cabins. We concur with the comments offered by SCIU, the Yosemite Day Care, the Yosemite Medical Clinic, and the Tenants Association on the housing issue.

2. El Portal: Our Board has gone on record supporting the move of the warehouse facilities and non-essential offices to El Portal which would allow relocation of the corresponding housing (attachment 1). We welcome a joint planning effort with the Park Service in the Merced River
Canyon area. We have kept commercial development along the 140 corridor and away from the residential areas. This is something we believe the Park should consider. El Portal is a community and not just a place for "relocation" of structures. The Park should encourage and permit the diversity of ages and interests that will make this community a healthy, viable place to live.

In 1988, the Congress passed HR1390 which required the National Park Service to develop regulations for lease administration on the El Portal Administrative Site. The Park Service has had problems with some of the details of this legislation, and therefore has not implemented it. The Committee should consider amendments, if necessary, to allow the private/public partnership intended by this legislation, and thus allow housing to be built in a timely manner by the private sector. Private housing also offers the possibility of working with the State and Local Housing Authorities as well as access to FHA and HUD housing programs. A cooperative housing effort between the United States Forest Service and the National Park Service in both the Fish Camp and the El Portal areas should also be investigated.

3. Wawona: The commute time from Wawona/Fish Camp area to Yosemite Valley exceeds one hour and is commonly a high snow covered pass in the Winter. This route is the major road for visitors to come from Southern California into
Yosemite Valley. To congest it with commute traffic to the Valley seems unnecessary.

4. **Foresta:** The distance from Foresta to the Valley, lack of infrastructure, and the necessary buildings which the envisioned community of 1,000 people would require (schools, eating facilities, laundromats, stores, etc.), make the option of a Foresta relocation in our opinion the least attractive. The environmental considerations, e.g. water and sewage, endangered species (Great Grey Owl) and the aesthetics of the view from the Big Oak Flat Road, are major concerns. Foresta is also within the boundaries of Yosemite National Park. The cost of developing schools, pumping water up from El Portal, and transporting people to Yosemite Valley and El Portal would be great. As you are also aware, local governments cannot assess school or other development fees on federal projects. This presents a major funding issue for the county.

5. **Midpines, Mariposa:** These areas currently have over 250 permanent Park employees commuting to El Portal and Yosemite Valley. As the El Portal area is used more for administrative services, the Park Service should work in conjunction with the County to encourage and develop housing within the Midpines/Mariposa area. We would welcome any joint efforts in this area.

**TRANSPORTATION**
A need for a transportation study and action in the short-term is obvious. The air quality in this Class I area, as evidenced by the non-attainment area designation for PM 10 in Yosemite Valley, is getting poorer with the continuing reliance on single-family vehicles. On June 25, 1991, the Mariposa County Board of Supervisors passed Resolution No. 91-310 (attachment 2), which calls for improved transit in the Yosemite region and authorizes expenditures of funds to hire a consultant to perform the first task in regional transit study. Our primary objective is for Mariposa County (with cooperative planning and decision making by the neighboring counties of Merced, Madera, Tuolomne, Mono, and the National Park Service) to adopt a short-term action plan to increase the viability of public transit. We hope to accomplish two things with this Yosemite Regional Transit System Task Force: first, to examine the issue of day use and visitors from motels and campgrounds around the Yosemite and Wawona areas; secondly, to find ways to meet the need for employee transit from a) the Mariposa/Merced areas to El Portal and Yosemite Valley and b) from the Oakhurst area and Fish Camp, to the Wawona area of Yosemite National Park.

We would encourage the committee to consider working with the appropriations committees to appropriate funds for the National Park Service to become partners in this joint
planning effort with our Yosemite Area Regional Transit Task Force.

LONG-TERM TRANSIT ISSUES

Before discussing specific solutions to the long-term transit issues, one must first look at the true carrying capacity for day use of the Yosemite National Park and the various areas within in it, based on impact on the Park's resources. Once we know how many people to move, then technology can take over. Our Board strongly supports the option of a rail or other form of mass transit.

TRANSIT AND LAND USE PLANNING

There is a strong need for a cooperative regional planning effort and for consideration of transit in the town, county, and state planning process in conjunction with Yosemite National Park. Today, for example, the Wawona entrance station increase in visitation count is 10% over a year ago. CalTrans is currently in the process of planning a four-lane highway from Fresno which would terminate at Fish Camp. Local governments on a weekly basis are making decisions on subdivisions and commercial developments along Highway 41 in Fresno, Madera, and Mariposa County. The problem is obvious. It is imperative that a strong cooperative effort begin, for what one agency does clearly effects the other.

TRANSPORTATION AND AIR QUALITY ISSUES
As a local governmental body which also serves as the Board of the Mariposa Air Pollution Control District, (which includes Yosemite Valley and Wawona,) we recognize the need for management of commuter traffic, as well as visitor traffic, to mitigate ever worsening air quality. We have serious concerns regarding the relocation of housing for non-management employees outside the Valley. From an air quality standpoint, locating workers near their place of employment is clearly the trend in the environmental planning arena. This should be factored into policy considerations.

**HIGHWAY 140 - EL PORTAL TO YOSEMITE VALLEY**

As noted in attachment 3, our Board and Transportation Commission strongly supports and has supported in the statehighway planning process the priority of widening and realignment sections of Highway 140 between El Portal and Yosemite Valley. This portion of the highway needs to be improved because of the relocation of major warehouse and maintenance facilities to El Portal.

**REGIONAL PLANNING CENTER**

We believe that it would be in the Park's best interest to have a regional planning center in a nearby area such as Fresno, California. With regional planning, California's complex air and water quality regulations, state underground tank regulations, and California's overwhelming population growth, the need for local contacts and dialogue is evident.
The Regional Center could serve not only Yosemite, but also Sequoia and Kings Canyon National Parks. This could actually have the potential of saving the Park Service money, for they would not be flying planners, consultants, and designers from Denver to the Yosemite and the Sierra region. It would be even more beneficial if a regional planning effort could be expanded to an interagency concept much like the successful model for the Merced River Canyon with the National Park Service, the National Forest Service and the Bureau of Land Management.

Only with the cooperative effort between local, state and federal governments can the best land use decisions be made which protect the resources on the federal lands within the Yosemite Sierra Nevada which all of us so greatly value.
January 4, 1990

National Park Service
Attention WR-RP Yosemite
450 Golden Gate Avenue
Box 36063
San Francisco, CA 94102

Gentlemen:

Thank you for the opportunity to comment on the Yosemite GMP update. As the local governmental body which has the greatest influence over land use of the areas around the two major Park entrances, as well as serving as the Board of the Mariposa Air Pollution Control District (which includes Yosemite Valley and Wawona), we offer the following observations and comments.

We strongly believe that the essence of the 1980 GMP, to reduce the impact of the automobile on Yosemite Valley, is still a valid goal. While we agree that funding realities change, we also believe that change should act as a catalyst for more creative solutions; not as an excuse to abandon the goal.

Air Quality

The air quality issue is a major concern not only of our Air Pollution Control Officer, but of the State Board as well. This past June, after much effort, our Air Pollution Control Officer convinced the State Air Pollution Control Board to consider Yosemite Valley as a sub-district of the Mariposa Air Pollution Control Board in order to avoid potential sanctions being applied county-wide because of problems localized in Yosemite Valley.

1. We could not support changes that exacerbate the current air quality of Yosemite Valley, but would encourage implementation of portions of the GMP which help reduce this problem.
2. The transportation issue is most significant. The Mariposa Local Transportation Commission is performing a transit study for the county, including the potential for a Mariposa-Yosemite route. We are identifying potential users, funding, and cooperating agencies, including the County schools and the National Park Service. We will be looking at ways to manage commuter as well as visitor traffic.

3. Our Air Pollution Control Board has serious concerns regarding the relocation of housing for non-management employees outside the valley. The fact that these are low income jobs with varying shifts would make it very difficult to provide adequate mass transit to the Park. The current trend in environmental planning is to locate workers near their work place and to discourage long commutes. Since these service workers must work in the Park, they should live in the Park. This should be factored into policy considerations. Management positions, non-essential to the daily running of the Park, should be moved out of the Park if air quality is of real concern.

4. This brings up the question of relocation of office buildings. We support the move of warehouse facilities and non-essential offices to El Portal, which would allow relocation of corresponding housing. This would also encourage the relocation of all jobs and corresponding housing which, again, is non-essential to the daily Park operations.

The Park Service needs to more clearly resolve the apparent conflict between preserving historic structures within the valley versus restoration to natural eco-systems. This will greatly impact the need or lack of need to find new sites for offices.

5. The issue of a transit system for day use visitors is one that must be resolved. A staging area outside the valley still merits serious consideration. While money may not be available from the Park Service, we believe that a public/private, local/federal partnership could find a solution if Yosemite Valley is to be available to the millions that seek to visit this National Park.
National Park Service  
January 4, 1990  
Page 3

6. Upgrading Highway 140 is also imperative if day use traffic is to be reduced by a transit system. The Board of Supervisors serving as the Local Transportation Commission has consistently placed Highway 140 improvements as a priority over other State highways within the county. We have offered to assist the Park Service in acquiring funds to improve Highway 140 within the Park as well. (Letters attached).

7. While we agree that there should be no increase in camping or motel accommodations in the Park, reducing accommodations within Yosemite Valley is not the answer either. According to the 1980 plan, carrying capacity for overnight use has still not been reached. To arbitrarily reduce accommodations by 17% would not solve the problem of air quality, but would more likely increase it. Until a transit system is developed, more accommodations on the Park boundaries would mean more day use visitation and bring more automobiles into the Park.

Effect of Relocation on County Services

Our comments on the fiscal impact to the county resulting from relocation of services to El Portal are the same as in 1980. Increased population brings with it increased costs which are not offset by new tax revenue. The increase in cost to the School District for construction and to the County for law enforcement and court costs would be substantial, with the Park being exempt from development fees and taxes. (1980 comments attached).

The County has established Town Planning Areas in El Portal, Wawona and Fish Camp. While the Fish Camp and Wawona plans are in place, the El Portal Plan has not been written. We would welcome a joint planning effort with the Park Service in the Merced River Canyon area. We have kept commercial development along the 140 corridor and out of the residential areas. This is something we believe the Park should consider also. 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 set backs, parking and other planning and developmental requirements. These areas are communities, as well as places for "relocation" of structures. The Park should encourage and permit the diversity of ages and interests that are necessary to be healthy, viable places to live.
National Park Service
January 4, 1990
Page 4

Conclusion

As a policy making body that spends 50% of its time with planning issues and the public process, we believe that a GMP task force should be formed to evaluate and find solutions to the problem areas discussed in the GMP. This task force should be composed of representatives from the Park Service; Mariposa County; the offices of Congressman Condit and Senators Cranston and Wilson; the Yosemite Park and Curry Company; and the public. Our staff would be glad to meet with you to discuss the data presented and provide additional material.

Sincerely,

[Signature]

ARTHUR G. BAGGETT, JR., Chairman
Mariposa County Board of Supervisors

D33AGB/vf
attachments
January 3, 1990

National Park Service
Attention WR-RP Yosemite
450 Golden Gate Avenue
Box 36063
San Francisco, CA 94102

Gentlemen:

Please accept these comments regarding the Yosemite General Management Plan. My interest in the future of Yosemite National Park is twofold. First, I have a keen personal interest as a Mariposa County native having had a number of personal associations with the Park. My uncle was a Park Service employee operating the Alder Creek entrance station in the early 1930's on a daylight to dark basis, seven days per week. My cousin operated the White Wolf Stables for the concessionaire for several years in the 1950's. I feel extremely fortunate to have worked myself as a back country packer for the National Park Service in the late 1960's and early 1970's. Secondly, I have served as a Mariposa County Supervisor for the past 11 years, the last 10 of which have also been as Chairman of the Mariposa County Transportation Commission. I wish to offer my comments on two areas of the plan.

First, the Park Service proposes to relocate administrative and non-essential buildings and housing outside of the Park. It would appear to me that one of the most logical locations you would consider is El Portal. However, the weak link in the decision-making process would be the existing narrow roadway between El Portal and the Valley proper. Mariposa County, in its concern for the future of the Park and the safety of County residents and tourists, has adopted as its number one long-range transportation priority, the improvement of the continuation of Highway 140 from El Portal to the Valley floor. Although this lies outside of County and State jurisdiction, the public traveling over Highway 140 has no way of knowing when State jurisdiction ends and Federal jurisdiction begins, and their safety should not be compromised. Mariposa County has offered to assist the National Park Service in seeking funding solutions, including such options as the State Transportation Improvement Program (STIP) and utilization of State and County allocations of
Federal highway funds. This offer gives us a unique opportunity to participate in a cooperative effort which would enhance safety and circulation within the Park.

Also, I understand that Yosemite Park and Curry Company has already relocated some of its staff and service facilities as far away as Fresno and Southern California. I personally do not see how this could be of benefit to the operation of the Park, especially if suitable sites were developed nearby.

The second area of comment concerns the recommendation to reduce overnight accommodations. I firmly believe there is a need to update in the Valley the now antiquated overnight accommodations in the form of tent cabins. Tent cabins do not offer the security to the traveling public that the climate and social atmosphere of the Park dictate. While tent cabins used to be the preferred accommodation for many people, they are now a last resort largely for security reasons. Personal possessions cannot be secured, and personal safety cannot be assured. Replacing these units with a proper clustering of accommodations would reduce impacts and better accommodate the growing elderly and disabled travelers visiting the valley. Modernization does not have to impact the Valley. My daily contact with people who visit Yosemite indicates that it is the desire of the Yosemite visitor to actually stay in Yosemite, not stay outside and visit on a day basis. I believe their views need to be represented.

Thank you for your careful consideration of these recommendations. I would be happy to have further discussions regarding the merits of these viewpoints.

Sincerely,

ERIC J. ERICKSON
Supervisor, District 3
Mr. Robert O. Binnewies  
Superintendent  
Yosemite National Park  
P. O. Box 577-GMP  
Yosemite, CA  95389

RE: Mariposa County comments on Yosemite Management Plan EIS

Dear Mr. Binnewies:

Please accept these comments regarding the Revised Management Plan EIS from the County of Mariposa. The Board of Supervisors reviewed these comments in draft form and referred them to the Mariposa County Planning Commission. The Planning Commission has been designated by the Board of Supervisors to prepare the official County comments on the EIS.

In summary, it is the position of Mariposa County that the Management Plan EIS (as revised) fails to meet the standards of the National Environmental Policy Act (NEPA) and is therefore inadequate. The basis for this position is as follows:

1. South Fork Merced River

   A. Water Acquisition

   The Supplement states that up to 40% of the low water flow of the South Fork of the Merced River may be utilized by the community of Wawona at full development. The supplement does not, however, address the impact of this water acquisition upon the County of Mariposa, who has rights to 112,000 acre feet of South Fork water per year beginning in the year 2014, as per the agreement worked out by the Merced Irrigation District and the County of Mariposa in 1958.

   B. Water Quality

   The Supplement states that a new wastewater treatment plant will be constructed in Wawona, with treated effluent being sprayed upon the
Mr. Robert Binnewies  
March 31, 1980  
Page 2

golf course. The Supplement does not, however, address the impacts which this sewage treatment plant may have on the quality of the South Fork of the Merced River, particularly during the winter months when spraying would be unfeasible or during breakdowns of the treatment plant (which can occur at any time). This is particularly important to the County of Mariposa in light of plans to some day develop the South Fork for purposes of domestic supply to the populated portions of the County.

2. Energy

The Supplement states that although increased energy consumption may result from the longer commute distances employees of the Park will have to make as a result of the revised General Management Plan, the impact will be mitigated by the use of buses. The Supplement does not deal with the impacts upon energy or road conditions which these buses will have, however.

3. Schools and Other Public Services

The Supplement states that the use of Wawona as Park Headquarters may result in a problem to the Mariposa County School System because high school students will have long commute distance to Mariposa (the only high school in the County) and may have to go to school in another County (specifically, Madera County, where the high school is already overcrowded). The Supplement does not recommend any measures to mitigate this impact upon the County of Mariposa, who will have to pay Madera County to educate these students.

In addition to the impact on schools in Wawona, additional development, supporting the Wawona facility expansion, can be expected to take place in Fish Camp, Yosemite West, Ponderosa Basin, and their environs. School in addition to other public service demands, can be expected to be impacted by the development of Wawona. These impacts will not be recreation oriented, but rather full-time residents supporting the Park Service Administrative facilities and tourist services. Their service demands will be substantially different than the historic recreation oriented residents of these areas. These service demands will fall primarily on the County of Mariposa. The Plan and environmental statement does not address these impacts and no mitigating measures identified.

4. Construction and Development

The construction of new facilities at both Wawona and El Portal will require temporary support facilities, lodging, and public services for a multitude of construction workers. This impact has not been addressed
in the draft environmental statement nor the impacts on Mariposa County mitigated.

If you have any questions regarding these comments, please direct them to the Mariposa County Planning Commission. Thank you for your attention to this matter and I look forward to working through the problems the revised Plan creates in the future in hope of finding mutual resolutions for both the County and the Park Service.

Sincerely,

Barron Brouillette
Chairman, Mariposa County Planning Commission

BB/kw